

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 for purposes of hearing the accompanying motion in the United States District Court, Central District of California. The statements herein are of my own personal knowledge and if called upon as a witness, I can testify competently thereto.

3. This declaration is submitted in support of Defendant Dr. Geertz's motion for costs, fees, expenses and sanctions following the dismissal of this action with prejudice by the court on February 22, 1994.

4. As a result of my nearly 15 years in Scientology, I am qualified to discuss the policies, procedures and practices of Scientology, including the issue of "of and concerning," plaintiff CSI's assertion that it moved to dismiss this case because of "harassment" by Dr. Geertz's counsel, Scientology's hatred of psychology, Scientology's practice of harassing its critics, the treatment Steven Fishman received at the hands of this organization, and the fact that Miscavige and his lieutenants are managing agents of CSI.

My Extensive History in the Upper Echelons of Scientology Management Qualify Me as an Expert.

5. I was a member of the Church of Scientology for nearly 15 years, from January 1975 until July 1989. From October 1975

1 until I left, I was a member of the Sea Organization, the most
2 dedicated group of Scientologists in the entire organization. I
3 spent most of my time from 1978 until 1989 in a highly
4 confidential section of Scientology management which was known as
5 the Guardian Office until 1982 and is today called the Office of
6 Special Affairs. This section of Scientology is responsible for
7 dealing with all external public relations, all matters relating
8 to civil litigation or criminal matters, all governmental
9 relations such as the IRS, and all critics of Scientology.

10 6. During my tenure in Scientology I acquired extensive
11 knowledge of the Scientology counseling methods known as
12 auditing, the methods of training staff members and public
13 Scientologists, the methods of dealing with non-Scientologists
14 (known as "external publics"), former Scientologists and/or
15 critics, known as enemies or suppressives, and the administrative
16 and management procedures of the organization.

17 7. My first experience with Scientology was at the Mission
18 of Atlanta, Georgia, where I attended a series of introductory
19 lectures about the mind. I received some basic auditing and took
20 several basic courses.

21 8. I joined the Sea Organization ("Sea Org," or "SO") at
22 the Advanced Organization in Los Angeles ("AOLA") in October
23 1975. To become a Sea Org or SO member one must sign a
24 billion-year contract to confirm one's dedication to Scientology
25 and "clearing the planet" (see explanation below).

26 9. All staff members involved in delivering the
27 confidential upper levels of Scientology auditing and all staff
28 members involved in Scientology management must be members of

1 the Sea Org. They live communally and are under the absolute
2 authority of the Sea Org command lines 24 hours a day. I was
3 paid \$24 per week - when I was paid.

4 10. The Sea Org has total authority over all Scientology
5 and Scientology-related organizations, including all nonprofit
6 and for-profit corporations. It cuts across all corporate
7 boundaries and can take over any Scientology organization
8 without notice. Any Scientologist who refuses to submit to Sea
9 Org authority is declared a "suppressive person" and expelled
10 from Scientology.

11 11. All Scientologists consider that Scientology is the
12 only way for Mankind to go free. For a Scientologist this means
13 getting "exterior" to the physical body ("exteriorization") and,
14 indeed, to the entire physical universe. In fact, L. Ron Hubbard
15 created a new category of humanity for those who go through all
16 the levels of Scientology processing; they transcend the state
17 of Homo Sapiens and become what he called Homo Novis (similar to
18 Nietzsche's Superman). Scientologists expect that once they have
19 attained this state they will be free to travel throughout the
20 galaxies, freeing others who are in the trap of the physical
21 universe.

22 12. The route out of the physical universe trap is called
23 "The Bridge to Total Freedom." Every Scientologist is at one
24 stage or another on this Bridge, and they are expected to get
25 everyone else moving on this Bridge as well. The idea is for
26 everyone on Earth to get exterior to the physical universe. The
27 only people who aren't included are "suppressives," meaning
28 those who have been critical of Scientology.

1 13. The Bridge is composed of a series of auditing
2 processes, an auditing process being a set of specific questions
3 and commands. The person who asks these questions and delivers
4 these commands is called the "auditor." The person who answers
5 the questions and carries out the commands is the "preclear,"
6 since the first major milestone on the Bridge is called "going
7 Clear." After one attests to the state of Clear, one moves on to
8 the confidential upper levels of auditing known as the
9 "Operating Thetan" or "OT levels" ("thetan" being Hubbard's term
10 for the person without his or her body).

11 14. At the level of OT 3, one is allowed access to
12 handwritten notes by Hubbard which detail a terrible disaster
13 that happened in this sector of the universe 75 million years
14 ago. The head of the Galactic Federation, whose name was Xenu,
15 solved a massive overpopulation problem by rounding up billions
16 upon billions of people and transporting them in blocks of ice to
17 several volcanoes on Earth, which was known as Teegeeack at the
18 time. They were dumped near the volcanoes and subjected to
19 H-bomb explosions. At the same time, they were subjected to a
20 series of images which were electronically driven, or
21 "implanted," into their minds. After the "implant" was
22 completed, these disembodied beings were transported to Hawaii
23 and Las Palmas where they were packaged up into "clusters."
24 Attached hereto as Exhibit 1 is a copy of the OT 3 materials.

