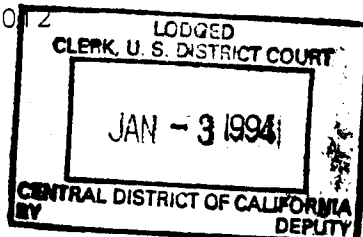


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6  
7 UNITED STATES DISTRICT COURT  
8 CENTRAL DISTRICT OF CALIFORNIA

9  
10 CHURCH OF SCIENTOLOGY ) Case No. CV 91 6426 HLH (Tx)  
INTERNATIONAL, a California )  
11 non-profit religious ) DECLARATION OF STACY YOUNG  
organization, ) DATED JANUARY 3, 1994, AND  
12 ) FILED IN OPPOSITION TO  
Plaintiff, ) PLAINTIFF'S VARIOUS MOTIONS  
13 ) FOR PROTECTIVE ORDERS AND IN  
vs. ) SUPPORT OF DEFENDANT GEERTZ'  
14 ) VARIOUS MOTIONS TO COMPEL  
STEVEN FISHMAN AND UWE GEERTZ, ) DEPOSITIONS  
15 )  
Defendants. ) Date: January 4, 1994  
16 ) Courtroom: J  
[Hon. Venetta S. Tassopoulos]

17 Trial Date: 2/8/94  
18 Pre-Trial Conf.: 1/31/94  
19 Motion Cut off: 1/24/94  
Discovery Cut off: 12/31/93

20 [Filed Concurrently with  
21 Declaration of Graham E.  
Berry dated January 3, 1994

22 **DECLARATION OF STACY YOUNG**

23 I, Stacy Young, declare as follows:

24 1. I have been retained by Dr. Geertz's counsel, Graham  
25 Berry, as an expert consultant in this litigation and have been  
26 designated as one of Dr. Geertz's experts to testify at trial  
27 herein. The statements herein are of my personal knowledge or  
28

1 reasonably based on information and belief, and if called upon as  
2 a witness, I can testify competently thereto.

3 2. This declaration is submitted in connection with  
4 defendant Dr. Uwe Geertz's opposition to plaintiffs' motions for  
5 protective order regarding the taking of certain depositions in  
6 this litigation.

7 3. I was a member of the Church of Scientology for more than  
8 14 years, from January 1975 until July 1989. From October 1975  
9 until I left, I was a member of the Sea Organization, the most  
10 dedicated group of Scientologists in the entire organization. I  
11 spent most of my time from 1978 until 1989 in a highly  
12 confidential section of Scientology management which was known as  
13 the Guardian Office until 1982 and is today called the Office of  
14 Special Affairs. This section of Scientology is responsible for  
15 dealing with all external public relations, all matters relating  
16 to civil litigation or criminal matters, all governmental  
17 relations such as the IRS, and all critics of Scientology.

18 4. During my tenure in Scientology I acquired extensive  
19 knowledge of the Scientology counseling methods known as auditing,  
20 the methods of training staff members and public Scientologists,  
21 the methods of dealing with non-Scientologists (known as "external  
22 publics") and former Scientologists and/or critics, known as  
23 enemies or suppressives, and the administrative and management  
24 procedures of the organization.

25 5. My first experience with Scientology was at the Mission  
26 of Atlanta, Georgia, where I attended a series of introductory  
27 lectures about the mind. I received some basic auditing and took  
28 several basic courses.

1           6. I joined the Sea Organization ("Sea Org," or "SO") at the  
2 Advanced Organization in Los Angeles ("AOLA") in October 1975. To  
3 become a Sea Org or SO member one must sign a billion-year  
4 contract to confirm one's dedication to Scientology and "clearing  
5 the planet" (see explanation below).

6           7. All staff members involved in delivering the confidential  
7 upper levels of Scientology auditing and all staff members involved  
8 in Scientology management must be members of the Sea Org. They  
9 live communally and are under the absolute authority of the Sea  
10 Org command lines 24 hours a day. I was paid \$24 per week - when I  
11 was paid.

12           8. The Sea Org has total authority over all Scientology and  
13 Scientology-related organizations, including all nonprofit and  
14 for-profit corporations. It cuts across all corporate boundaries  
15 and can take over any Scientology organization without notice. Any  
16 Scientologist who refuses to submit to Sea Org authority is  
17 declared a "suppressive person" and expelled from Scientology.

18           9. All Scientologists consider that Scientology is the only  
19 way for Mankind to go free. For a Scientologist this means getting  
20 "exterior" to the physical body ("exteriorization") and, indeed,  
21 to the entire physical universe, returning to Man's "native state"  
22 as a "static," which is "without mass, without wave-length,  
23 without time, and actually without position." In fact, L. Ron  
24 Hubbard created a new category of humanity for those who go  
25 through all the levels of Scientology processing; they transcend  
26 the state of Homo Sapiens and become what he called Homo Novis  
27 (similar to Nietzsche's Superman). Scientologists expect that once  
28 they have attained this state they will be free to travel

1 throughout the galaxies, freeing others who are in the trap of the  
2 physical universe. What will happen after that is somewhat vague,  
3 but no one has attained this state as yet anyway, so it doesn't  
4 really matter.