25 15. According to Hubbard, the OT3 implant is rigged to kill
26 anyone who finds out about it before they have received the lower
27 levels of Scientology processing. Needless to say, it is a major
28 revelation to discover that one is covered from head to foot with

1 these disembodied beings, called "body thetans" or "BTs" in
2 Scientology. One has literally millions, or even billions of
3 these BTs, and they have to be audited on very precise processes
4 to get them to wake up and disengage themselves (or "blow") from
5 the person's body. The idea is that once all of these BTs have
6 been gotten rid of, one will be able to exteriorize from the
7 body at will. These BTs can cause illness and even insanity if
8 they become upset, so it is important to get rid of them as
9 quickly as possible and to make sure one has done a very thorough
10 job of it. (See Exhibit 2, "What the Church of Scientology
11 Doesn't Want You to Know," by Jeff Jacobsen and Robert P.J. Day,
12 and "The Total Freedom Trip," by Jon Atack, for more information
13 about the practices of Scientology.)

14 16. I was a staff member at the Advanced Organization of
15 Los Angeles ("AOLA") from October 1975 through December 1978.
16 AOLA is one of a handful of organizations around the world where
17 people can go to receive the confidential upper levels of
18 Scientology processing. I audited hundreds of hours on public
19 preclears as well as staff members to prepare them for their
20 upper levels, or OT levels. (When a person begins their OT
21 levels they no longer have an auditor. They graduate to what is
22 called "solo auditing," a process in which they audit their own
23 BTs.) I also did many security checks on staff members. A
24 security check is a method of inducing a person to confess to
25 crimes, particularly crimes against Scientology.

26 17. In 1977 I was posted as Interne Supervisor at AOLA. In
27 this capacity I supervised auditors-in-training, known as
28 internes, to certify them as qualified professional auditors. To

1 perform this function I had to understand auditing procedures
2 precisely, from the most basic processes to the advanced
3 processes and procedures of Class 6 and Class 8, which are
4 advanced levels of expertise, so that I could recognize whether
5 or not the internes were conducting themselves as proper
6 auditors.

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

11 19. At the end of 1977 I transferred to the United States
12 Guardian's Office ("USGO") in Los Angeles. I was a staff member
13 in the USGO from January 1978 through January 1982. The
14 Guardian's Office was the part of Scientology that handled
15 Public Relations, Intelligence and Legal matters for Scientology.

16 20. Because of my technical background, I was posted as the
17 Organizing Officer ("Org Officer") for the Public Relations
18 Bureau and, later, as the Org Officer for the entire Guardian's
19 Office. As the Org Officer my functions included the handling of
20 all personnel and organizational matters, such as correcting a
21 staff member who made mistakes, taking care of staff members who
22 were sick or upset or in trouble, recruiting new people for
23 staff, and promoting or demoting staff members as needed. I was
24 also responsible for the establishment and proper administration
25 of all the Guardian's Office personnel throughout the United
26 States. Because the Guardian's Office oversaw certain aspects
27 of the administration of all other Scientology organizations, I
28 became very familiar with the overall structure of Scientology

1 and how the various organizations interact with each other and
2 with the outside world.

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

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

17 23. David Miscavige, known as DM, has been the head of
18 Scientology since 1981. His loyalty to L. Ron Hubbard and
19 Scientology is absolute, and he is utterly ruthless about
20 maintaining his power. He moved the seat of power from ASI to
21 the Religious Technology Center (RTC) in 1987, because it was
22 more defensible to run Scientology from a non-profit corporation
23 than from a for-profit corporation. At that point he appointed
24 himself Chairman of the Board of RTC ("COB RTC"), which is his
25 current title.

26 24. Although ASI was established as a for-profit,
27 non-religious corporation, in reality while DM was COB ASI the
28 staff of ASI ran the entire Scientology network. ASI had complete

1 control over the management of all Scientology orgs and missions,
2 all Office of Special Affairs activities, all transfers of funds
3 between church accounts and LRH accounts, every aspect of the
4 life of anyone who was a Scientologist, whether staff or public.
5 These powers were moved to RTC in 1987, as explained above.

6 25. Because of my experience in ASI I am familiar with the
7 day-to-day activities and procedures of the highest levels of
8 management of Scientology.

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

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

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

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

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

24 31. In August 1984 I was transferred back to the PR
25 Division of the Guardian's Office, which by that time had been
26 renamed the Office of Special Affairs. My primary functions were
27 as a writer and editor for FREEDOM Magazine, a Scientology
28 publication created to serve as a vehicle for attacking

1 individuals and groups who were perceived as threats to
2 Scientology. I also wrote articles for other Scientology
3 publications.

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

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

23 34. In July 1989 my husband and I left Scientology. We
24 lived in San Diego from 1989 until August 1991, at which time we
25 moved to Newport Beach. We are currently living in Corona del
26 Mar, California, which is part of Newport Beach.

1 CSI Had no Standing to File This Case.

2 35. As described above, I spent nearly 13 years at the
3 highest echelons of Scientology management. My experience
4 includes substantial time in the Guardian's Office("GO"), its
5 succesor, the Office of Special Affairs ("OSA"), and also at
6 Author Services, Inc. ("ASI").

7 36. The GO/OSA branch of Scientology is responsible for
8 dealing with all matters outside the confines of the cult itself,
9 particularly public relations, litigation, gathering of
10 intelligence information on critics, carrying out harassment and
11 intimidation campaigns on critics, etc. The GO/OSA branch is
12 also responsible for maintaining the facade of corporate
13 integrity for the benefit of the courts, the Internal Revenue
14 Service ("IRS") and other governmental agencies.

15 37. ASI is a for-profit corporation with offices in
16 Hollywood, California. ASI manages all of L. Ron Hubbard's
17 ("Hubbard") literary affairs. ASI was first created in 1982. To
18 this day ASI accepts only proven members of the Sea Organization
19 ("Sea Org"), an unincorporated organization which, under the
20 leadership of David Miscavige ("Miscavige"), actually runs all of
21 Scientology.

22 38. When ASI was created, it managed the entire Scientology
23 empire. Miscavige arrogated the corporate title of Chairman of
24 the Board of ASI ("COB ASI") to himself.

25 39. In 1987, Miscavige moved his base of operations from
26 the ASI facility in Hollywood to the high-security Scientology
27 compound near Hemet, California. In conjunction with this move,
28 Miscavige gave himself the new title of Chairman of the Board of

1 Religious Technology Center ("COB RTC"). In reality, Miscavige's
2 power is such that he can give himself whatever title he wants in
3 whatever corporation he chooses.

4 40. I know from my personal experience in GO/OSA and in ASI
5 that the corporate structure of Scientology is purely to obtain
6 legal and tax advantages. When Hubbard was still alive, the
7 complex corporate structure also served as a shield to protect
8 Hubbard from litigation and criminal charges. The corporate
9 integrity has certainly never been a matter of interest to anyone
10 outside of the GO/OSA or its senior echelons, such as RTC or ASI.
11 The corporate structure is not a matter of interest or concern
12 within the cult itself. Most Scientologists do not think of
13 Scientology in corporate terms at all. Instead of thinking of
14 plaintiff Church of Scientology International ("CSI") or any
15 other corporate entity when Scientology is mentioned,
16 Scientologists think of all the organizations which apply the
17 Hubbard Technology. Those organizations which apply the Hubbard
18 Technology include the geographically located Churches of
19 Scientology (e.g., Church of Scientology of San Francisco, Church
20 of Scientology of Miami, etc.), the geographically located
21 missions (e.g., Church of Scientology, Mission of Ft. Lauderdale,
22 etc.), the management organizations (e.g., RTC and CMO Int), the
23 public self-improvement organizations which apply the Hubbard
24 Tech (e.g., WISE, Narconon, Sterling Management, etc.), the front
25 groups with political action agendas (e.g., Citizens Commission
26 for Human Rights, etc.), and the autonomous, extra-corporate
27 organizations for administrative and money management (e.g., Sea
28 Org and Flag Banking Office, etc.)

1 41. In short, even dedicated Scientologists would not think
2 of CSI when they read about "Scientology" or "Scientologists,"
3 such as in the two paragraphs of the May 1991 Time Magazine
4 article which are the subject of this litigation. Additionally,
5 even a Scientologist would not think of CSI if he or she read
6 something about the "church" in material referring to
7 Scientology. Certainly no one outside of the Scientology cult
8 would think of CSI when reading about "Scientology,"
9 "Scientologists," or the "church," for the obvious reason that no
10 one outside of Scientology is likely to have heard of CSI as
11 distinct from Scientology as a general, generic amalgam of
12 organizations. Indeed, since CSI was created in late 1981 and
13 throughout my tenure at the upper echelons of Scientology, I
14 found that only a small circle of Scientologists, in OSA and the
15 senior management such as RTC and ASI, made reference to CSI on a
16 regular basis. These are the persons who need to maintain the
17 facade of corporate separateness to the outside world so as to
18 obtain various tax and litigation advantages.

19 42. For CSI to claim that the words "Scientology,"
20 "Scientologist" and/or "the church," as they appear in that
21 portion of the Time Magazine article which mentions Dr. Geertz
22 and Mr. Fishman, are "of and concerning" CSI is disingenuous in
23 the extreme. Based on my education, training and experience in
24 Scientology, the words "Scientology," "Scientologist" and "the
25 church" as they appear in the Time Magazine article can only be
26 reasonably understood to refer to Scientology generally,
27 generically and without particular reference to any one of the
28 hundreds of Scientology corporations that have been established

1 for various purposes over the years. The vast majority of the
2 corporate entities do not appear on the Scientology command
3 chart. The fact that separate corporations exist on paper has no
4 effect on the daily life of Scientologists or the operation of
5 Scientology. The corporate boundaries are ignored.

6 43. When I was a staff member in the GO, ASI and later OSA,
7 it was common knowledge that the corporate structure was a
8 contrivance created purely because of the tactical benefits it
9 bestowed on Scientology for purposes of interfacing with the
10 "wog" world. All Scientologists, particularly Sea Org members,
11 regard the Sea Org as an elite group of superior beings whose job
12 it is to get everyone else in the world into Scientology.

13 Meanwhile, Sea Org members and Scientologists generally refer
14 laughingly to unenlightened non-Scientologists as "wogs."