5 10. The route out of the physical universe trap is called  
6 "The Bridge to Total Freedom." Every Scientologist is at one stage  
7 or another on this Bridge, and they are expected to get everyone  
8 else on this Bridge as well. The idea is for everyone on Earth to  
9 get exterior to the physical universe. The only people who aren't  
10 included are "suppressives," meaning those who have been critical  
11 of Scientology. Suppressives don't deserve to go free. Hubbard did  
12 not consider that suppressives should be allowed to go free.

13 11. The Bridge is composed of a series of auditing processes,  
14 an auditing process being a set of specific questions and  
15 commands. The person who asks these questions and delivers these  
16 commands is called the "auditor." The person who answers the  
17 questions and carries out the commands is the "preclear," since  
18 the first major milestone on the Bridge is called "going Clear."  
19 After one attests to the state of Clear, one moves on to the  
20 confidential upper levels of auditing known as the "Operating  
21 Thetan" or "OT levels" ("thetan" being Hubbard's term for the  
22 person without his or her body).

23 12. At the level of OT 3, one is allowed access to  
24 handwritten notes by Hubbard which detail a terrible disaster that  
25 happened in this sector of the universe 75 million years ago. The  
26 head of the Galactic Federation, whose name was Xenu, solved a  
27 massive overpopulation problem by rounding up billions upon  
28 billions of people and transporting them in blocks of ice to

1 several volcanoes on Earth, which was known as Teegeeack at the  
2 time. They were dumped near the volcanoes and subjected to H-bomb  
3 explosions. At the same time, they were subjected to a series of  
4 images which were electronically driven, or "implanted," into their  
5 minds. After the "implant" was completed, these disembodied beings  
6 were transported to Hawaii and Las Palmas where they were packaged  
7 up into "clusters." Attached hereto as exhibit "1" is a copy of  
8 the OT 3 materials.

9 13. According to Hubbard, the OT3 implant is rigged to kill  
10 anyone who finds out about it before they have received the lower  
11 levels of Scientology processing. Needless to say, it is a major  
12 revelation to discover that one is covered from head to foot with  
13 these disembodied beings, called "body thetans" or "BTs" in  
14 Scientology. One has literally millions, or even billions of these  
15 BTs, and they have to be audited on very precise processes to get  
16 them to wake up and disengage themselves (or "blow") from the  
17 person's body. The idea is that once all of these BTs have been  
18 gotten rid of, one will be able to exteriorize from the body at  
19 will. These BTs can cause illness and even insanity if they become  
20 upset, so it is important to get rid of them as quickly as  
21 possible and to make sure one has done a very thorough job of it.

22 14. I was a staff member at the Advanced Organization of Los  
23 Angeles ("AOLA") from October 1975 through December 1978. AOLA is  
24 one of a handful of organizations around the world where people  
25 can go to receive the confidential upper levels of Scientology  
26 processing. I audited hundreds of hours on public preclears as  
27 well as staff members to prepare them for their upper levels, or  
28 OT levels. (When a person begins their OT levels they no longer

1 have an auditor. They graduate to what is called "solo auditing,"  
2 a process in which they audit their own disembodied beings, called  
3 body thetans or BTs.) I also did many security checks on staff  
4 members. A security check is a method of inducing a person to  
5 confess to his or her crimes, particularly crimes against  
6 Scientology.

7 15. In 1977 I was posted as Interne Supervisor at AOLA. In  
8 this capacity I supervised auditors-in-training, known as internes,  
9 to certify them as qualified professional auditors. To perform  
10 this function I had to understand auditing procedures precisely,  
11 from the most basic processes to the advanced processes and  
12 procedures of Class 6 and Class 8, which are advanced levels of  
13 expertise, so that I could recognize whether or not the internes  
14 were conducting themselves as proper auditors.

15 16. As a result of my experiences at AOLA I acquired a high  
16 level of expertise as a "tech terminal," meaning one who is  
17 knowledgeable about the technical application of Scientology  
18 auditing and training methods.

19 17. at the end of 1977 I transferred to the United States  
20 Guardian's Office ("USGO") in Los Angeles. I was a staff member in  
21 the USGO from January 1978 through January 1982. The Guardian's  
22 Office was the part of Scientology that handled Public Relations,  
23 Intelligence and Legal matters for Scientology. 18. Because of  
24 my technical background, I was posted as the Organizing Officer  
25 ("Org Officer") for the Public Relations Bureau and, later, as the  
26 Org Officer for the entire Guardian's Office. As the Org Officer my  
27 functions included the handling of all personnel and  
28 organizational matters, such as correcting a staff member who made

1 mistakes, taking care of staff members who were sick or upset or  
2 in trouble, recruiting new people for staff, and promoting or  
3 demoting staff members as needed. I was also responsible for the  
4 establishment and proper administration of all the Guardian's  
5 Office personnel throughout the United States. Because the  
6 Guardian's Office oversaw certain aspects of the administration of  
7 all other Scientology organizations, I became very familiar with  
8 the overall structure of Scientology and how the various  
9 organizations interact with each other and with the outside world.

10

11 19. In early 1982 I was assigned to a unit known as Special  
12 Project as a Public Relations Assistant under my husband, Robert  
13 Vaughn Young. In this position I became familiar with the L. Ron  
14 Hubbard archives material, which was the complete collection of  
15 all of Hubbard's personal papers, including diaries, letters, and  
16 notes that he had kept from a very early age.

17 20. Several months later Special Project became what is now  
18 Author Services, Inc, a for-profit company whose ostensible  
19 purpose was to be L. Ron Hubbard's literary agency. I was taken  
20 out of public relations and made the Organizing Officer for ASI in  
21 April 1982. In this position I worked directly for David  
22 Miscavige, who was Chairman of the Board of ASI ("COB ASI"), to  
23 carry out his orders concerning the staff of ASI.

24 21. David Miscavige, known as DM, has been the head of  
25 Scientology since 1981. His loyalty to L. Ron Hubbard and  
26 Scientology is absolute, and he is utterly ruthless about  
27 maintaining his power. He moved the seat of power from ASI to the  
28 Religious Technology Center (RTC) in 1987, during a period of time

1 when the IRS was investigating ASI's ties to the nonprofit  
2 corporations of Scientology. At that point he appointed himself  
3 Chairman of the Board of RTC, which is his current title.

4 22. Although ASI was established as a for-profit,  
5 non-religious corporation, in reality while DM was COB ASI the  
6 staff of ASI ran the entire Scientology network. ASI had complete  
7 control over the management of all Scientology orgs and missions,  
8 all Office of Special Affairs activities, all transfers of funds  
9 between church accounts and LRH accounts, every aspect of the life  
10 of anyone who was a Scientologist, whether staff or public. These  
11 powers were moved to RTC in 1987, as explained above.

12 23. Because of my experience in ASI I am familiar with the  
13 day-to-day activities and procedures of the highest levels of  
14 management of Scientology.

15 24. I have firsthand knowledge of the establishment of the  
16 corporate structure of Scientology as it now exists, having worked  
17 with the staff who were responsible for creating it. The purpose  
18 of this activity was to create an impenetrable, legally defensible  
19 network of corporations such that neither the IRS nor any other  
20 legitimate agency of government could "pierce the corporate veil"  
21 of Scientology organizations, thereby freeing Scientology  
22 management to transfer funds between organizations without concern  
23 for the law.

24 25. I am also familiar with the absolute authority which the  
25 highest levels of Scientology management exercise over every  
26 aspect of Scientology and Scientology-related organizations,  
27 whether "church" or "secular," and the ruthlessness with which any  
28 sign of disloyalty or disaffection is handled.



1           26. In September 1982 I was assigned to the Rehabilitation  
2 Project Force ("RPF"), the Scientology version of a prison camp. I  
3 was assigned to the RPF because I was openly critical of DM's  
4 coercive and degrading treatment of staff members. I was on the  
5 RPF in Los Angeles for eight months.

6           27. As a result of this experience I am familiar with the  
7 absolute control which the highest levels of Scientology management  
8 have over the behavior and thought processes of every Sea Org  
9 member. There is only one way for a good Sea Org member to behave  
10 and think, and any deviation from this is punished immediately and  
11 severely. In turn, it is the responsibility of all members of Sea  
12 Org management to bring about the same pattern of behavior and  
13 thought in all Scientologists under their authority, regardless of  
14 whether those under their authority are part of the "church" or  
15 the various "secular" arms of Scientology. This distinction means  
16 nothing within Scientology; it was created purely to facilitate  
17 dissemination of Scientology and to fend off Scientology's  
18 "enemies," such as the IRS.

19           28. From May 1983, when I was allowed off the RPF, until July  
20 1984 I was posted as Course Supervisor at the International  
21 Training Organization (ITO) in Los Angeles. From this position I  
22 trained hundreds of fledgling Scientology executives from all over  
23 the world on the administrative and management policies of L. Ron  
24 Hubbard known as the Organization Executive Course, or OEC. As a  
25 result of this experience I am very familiar with the  
26 administrative policy of Scientology and know that Hubbard  
27 formulated it to facilitate the establishing and organizing of his  
28 worldwide network of Scientology organizations.

1           29. In August 1984 I was transferred back to the PR Division  
2 of the Guardian's Office, which by that time had been renamed the  
3 Office of Special Affairs. My primary functions were as a writer  
4 and editor for FREEDOM Magazine, a Scientology publication created  
5 to serve as a vehicle for attacking individuals and groups who  
6 were perceived as threats to Scientology. I also wrote articles for  
7 other Scientology publications.

8           30. As a result of my experience as a writer for these  
9 different Scientology publications, I am familiar with  
10 Scientology's practice of changing its story for whatever public  
11 it is trying to manipulate. Often I rewrote the same basic story  
12 for each publication, completely changing the wording and overall  
13 thrust of the story to appeal to the different publics that were  
14 going to read it.

15           31. As a writer in OSA I was also responsible for writing  
16 rebuttals of negative stories about Scientology that were published  
17 in various newspapers across the country. I was also assigned to  
18 write rebuttals of books that were published that were negative  
19 about Hubbard and Scientology. As a result of this work I became  
20 very familiar with the policies and practices of Scientology with  
21 regard to individuals and groups that criticize the organization.  
22 I have personal knowledge that the practices which were formerly  
23 called "Fair Game" continue to be employed, although the term "Fair  
24 Game" is no longer used. These tactics are laid out in many of the  
25 key policies that are studied and applied by staff of OSA.

26           32. In July 1989 my husband and I left Scientology. We lived  
27 in San Diego from 1989 until August 1991, at which time we moved to  
28

1 Newport Beach. We are currently living in Corona del Mar,  
2 California.

3 33. As a result of my experiences in Scientology I am  
4 qualified to discuss the policies, procedures and practices of this  
5 organization, including the treatment Steven Fishman received at  
6 the hands of this organization.