15 44. To get along with these wogs and keep them from
16 hindering the forward progress of Scientology, it is necessary to
17 create the appearance that Scientology operates by the same rules
18 as the rest of society. A large part of OSA's role is to
19 maintain this facade through public relations and legal actions.
20 In fact, Scientologists think it is quite funny when wogs accept
21 the facade as real. The arrogance of Scientology's senior
22 management, and the contempt in which it holds any court or other
23 wog body which falls for the masquerade is astounding.

24 45. The contempt became apparent to me in conversations I
25 had with other staff, in comments made by Miscavige, Norman
26 Starkey, Lyman Spurlock, Steve Marlowe, and other executives
27 during staff meetings, and in instructions I was given about how
28 to position certain agencies and individuals when I wrote stories

1 for Scientology propaganda publications, including FREEDOM
2 Magazine.

3 46. I was in the FREEDOM Magazine department of the public
4 relations division of OSA US during the trial of Wollersheim v.
5 Church of Scientology of California, in 1985. At the time, OSA
6 US was still, for corporate purposes, part of the Church of
7 Scientology of California ("CSC").

8 47. One afternoon, I was informed, along with the other
9 staff members of the FREEDOM office, that our office was to be
10 moved to another location across the street, outside the big blue
11 Scientology complex which used to be Cedars of Lebanon Hospital
12 at Sunset and Berendo in Hollywood, California. We were
13 instructed to move to an office on the second floor of a building
14 on Catalina Street. I was told that the FREEDOM office and the
15 Treasury office of OSA US were to move out of the Scientology
16 Complex because it looked like Lawrence Wollersheim was going to
17 win his suit against CSC and the corporation had to be gutted of
18 all its assets before the decision was handed down. All that
19 would be left of CSC would be a shell consisting of a Treasury
20 office and the FREEDOM office. When Wollersheim tried to collect
21 from CSC, he would discover that there were no assets at all in
22 CSC.

23 48. We did move our office to the building on Catalina.
24 The Treasury office also moved. I was told by the Treasury
25 Secretary, Rhea Smith, that all of the assets of CSC had been
26 taken out of the CSC accounts. The motto of OSA US during the
27 Wollersheim trial was "Not One Thin Dime," meaning Scientology
28 would never pay even a dime to Lawrence Wollersheim. The OSA US

1 staff were briefed on the gutting of CSC at a staff meeting, and
2 all of the staff cheered because now Wollersheim couldn't get his
3 hands on any money even if he won his suit.

4 49. This gutting of CSC to hide assets from a litigant and
5 then cheering about it at a staff meeting is an example of the
6 contempt in which the Scientology Command holds the U.S. justice
7 system. The corporate structure of Scientology is created and
8 re-created depending upon the convenience of the moment, as
9 illustrated in the above example.

10 50. The idea that the remarks attributed to Fishman and
11 Geertz in the Time Magazine article upon which CSI's claims are
12 purportedly based refer to CSI rather than to Scientology
13 generally is absurd. Inside the Scientology empire no one takes
14 the corporate structure seriously. The corporate structure is a
15 contrivance to enable Scientology to interface to its advantage
16 with the "wog" world. This Court should not be fooled by the
17 corporate sleight of hand which was attempted in this case.
18 "Scientology," "Scientologist" and "the church" refer to the
19 overall, generic empire of Scientology, not to CSI, and no one
20 even within Scientology would think of CSI when reading those
21 words, much less the general public.

22 **It is CSI That is Harassing, Not the Defendants**

23 51. CSI asserted that this case must be dismissed to
24 protect several Scientology celebrities who were noticed for
25 brief depositions not to exceed two hours each. CSI claims that
26 these celebrities were served for the express purpose of
27 harassment and abuse. CSI asserted that it feared these
28 celebrities would be exposed to confidential upper level

1 materials if CSI allowed them to be deposed. CSI further asserted
2 that "CSI has seen its religious tenets and scriptures assailed;
3 it has been compelled to produce or offer for deposition the
4 religion's most senior ecclesiastical leaders so they can be
5 reviled; and it has endured a transparent campaign to harass CSI
6 into default." CSI cited this as its excuse to move to dismiss
7 this entire case.

8 52. Nothing could be further from the truth. The CSI manag-
9 ing agents and the other Scientologists who have been deposed in
10 this case have been interrogated only about the use and misuse of
11 L. Ron Hubbard's technology ("Tech") for secular purposes. The
12 fact that the same Tech is also used for so-called religious
13 purposes does not make inquiry about the Tech a reviling of the
14 Scientology belief system or its most senior members.

15 53. Even I, who spent many years helping to create this
16 kind of utterly hypocritical rhetoric for the Church of Scientol-
17 ogy, am stunned at this latest fantasy concocted by CSI.