7 34. I have read Steven Fishman's book, The Lonesome Squirrel,  
8 and I have reviewed his testimony up to his sentencing. I have  
9 viewed a 1981 videotape of Fishman under hypnosis by Dr. Uwe  
10 Geertz, and I have viewed a 1989 videotape of Fishman being  
11 interviewed by his attorney Mark Nurik and Dr. Richard Ofshe in  
12 Fishman's home in Florida. Based on the review of these materials  
13 and my knowledge and experience in Scientology, I do not believe  
14 there is any doubt that Steven Fishman was driven to a psychotic  
15 break (known in Scientology as "Type 3 PTS," a term which I will  
16 explain below) by Scientologists, either deliberately or through  
17 greed and gross negligence of his welfare.

18 35. It is utterly forbidden for anyone with a serious  
19 psychiatric background, including an extensive history of hypnosis  
20 such as Fishman had, to be allowed to have any Scientology  
21 processing at all. Attached herto as Exhibit "2" is a copy of  
22 Hubbard Commincation policy letter entitled "Illegal PCs,  
23 Acceptance of High Crime PL. I have been advised by Mr. Berry that  
24 it was well known by Scientology operatives that Fishman was not  
25 eligible for processing because of his history of therapy with Dr.  
26 Uwe Geertz; yet he was induced to buy more than \$100,000 worth of  
27 Scientology books, written materials and prints, clearly being led

28

1 to believe that he would be welcomed into the privileged circle of  
2 dedicated Scientologists.

3 36. Furthermore, he was also induced to purchase three  
4 E-meters (electro-psychometers), the device used in Scientology  
5 auditing. E-meters are not used for anything else but auditing,  
6 and they are not supposed to be sold to anyone without proof that  
7 they are in training as an auditor.

8 37. But in the Scientology world there is a thing called  
9 statistics, and Fishman was an unsuspecting victim of this system.  
10 Every single staff member in a Scientology organization has a  
11 statistic which measures his or her production. These statistics  
12 are reported every Thursday to International Management in CSI.  
13 For Scientology staff members, their lives virtually revolve around  
14 making sure their statistics are rising every week. Many things  
15 depend upon this. If their stats are down they may not be paid  
16 that week. They may not be allowed to spend any time with their  
17 spouse or children. They may not be allowed any time off at all,  
18 and since they already work as much as 14 to 18 hours a day, one  
19 day or even half a day off becomes very important, even if it is  
20 only enough time to do laundry. If their stats continue to go  
21 down over a period of time, they risk being assigned to the  
22 Rehabilitation Project Force or "RPF," which is a Scientology  
23 prison camp. Needless to say, people can become quite desperate  
24 under these circumstances, and they will do just about anything to  
25 get their statistics up.

26 38. Nowhere in Scientology is the push for statistics more  
27 frenzied than in the departments responsible for bringing money  
28 into the organization. Unfortunately Fishman appears to have been

1 the unwitting victim of a feeding frenzy which involved at least  
2 nine different Scientology corporations. These people discovered  
3 that Fishman had money and that he was willing to give it to  
4 Scientology. They took his money even though they knew he would  
5 never be able to receive any benefit from Scientology auditing,  
6 even though they knew he could harm himself with the materials  
7 they were selling him. Indeed, it is clear that Fishman was  
8 overwhelmed by the Scientology materials he was given, to the point  
9 of an actual psychotic break.

10 39. To understand how this could have occurred it is  
11 necessary to explain briefly how Scientology processing works. In  
12 essence, the theory behind auditing is that by confronting painful  
13 incidents in the past one can free up mental energy that has been  
14 locked up in these painful memories. L. Ron Hubbard created many  
15 auditing processes which are supposed to help an individual  
16 achieve greater sanity. But he made it clear that the processes  
17 must be done in a precise way with no deviation. There are severe  
18 penalties for anyone who deviates from the standard procedures.  
19 Hubbard made it clear that it can be very harmful psychologically  
20 and even physically to deviate from these procedures.

21 40. Certain situations can cause a person to have trouble in  
22 auditing. The most serious thing that can hinder a person's  
23 progress up the "Bridge to Total Freedom" (as the exact series of  
24 auditing processes is known) is becoming a Potential Trouble  
25 Source, or PTS. A PTS is someone who is being suppressed in some  
26 way by another person or entity.

27 41. There are different types of PTSness. Some of these are  
28 listed in an October 27, 1964, policy by Hubbard known as

1 "Policies on Physical Healing, Insanity and Troublesome Sources."  
2 Attached hereto as Exhibit "3" is a copy of Hubbard Communication  
3 Office Policy letter entitled "Policies on Physical Healing,  
4 Insanity and Troublesom Scources". Ten types of PTSness are listed  
5 in this policy letter, each one of which has to do with types of  
6 people who have caused Scientology "considerable trouble." They  
7 include people who have sued the church, newspaper reporters,  
8 family members who are hostile to Scientology, etc. They are listed  
9 as Type A through Type J, thus the policy has been nicknamed the "A  
10 to J policy." When someone is labelled as being any of these types  
11 of PTS, he or she is barred from getting any Scientology  
12 processing (auditing) or training, because people who fall into  
13 these categories have historically caused trouble for the  
14 organization, either by bringing legal action against it or by  
15 giving negative information to the press.