18 54. Dr. Geertz's attorneys have never expressed in my
19 presence any intention whatsoever to bring up Scientology's
20 confidential upper level materials during the deposition of the
21 Scientology celebrities. I have been advising Graham Berry and
22 Gordon Calhoun, Dr. Geertz's attorneys, as an expert consultant
23 on Scientology Tech matters. I would know from the type of advice
24 and guidance they have sought from me whether they intended to
25 inquire about the "religious" or "ecclesiastical" uses of the
26 Tech as opposed to the secular use of the Tech. Their inquiries
27 have been limited to secular uses of the Tech. Why should they
28 ask these people about Scientology's confidential upper level

1 materials? There would be no point in bringing up those
2 materials. For the Scientologists to assert a concern over this
3 is simply another example of their assuming that others will use
4 their own harassing tactics. In fact, I advised Dr. Geertz's
5 attorneys to depose the Scientology celebrities about the lack of
6 corporate boundaries in Scientology. Miscavige, COB RTC, insists
7 upon treating all the celebrities with kid gloves and personally
8 oversees their progress in Scientology, sending RTC, Cmo Int or
9 Gold specialists to take care of their needs regardless of any
10 supposed corporate structure.

11 55. What is astonishing to me is the incredible arrogance
12 of CSI in accusing Dr. Geertz and his counsel of exactly those
13 actions in which CSI regularly engages. It is not the defendants
14 Dr. Geertz and Mr. Fishman who have been conducting an all-out
15 campaign of harassment, assault and vilification; it is CSI that
16 has been doing so. Indeed, the leadership of CSI has no choice
17 but to do so. CSI's leadership is bound to do so by Scientology
18 doctrine. CSI's leadership would be acting heretically or
19 unorthodoxly if it did otherwise. Founder L. Ron Hubbard, whose
20 edicts on these subjects are "sacred scripture" which must be
21 implemented without question or reservation, gave specific
22 instructions to harass and destroy anyone perceived as an enemy
23 of Scientology. There are many, many policy statements by
24 Hubbard, which bind all Scientologists, that go into this. What
25 follows are only a few examples.

26 CSI Is Bound by Its Own Scripture to Harass Its Critics

27 56. Hubbard wrote "The Scientologist: A Manual of
28 Dissemination of Material" (attached as Exhibit 3, see p. 157) in

1 1955. He gave the following instructions for dealing with anyone
2 who sought to compete with orthodox Scientology:

3 "The purpose of the suit is to harass and discourage
4 rather than to win. The law can be used very easily to
5 harass, and enough harassment on somebody who is simply
6 on the thin edge anyway, well knowing that he is not
7 authorized, will generally be sufficient to cause his
8 professional decease. If possible, of course, ruin him
9 utterly."

10 57. Hubbard also urged Scientologists to employ private
11 detectives to investigate anyone who criticized Scientology. He
12 added, in language particularly apropos to this lawsuit:

13 "... we should be very alert to sue for slander at the
14 slightest chance so as to discourage the public press
15 from mentioning Scientology."

16 58. In 1959 Hubbard published the "Manual of Justice" for
17 Scientology (attached as Exhibit 4). This document instructs
18 Scientologists as follows:

19 "People attack Scientology; I never forget it, always
20 even the score....

21 "When we need somebody haunted we investigate.... When
22 we investigate we do so noisily always. And usually
23 investigation damps out the trouble even when we
24 discover no really pertinent facts. Remember that *by*
25 *investigation alone* we can curb pushes and crush
26 wildcat people and unethical 'Dianetics and
27 Scientology' organizations....

28 ///

1 "Of twenty-one persons found attacking Dianetics and
2 Scientology... eighteen of them under investigation
3 were found to be members of the Communist Party or
4 criminals, usually both. The smell of police or private
5 detectives caused them to fly, to close down, to
6 confess. Hire [private detectives] and damn the cost
7 when you need to."

8 59. As author Jon Atack wrote in his well-researched book,
9 *A Piece of Blue Sky: Dianetics, Scientology and L. Ron Hubbard*
10 *Exposed:*

11 "A mood was being created in which staff members would
12 become 'deployable agents,' as sociologist Roy Wallis
13 called Hubbard's henchman in his excellent study of
14 Scientology. After all, Hubbard never gave any
15 indication of the possibility that a complaint against
16 him or against Scientology could be justifiable. The
17 tactic of 'noisy investigation' originated in the
18 Manual, and came to mean harassment by defamation.
19 Hubbard certainly did not mind if the defamation was
20 grossly exaggerated, or even a total fabrication. If
21 you throw enough mud, some will stick. The Manual of
22 Justice suggests outright blackmail." (The section of
23 the book which contains this passage is attached as
24 Exhibit 5.)

25 60. In 1960 Hubbard wrote another policy called "The
26 Department of Government Affairs" (attached as Exhibit 6), which
27 stated, in part:

28 ///

1 ". . . Only attacks resolve threats.

2 "In the face of danger from Govts or courts there are
3 only two errors one can make: (a) do nothing and (b)
4 defend. The right things to do with any threat are to
5 (1) Find out if we want to play the offered game or
6 not, (2) If not, derail the offered game with a feint
7 or attack upon the most vulnerable point which can be
8 disclosed in the enemy ranks, (3) Make enough threat or
9 clamor to cause the enemy to quail, (4) Don't try to
10 get any money out of it, (5) Make every attack by us
11 also sell Scientology and (6) Win. . . .

12 "The goal of the department is to bring the government
13 and hostile philosophies or societies into a state of
14 complete compliance with the goals of Scientology. This
15 is done by high level ability to control, and in its
16 absence, by low level ability to overwhelm. Introvert
17 such agencies. Control such agencies. Scientology is
18 the only game on Earth where everybody wins. There is
19 no overt in bringing good order."