16 42. Steve Fishman was labelled Type A, which is "persons  
17 intimately connected with persons (such as marital or familial  
18 ties) of known antagonism to mental or spiritual treatment or  
19 Scientology." He was also labelled Type C, which is "persons who  
20 have ever threatened to sue or embarrass or attack or who have  
21 publicly attacked Scientology or been a party to an attack and all  
22 their immediate families should never be accepted for processing".  
23 Fishman was labelled Type C because he had paid a large amount of  
24 money for a set of Hubbard's taped lectures which he had never  
25 received, and he had threatened to sue CSI after trying for months  
26 to get his money back. (In Scientology one is never supposed to  
27 step outside of the Scientology "justice system"; anyone who does  
28

1 so, such as by filing a police complaint or a civil suit, is  
2 immediately disqualified for Scientology services.)

3 43. Furthermore, because of his background of hypnosis,  
4 Fishman could never be eligible for Scientology services.

5 44. Despite the fact that he was declared PTS A and C, and  
6 that it was known he had an extensive history of hypnosis by a  
7 psychologist, thereby barring him permanently from Scientology  
8 auditing and training, Fishman was sold over \$100,000 of  
9 Scientology materials, including a huge collection of tape recorded  
10 lectures by Hubbard (which are not supposed to be listened to until  
11 one reaches a certain level of Scientology training), packs of  
12 material that are only supposed to be seen by people in certain  
13 staff positions, and, what is most shocking, three E-meters, one  
14 of which was specifically designed for use by auditors on the  
15 confidential upper levels of auditing. It is specifically designed  
16 for use in solo auditing, which is auditing of oneself. It is  
17 clear from his videotaped interview that this is precisely what  
18 Fishman used it for.

19 45. This created an explosive situation, one which clearly  
20 could lead to a psychotic break in Fishman. Even as recently as  
21 September 1993, Ray Mithoff, Inspector General for Technology, the  
22 most senior Scientology technical expert in the world, supervised  
23 the auditing of a person in England who had had a psychotic break  
24 as a result of her experiences with Scientology. A copy of  
25 Scientology's report on this incident is attached hereto as exhibit  
26 "4". This person had a psychiatric history, and the mixing of  
27 psychiatric techniques with those of Scientology had caused the  
28 psychotic episode. So it was obviously known that Fishman risked a

1 Type 3 psychotic break if he were allowed training or auditing,  
2 could yet he was sold thousands of dollars worth of materials  
3 anyway, including an E-meter with a solo auditing capacity  
4 permitting him to self audit. Thus, either intentionally or simply  
5 out of greed and negligence, Scientology created a situation in  
6 which Fishman would almost certainly suffer a psychotic break and  
7 become a Type 3 PTS, as explained below.

8 46. The types of PTSness described earlier, Types A through  
9 J, relate to different types of threat a person can pose to  
10 Scientology. There are also three types of PTSness, known as Type  
11 1, Type 2 and Type 3, which relate to a person's own state of mind  
12 and physical health. A person will manifest PTSness through a  
13 range of conditions, all the way from a minor cold to a more  
14 serious illness (all illness is a sign of PTSness) to full-blown  
15 insanity. All PTSness is the result of being connected to one or  
16 more suppressive people, suppression being defined as "a harmful  
17 intention or action against which one cannot fight back." A copy  
18 of a Hubbard Communications office Bulletin entitled "Search and  
19 discovery" and describing these PTS types is attached hereto as  
20 Exhibit "5".

21 47. Type 1 PTS means that the suppressive person is actively  
22 suppressing the person in present time. To handle this a person is  
23 interviewed by someone who helps them spot who is suppressing  
24 them, whereupon the illness (a cold or whatever) is supposed to  
25 vanish.

26 48. Type 2 PTS means that the person was connected to the  
27 suppressive person earlier, either in this lifetime or an earlier  
28 lifetime (it might have been 150 years ago, or 76 trillion years



1 ago - whatever is real to the person). Someone in present time  
2 reminds the person of the actual suppressive person, and this is  
3 making the person sick. Curing Type 2 PTSness requires extensive  
4 auditing, usually on the PTS Rundown.

5 49. Type 3 PTS is the Scientology term for a fullblown  
6 psychotic episode. It was my experience in Scientology that when a  
7 person has a psychotic break they lose touch with the real world  
8 and begin to hallucinate or imagine conversations, events, people,  
9 and whole scenarios. Even after they recover they are never sure  
10 what part of the experience was real and what they imagined.

11 50. The subject of Type 3 PTS cases is one of the dark  
12 secrets of Scientology. No one is supposed to talk about it outside  
13 of Scientology, and it is treated with utmost security when someone  
14 becomes Type 3 PTS. The reason for this is obvious: people are not  
15 supposed to be driven insane by Scientology, so it would be a  
16 public relations nightmare to try to explain it. But more  
17 importantly, the treatment of people who have psychotic breaks in  
18 Scientology is a clear abuse of the mental health laws, and if such  
19 treatment were brought to the attention of mental health officials  
20 there is little doubt that Scientology would be subjected to public  
21 scrutiny for its practices in this area.

22 51. A number of things can trigger a psychotic break, or  
23 cause a person to "go Type 3," as they say in Scientology. In his  
24 first book, Dianetics: The Modern Science of Mental Health,  
25 Hubbard's term for "mental voices" was "demon circuits." Later he  
26 made it clear that what is actually occurring when someone has a  
27 psychotic break or "goes Type 3" is that all of his body thetans or  
28 BTs have become upset and are all talking to him at once.

1           52. In Fishman's case, it is unclear whether he was driven to  
2 this state of mind purely through fraudulent irresponsibility and  
3 negligence, or whether it was done more deliberately, as described  
4 in the following Hubbard lectures.

5           53. In a number of taped lectures Hubbard said that a person  
6 could be driven insane through the deliberate application of what  
7 he called Black Dianetics. This is his term for a method in which  
8 the normally therapeutic methods of Dianetics and Scientology are  
9 reversed and the person is deliberately driven mad.

10          54. In a September 17, 1951, tape called "Some Notes on Black  
11 Dianetics," Hubbard stated:

12                 "A person can drive himself quite mad with  
13 Dianetics without any trouble. What you have  
14 concentrated on in your study of Dianetics has  
15 been the process of making people well. That is  
16 your emphasis line. But don't think for a  
17 moment that that is any more than half of it.  
18 There is as much data on how to make people  
19 insane, uncomfortable, sick or dead as there is  
20 on how to make them well."

21 A copy of the transcript of this taped lecture is attached hereto  
22 as exhibit 6.

23          55. It is possible that such techniques were used on Fishman,  
24 first to induce him to break the law for Scientology and then to  
25 try to get him to commit suicide, leaving a note absolving the  
26 church of all responsibility. Having failed to do this, church  
27 operatives could have deliberately driven him to the point of a  
28 psychotic break.

1 56. Hubbard explained how to do it in the following passage  
2 from "Some Notes on Black Dianetics":

3 "With Black Dianetics, you could tailor make  
4 any kind of insanity you wanted to. The person  
5 might not manifest this the next day, maybe not  
6 the next week or maybe not for thirty days.  
7 Maybe three months later he is walking down the  
8 street and feeling a little bit tired when  
9 somebody honks an auto horn just right or  
10 something of the sort, and all of a sudden he  
11 goes crazy, and there he is - insane!"

12 57. In that same lecture Hubbard provided a blueprint for  
13 getting someone incarcerated, just as Fishman was, without anyone  
14 ever finding out that the person was set up:

15 "We find that nobody can protest an implanted  
16 engram [meaning a hypnotic command given to a  
17 person such as was portrayed in "The Manchurian  
18 Candidate"] except the person into whom it has  
19 been implanted. He is the only one who can  
20 protest this. He is the only one who can sign  
21 out a warrant. Even if he goes insane, nobody  
22 can sign out a warrant. So he could say, 'Well,  
23 it was Bill and I know it was Bill and I saw  
24 Bill and Bill has taunted me with it since,'  
25 and so forth, but if he has been pronounced  
26 insane... he has lost his civil rights and he  
27 can't issue a warrant. In other words, this is  
28 legal murder, legal punishment and so forth.

1           Because the law does not know anything about  
2           this, no laws exist to prevent it or inhibit  
3           it."

4           58. In another tape called "The Complete Auditor, Part I,"  
5 delivered on June 28, 1951, Hubbard said:

6           "Any one of us could take a human being and,  
7           with malice aforethought, drive him stark,  
8           staring crazy with greater efficiency than even  
9           psychiatry does. What would you do to him? You  
10          would just reverse all the things that you know  
11          would help him: ... slug him with some drugs,  
12          hit him in the face, take a hypodermic needle  
13          to him so that you give him very painful but  
14          unobservable somatics.... Then when he comes  
15          out of it say this had never happened to him,  
16          feed all the content back to him again by  
17          telling him about other people's engrams or  
18          even his own, convince him that he does not  
19          really know what his reality is and convince  
20          him that you are his friend. A person can't  
21          take this; he would spin. That would be an  
22          efficient job, but that could be done on a  
23          person who was pretty doggone sane!"

24          A copy of the transcript of this taped lecture is attached hereto  
25          as exhibit "7".

26          59. In still another tape, called "Outline of Therapy,"  
27 Hubbard stated:

28

1 "Out of Scientology you could formulate a very  
2 fine type of thought warfare. Works much  
3 better than an atom bomb. An atom bomb just  
4 kills people, but you could take thought  
5 warfare and you could enslave them utterly. You  
6 could make complete slaves out of them."

7 A copy of the transcript of this taped lecture is attached hereto as  
8 exhibit 8.

9 60. All of these instructions just quoted are part of the  
10 Scientology "scriptures." Every word Hubbard ever uttered is  
11 considered to be sacred doctrine, and Hubbard's instructions are  
12 taken quite literally by Scientologists. It would be entirely  
13 possible for Scientology operatives to take these instructions  
14 from Hubbard and use them to manipulate Fishman for their own  
15 ends.

16 61. Hubbard himself ordered that "reverse processes" (or  
17 Black Dianetics) be run on people he felt were particularly  
18 dangerous to Scientology. In a 1968 issue he declared several  
19 people fair game (meaning they could be lied to, tricked or  
20 destroyed), and instructed that they be run on reverse processes if  
21 they ever came into an org. Additionally, he ordered that "Any Sea  
22 Org member contacting any of them is to use Auditing Process  
23 R2-45." This was a reference to the use of a .45 semi-automatic  
24 pistol. Hubbard defined R2-45 as a very fast way of getting  
25 someone exterior to their body. A copy of this 'declare' is  
26 attached hereto as exhibit 9 (see item 7).