20 61. In other words, only activities which promote the
21 expansion of Scientology or which attack and injure its critics
22 are good or ethical by Scientology standards. Any attack or
23 injury to the enemies of Scientology is justified. The end,
24 universal acceptance of the Scientology belief system, justifies
25 the means, attacking or injuring enemies of Scientology,
26 particularly psychiatrists, psychologists and those who have
27 criticized Scientology.

28 ///

1 62. In another policy statement called "Attacks on
2 Scientology (Additional Policy Letter)" (attached as Exhibit 7)
3 Hubbard instructed Scientologists to:

4 "(1) Spot who is attacking us."

5 "(2) Start investigating them promptly for FELONIES or
6 worse using our own professionals, not outside
7 agencies."

8 "(3) Double curve our reply by saying we welcome an
9 investigation of them."

10 "(4) Start feeding lurid blood, sex, crime actual
11 evidence [sic] on the attackers to the press."

12 63. Each of the documents authored by Hubbard are still
13 part of the Scientology doctrine today. In fact, these documents,
14 along with many others, comprise the heart and soul of the
15 activities of the Office of Special Affairs (formerly the
16 Guardian's Office).

17 64. In Scientology, Hubbard's instructions must be followed
18 exactly, with no deviation. These documents and others with
19 similar instructions to harass have been followed in this lawsuit
20 and all the other lawsuits in which Scientology has been
21 involved.

22 65. The Scientologists accuse defendants Dr. Geertz and Mr.
23 Fishman of harassing tactics. Yet it is the Scientologists who
24 are compelled by their most fundamental scriptures to harass
25 perceived enemies of Scientology unceasingly, including judges,
26 defendants, their counsel and the Scientology experts retained in
27 this case.

28 ///

1 66. The Hon. Ronald E. Swearinger became a target of
2 Scientology harassment while he was presiding over the case of
3 Larry Wollersheim v. Church of Scientology of California, #C 332
4 027. In the document attached as Exhibit 8, "Linda" is Linda
5 Hamel, who was In-Charge of the "Mission Find the Crimes" ("MFTC
6 I/C") in OSA, which was run directly by "Marty," who is Marty
7 Rathbun, Inspector General for Ethics in RTC.

8 67. My husband Robert Vaughn Young and I have been harassed
9 and intimidated repeatedly since we became experts in this case.
10 Scientology operatives have stolen our trash. They have
11 slandered us to former associates. They have called us at all
12 hours of the night. High-level OSA operative Kurt Weiland sent
13 my husband a threatening letter. We have been followed and
14 surveilled on several occasions when we were able to spot the
15 person following or surveilling us; we have no idea how much more
16 surveillance we have been subjected to by operatives skilled
17 enough to avoid being spotted. On one occasion we were followed
18 more than 100 miles from our home by a Scientology agent. My
19 husband spotted the agent and stopped our car, at which point the
20 agent pulled in behind us and stopped his car as well. My
21 husband walked over and asked him outright if he was a
22 Scientologist, whereupon he admitted that he was from the high-
23 security Scientology compound in Hemet and that he was following
24 us under orders from Scientology Command.

25 68. These actions are imbedded in the doctrine of
26 Scientology. Scientologists have no choice but to adhere to these
27 policies.

28 ///

1 CSI is Accusing the Defendants of Its Own Criminal
2 Activities

3 69. L. Ron Hubbard invented a name for someone who accuses
4 others of crimes that he himself has committed. In fact, Hubbard
5 wrote a bulletin about this, which he called "The Criminal Mind."
6 Ironically, Hubbard described himself and his alter ego, the Sea
7 Organization, when he wrote that "THE CRIMINAL ONLY SEES OTHERS
8 AS HE HIMSELF IS."

9 70. The thinking behind CSI's motion to dismiss is best
10 explained by quoting Hubbard himself:

11 "Apparently they add it up this way: 'If I accuse him
12 of robbing, then it would be assumed by others that I
13 have not robbed a bank.' By loudly voicing a
14 condemnation of a crime, the criminal, with a crooked
15 think, supposes people will now suppose he is above
16 bank robbery and won't suspect him." (A copy of "The
17 Criminal Mind" is attached as Exhibit 9.)

18 Scientology Doctrine Requires That Psychiatrists and
19 Psychologists Must be Destroyed

20 71. There is another aspect of the Scientology doctrine
21 which is highly relevant to this case, because Dr. Geertz is a
22 psychologist. Scientologists are taught that psychiatrists and
23 psychologists are the root of all evil in the world. According to
24 Hubbard, psychiatry and psychology are behind a massive
25 conspiracy to destroy Scientology and, with it, man's only hope
26 for salvation. Therefore, all psychiatrists and psychologists,
27 including Dr. Geertz, are Fair Game as far as Scientologists are
28 concerned.

1 72. Hubbard taught that the world must be protected from
2 psychologists and psychiatrists at all costs. Hubbard wrote many,
3 many scriptures and recorded many lectures in which he vilified,
4 ridiculed, attacked, and blamed all the ills of the world on the
5 mental health profession.