27 62. Even if no one deliberately set out to drive Fishman  
28 psychotic, selling him materials that would completely overwhelm

1 him with incomprehensible information and then putting an E-meter  
2 in his hands was nothing short of criminal negligence. There is  
3 little doubt that Fishman used his E-meters to "audit" himself, an  
4 action that could easily drive him into a psychotic break.

5 63. In the tape "Some Notes on Black Dianetics," Hubbard  
6 himself described the dangers of self-auditing:

7 "...in Dianetics you are playing around with  
8 highly explosive material. I would say that a  
9 person using Dianetics in certain ways might  
10 much more happily juggle two or three hand  
11 grenades with their pins pulled. For instance,  
12 take some of these people who run around  
13 self-auditing: why don't they just go get a  
14 gun? That is much simpler and quicker."

15 64. When I was in Scientology I was assigned to keep watch  
16 over a young girl in her early twenties who became Type 3 PTS after  
17 being forced to sever all communication with her family, because  
18 they were upset about her involvement in Scientology. This incident  
19 occurred in Hemet, California, at the international headquarters of  
20 Scientology.

21 One day this girl approached me and began to babble, making no  
22 sense at all. Recognizing the symptoms of someone who was going  
23 Type 3, I immediately alerted one of the security guards so that  
24 she could be put under watch. Sure enough, within an hour she was  
25 in a full blown psychotic break. She did not know who she was or  
26 where she was and she began to get violent. She lost touch  
27 completely with the real world and began to hallucinate, imagining  
28 conversations, events, people, and whole scenarios.

1           65. L. Ron Hubbard wrote a series of issues detailing what to  
2 do when someone "goes Type 3." These issues comprise what is  
3 called the Introspection Rundown, a rundown being a series of  
4 specific actions to take to achieve a specific result in  
5 Scientology processing. Hubbard felt that the Introspection  
6 Rundown was a major breakthrough in the handling of psychosis, and  
7 that people in mental institutions could be cured by following  
8 these steps. A copy of the introspection Rundown is attached  
9 hereto as exhibit 10.

10           66. The first step is to isolate the person completely from  
11 everyone except the people assigned to watch over the person. This  
12 is called "Isolation Watch." I was assigned to watch this girl, so  
13 I studied the issues to ensure I would handle her correctly. We  
14 were not to say a word around her. She was to have complete  
15 silence to allow her to calm down (to allow her body thetans to go  
16 back to sleep, although she could not be told about this, since she  
17 was not up to that level in her processing). This went on for many  
18 days as she was in a serious psychotic incident.

19           67. She had no idea who she was. One moment she would think  
20 she was a butterfly; the next minute she would think she was  
21 Hubbard's daughter, Diana Hubbard. Then she would think she was a  
22 dog, and she would bark and growl. We had to be very careful to  
23 watch her so that she would not try to kill herself, and we also  
24 had to be sure she did not get violent and hurt us or become  
25 destructive of property.

26           68. She was never referred to any mental health practitioner,  
27 because Scientologists believe that all psychiatrists and  
28 psychotherapists are completely evil. Hubbard preached the evils

1 of psychiatry so thoroughly that no one in Scientology would ever  
2 consider letting a mental health practitioner examine anyone, even  
3 someone who is in the middle of a psychotic episode. See several  
4 examples of Hubbard's writings on psychiatry attached hereto as  
5 Exhibit 11. This girl was not even given anything to calm her down  
6 except a mixture of calcium and magnesium which was supposed to  
7 relax her and let her sleep. It did not have that effect; this  
8 girl could hardly sleep at all and soon became exhausted, which  
9 simply compounded the problem.

10 69. After several weeks of this, the girl finally came out of  
11 the psychotic episode and was immediately sent back to her family  
12 to avoid a negative public relations situation or, possibly, a  
13 lawsuit.

14 70. A more serious incident occurred when a staff member with  
15 extremely confidential knowledge of the legal and corporate  
16 maneuverings of Scientology became Type 3 PTS. Her name was Cat  
17 Morrow and she had been part of a project called MCSS, for Mission  
18 Corporate Categor Sort-out that was supposed to create a corporate  
19 structure to protect Hubbard from civil or criminal action. Cat  
20 had information about inurement to Hubbard and about a conspiracy  
21 within the church to cover it up that would be disastrous if it  
22 were ever leaked. So when she had a psychotic break it was of the  
23 utmost importance that the situation be kept quiet.

24 71. Cat was taken to the home of a wealthy Scientologist  
25 outside of Los Angeles. The house was surrounded with woods and  
26 there were no other houses in sight. There Cat was kept under 24  
27 hour watch, known as "Isolation Watch" because the person is  
28 isolated from everyone except those on the "watch." Although I was



1 not assigned to watch her, I was told that Cat became extremely  
2 violent on several occasions, that she tried to jump through a  
3 plate glass window, that she repeatedly said she wanted to kill  
4 herself, and that she had no idea who she was or what she was  
5 doing. This went on for several months.

6 72. I was told that when Cat came out of the psychotic break  
7 she was audited on the Introspection Rundown. This is a series of  
8 questions and procedures designed to get the person to stop  
9 introspecting, based on Hubbard's belief that this would cure the  
10 psychosis. On someone who is OT3, as Cat was, the Introspection  
11 Rundown is audited on the body thetans that have gone out of  
12 control and caused the psychotic break. The theory is that once  
13 these body thetans are disengaged from the person's body, the  
14 person will be able to get back in control of his or her own mind  
15 again.