6 73. The vitriol in Hubbard's attacks has three sources.
7 First, much to Hubbard's surprise and chagrin, the mental health
8 profession did not embrace either Hubbard or Dianetics, Hubbard's
9 "Science of Mental Health." Second, and even more offensive to
10 Hubbard, was the fact that his often dangerous techniques were
11 labeled as quackery. Third, and perhaps most important, Hubbard
12 regarded the mental health profession as a well-established and
13 deeply entrenched competitor for monies which might otherwise
14 flow to him and to Scientology.

15 74. The following sampling makes clear the degree of
16 Hubbard's loathing and contempt for these professions, and shows
17 that Scientologists will stop at nothing short of total
18 obliteration of these professions.

19 75. In 1970 Hubbard wrote "The Psychiatrist at Work"
20 (attached as Exhibit 10). He attacks psychiatry as follows:

21 ". . . psychiatry is making insane people.

22 "This is why the insanity statistic is soaring and why
23 the crime statistic is on a wild climb....

24 "The psychiatrist has masters. His principal
25 organization, World Federation of Mental Health, and
26 its members, the National Associations of Mental

27 ///

28 ///

1 Health, the 'American' Psychiatric Association and the
2 'American' Psychological Association, are directly connected
3 to Russia. . . .

4 "It goes without saying that the savagery and fraud of
5 psychiatry must cease and that auditors must encourage
6 in state and public and through all their connections
7 displacing psychiatric abuses with sane auditing."

8 76. Obviously, psychiatrists and psychologists were evil
9 because their services competed with Scientology auditing. In a
10 1971 document by Hubbard called "Confidential" (attached as
11 Exhibit 11), he wrote:

12 "Policy is that we assign any case or upset in
13 Scientology to past damage and interference with the
14 person by medicine or psychiatry. They were sent to us
15 after medicine or psychiatry had already destroyed
16 them. We cannot be blamed for psychiatric or medical
17 failures.

18 "By continually repeating this, make the AMA, Nats
19 [National Associations of Mental Health], etc. very
20 wary of using our name on these psychiatric and medical
21 failures. Both subjects are guilty and the statement is
22 demonstrably true. Use it often. Make it known to the
23 enemy that this is our policy as a restraint on their
24 fetid imaginations: 'Every time you attack us we will
25 disclose more records of your failures.'"

26 77. In another 1971 document of the same date, entitled
27 "For Public Advices" (attached as Exhibit 12), Hubbard wrote:

28 ///

1 "It is time we begin to label Psychiatry for what it
2 is, the greatest failure of the Nineteenth Century.
3 Every notorious criminal and defector of the Twentieth
4 Century was in psychiatric hands before the crime.
5 Burgess, MacLean, the Texas Tower murderer, Manson and
6 all the rest were psychiatric failures first. Every
7 infamous modern assassin was a psychiatric failure.
8 Psychiatric victims are endless trouble to our society.
9 We are tracing social turmoil, unrest, widespread drug
10 addiction to psychiatry.

11 "We wish to issue a public warning that psychiatry
12 kills. We in Scientology stand ready to help anyone,
13 and help Governments rid themselves of psychiatric
14 crime. There is urgency in this. In too many cases we
15 are asked to repair persons already maimed beyond human
16 tolerance by psychiatric interference and brutality. We
17 blame psychiatric failure for the state of modern
18 society. We will do all we can to help, but Nineteenth
19 Century Psychiatry must go. We have never had a failure
20 or upset that psychiatry had not first ruined."

21 78. In 1980 Hubbard wrote "Criminals and Psychiatry"
22 (attached as Exhibit 13). In it Hubbard said:

23 "Almost every modern horror crime was committed by a
24 known criminal who had been in and out of the hands of
25 psychiatrists and psychologists, often many times....

26 "The most charitable look at this would be that the
27 psychologists and psychiatrists are simply incompetent.
28 But other more sinister implications can be drawn.

1 "Developed in the latter part of the nineteenth
2 century, they appeared on the militaristic scene of a
3 rearming and conquest-minded Germany. At that time, the
4 archcriminal Bismarck was laying the groundwork for the
5 slaughters of World War I and World War II. It fitted
6 with the philosophy of militarism that man was an
7 animal and that there was neither soul nor morality
8 standing in the way of the wholesale murder of war.
9 "Up until that time the Church had some influence on
10 the state and possibly some power in restraining
11 bestiality and savagely insane conduct, but small as it
12 might have been, it was incompatible with the unholy
13 ambitions of the militarists. That man was only an
14 animal after all, soulless and entitled to no decency,
15 was bound to be a popular doctrine. That insanity
16 consisted of urges to harm others would have been a
17 very unpopular idea to government heads who had nothing
18 else in mind. . . .

19 "Spawned by an insanely militaristic government,
20 psychiatry and psychology find avid support from
21 oppressive and domineering governments....

22 "The credence and power of psychiatry and psychology
23 are waning. It hit its zenith about 1960; then it
24 seemed their word was law and that they could harm,
25 injure and kill patients without restraint. The
26 appearance of an actual technology of the mind--
27 Dianetics and Scientology--has played no small part in
28 acting as a restraint. At one time they were well on

1 their way to turning every baby into a future robot for
2 the manipulation of the state and every society into a
3 madhouse of crime and immorality. . . .