16 73. Maggie Butterworth, David Butterworth's wife, was usually  
17 assigned to supervise any Scientologist in Los Angeles that had a  
18 psychotic break, and I believe that she was in charge of Cat  
19 Morrow, in close liaison with Sandi Wilhere, a highly trained case  
20 supervisor in CSI who is one of the most senior technical experts  
21 in Scientology.

22 74. Cat Morrow's case was particularly sensitive not only  
23 because of the information that Cat had about the church's legal  
24 affairs but also because she was married to Jim Morrow, one of the  
25 key people involved in dealing with the IRS. Cat's psychosis could  
26 not be allowed to compromise Jim's position, so her situation  
27 required the highest security. Normally a staff member who goes  
28 Type 3 is routed off staff or sent to the RPF after coming out of

1 the psychotic episode, but because Cat had dealt with such  
2 sensitive material she was quietly reassigned to a low security  
3 department where people could keep an eye on her and make sure she  
4 remained loyal to Scientology.

5 75. A woman named Dorothy Geary was driven into a psychotic  
6 episode under circumstances very similar to Steven Fishman's in  
7 that she and her husband were coerced into giving Scientology a  
8 tremendous amount of money for services they would never receive.  
9 Her husband Robert, a dentist in Ohio, attended a seminar given by  
10 Sterling Management Systems, which he later discovered was a front  
11 for Scientology. Robert and Dorothy were both coerced into buying  
12 Scientology training and processing after a Scientology "chaplain"  
13 orchestrated a breach between them which threatened their marriage.  
14 Dorothy was then coerced into going to San Francisco for  
15 processing, while her husband flew back to Ohio to continue his  
16 dental practice.

17 76. While Dorothy was in San Francisco she was induced to buy  
18 nearly \$100,000 worth of Scientology materials and services. She  
19 was so overwhelmed from the processing she received and the "hard  
20 sell" she experienced at the hands of Scientology salesman that  
21 after approximately one month she had a psychotic break. She did  
22 not know where she was and was completely out of her mind. Her  
23 husband helped her to get home, but then two Scientologists came to  
24 live at the Gearys' house to try to bring Dorothy out of the  
25 psychotic episode. However, the only "treatment" they provided  
26 consisted of taking Dorothy for long walks.

27 77. Finally they convinced Robert that Dorothy needed to fly  
28 back to San Francisco. Upon arriving in San Francisco, Dorothy was

1 taken to a "mountain retreat," where no one else would see what was  
2 taking place. Dorothy was kept there for two weeks, while her  
3 husband had no idea where she was. Scientologists were trying to  
4 induce Robert to buy more auditing while Dorothy was held in San  
5 Francisco.

6 78. Dorothy had been induced to buy boxes and boxes of  
7 Scientology books and materials, all of which had been shipped to  
8 their home in Ohio after she paid for them with credit cards. When  
9 Robert opened the boxes and read some of the more advanced  
10 Scientology materials, he realized what his wife had been  
11 subjected to and called his family doctor for advice. His doctor  
12 gave a probable diagnosis of an acute psychotic episode caused by  
13 trauma.

14 79. By the time the Gearys' attorney helped them both to  
15 disentangle themselves, they had given Scientology close to  
16 \$180,000. As Robert Geary described it, "This was money we  
17 obviously could not afford to spend and without extreme undue  
18 influence there is absolutely no way we would have ever spent such  
19 sums. I have read a considerable amount about mind control and now  
20 realize that my wife and I were under mind control." A copy of  
21 the declaration of Robert Geary D.D.S. executed September 5, 1993  
22 is attached hereto as exhibit 12.

23 80. There are certain people within the Church of  
24 Scientology, particularly RTC and CSI, who have knowledge of many  
25 other cases of Scientologists having psychotic, Type 3 PTS  
26 episodes. These people include the following: Ray Mithoff, whose  
27 title was Inspector General for Technology in RTC when I left in  
28 1989, although I have been told that he may now have the title of

1 Senior Case Supervisor International in CSI; Gelda Mithoff, a  
2 highly trained auditor who has dealt directly with or supervised a  
3 number of "Type 3 handlings"; Greg Wilhere, whose title was  
4 Inspector General in RTC in 1989 and who is a highly trained  
5 auditor; Sandi Wilhere, a highly trained auditor and case  
6 supervisor in CSI; and, of course, David Miscavige (DM), who  
7 supervises virtually every aspect of Scientology, particularly  
8 anything that might threaten the public image of the church, such  
9 as Scientologists who have Type 3 psychotic breaks.

10 81. The above-named individuals would be able to provide full  
11 details of the symptoms and manifestations of Type 3 PTSness and  
12 would be able to verify that Steven Fishman would never have  
13 qualified for Scientology processing so should never have been  
14 allowed access to Scientology materials or E-meters, certainly not  
15 a solo meter. They can also verify that all of the individuals who  
16 sold these materials to Fishman did so despite the fact that  
17 Fishman had already been declared ineligible for Scientology  
18 processing. The only question that remains to be answered is  
19 whether Fishman was driven to a psychotic break deliberately, or  
20 whether it was done simply out of greed and blatant disregard for  
21 his well-being.

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

25 Executed this 3rd day of January, 1994, at Los Angeles,  
26 California.

27  
28   
Stacy Young

28