4 "The world is turning, things change. And there may
5 come a day when the mad dogs of the world are not given
6 over to the charge of mad dogs. But that will be to the
7 degree that you successfully carry forward Dianetics
8 and Scientology."

9 79. In a 1981 document called "Dianetics and Scientology
10 Compared to 19th Century Practices" (attached as Exhibit 14),
11 Hubbard wrote:

12 "A comparison between Dianetics and Scientology and
13 psychology and psychiatry is nonsense.

14 "The two 19th century subjects, psychology and psychiatry,
15 do not achieve ANY good results. On the contrary they are
16 destructive beyond belief. They make crackpots, sexpots and
17 vegetables when they do not outright kill....

18 "The character of the Governments themselves is
19 established by their tolerance and use of psychology
20 and psychiatry. In no human race of any civilized
21 repute has any law condoned broad mayhem and murder of
22 their populations. Yet under modern governments
23 psychology and psychiatry not only have carte blanche
24 but also get insistence on their use....

25 "Is this a civilized world we're living in?

26 "I'm afraid it only will be when Dianetics and
27 Scientology can bring wisdom enough to Man to blunt his
28 furious efforts to do himself in."

1 80. In 1982 Hubbard wrote "The Criminal Mind and the
2 Psychs" (attached as Exhibit 15), which states, in part:

3 "It has often been noted (and routinely reported in the
4 papers) that criminals 'treated' by psychologists and
5 psychiatrists go out and commit crimes.

6 "It could be suspected that these 'practitioners' used
7 pain-drug-hypnosis and other means (under the guise of
8 treatment) to induce the criminal to go out and commit
9 more crimes. And possibly they do....

10 "So let us look at psychs again -- what they call
11 'treatment' is a suppression (by shocks, drugs, etc.)
12 of the ability to think. They are not honest enough,
13 these psychs, being just dramatizing psychotics
14 themselves for the most part, to publish the fact that
15 all their 'treatments' (mayhem, really, when it is not
16 murder) make people more stupid....

17 "The answer to crime is rising IQ. But only the
18 Scientologist can do that."

19 81. In another 1982 document called "The Cause of Crime"
20 (attached as Exhibit 16), Hubbard wrote:

21 ". . . So what IS the cause of crime? The treatment, of
22 course! Electric shocks, behavior modification, abuse
23 of the soul. These are the causes of crime. There would
24 be no criminals at all if the psychs had not begun to
25 oppress beings into vengeance against society.

26 "There's only one remedy for crime--get rid of the
27 psychs! They are causing it!...

28 ///

1 "The psychs should not be let to get away with
2 'treatment' which amounts to criminal acts, mayhem and
3 murder. They are not above the law. In fact, there are
4 no laws at all which protect them, for what sane
5 society would sanction crime against its citizens even
6 as science? They should be handled like any other
7 criminals. They are at best dramatizing psychotics and
8 dangerous, but more dangerous to society at large than
9 the psychotics they keep in their offices and loony
10 bins because they lie and are treacherous. Why the
11 government funds them I do not know. They are the last
12 ones that should be let loose to handle children."

13 82. In another 1982 document entitled "Pain and Sex"
14 (attached as Exhibit 17), Hubbard announced that psychiatrists
15 and psychologists (collectively called "psychs") had been behind
16 all of our troubles for millennia (and he also revealed his
17 bizarre view of sexuality):

18 "There are two items in this universe that cause more
19 trouble than many others combined.

20 "One is PAIN.

21 "The other is SEX....

22 "Despite the false data of Freud, psychologists,
23 psychiatrists and other criminals, they are not native
24 to a being. They are only artificial wavelengths. They
25 have exact frequencies that can be manufactured....

26 "Destructive creatures who do not want people big or
27 reaching--since they are terrified of punishment due to
28 their crimes--invented pain and sex to shrink people

1 and cut their alertness, knowingness, power and
2 reach....

3 "Pain and sex were INVENTED tools of degradation....

4 "Combined, pain and sex make up the insane
5 Jack-the-Rippers (who killed only prostitutes) and the
6 whole strange body of sex murder freaks, including
7 Hinckley [who shot President Reagan], and the devotees
8 of late night horror movies. Under the false data of
9 the psychs (who have been on the track a long time and
10 are the sole cause of decline in this universe) both
11 pain and sex are gaining ground in this society and,
12 coupled with robbery (which is a hooded companion of
13 both), may very soon make the land a true jungle of
14 crime.

15 "Go into any asylum or a prison and look at the
16 increasing institutional population and know what you
17 are looking at. In the main, these are pain and sex
18 addicts, decadent and degraded and no longer capable.
19 They were sent on that route down through the ages by
20 the psychs and here they are still in the psych's
21 hands! And do they get well or go straight? Oh no.
22 Whether in prisons or insane asylums, they just get
23 worse. And the psychs in both places rub their bloodied
24 hands as they turn their products loose again upon the
25 remaining population! It's no accident. And the
26 stocks-in-trade of psychs are PAIN and SEX."

27 83. There are many, many more documents and tapes which
28 comprise Scientology doctrine about the evils of psychiatry and

1 psychology. As far as the Scientologists are concerned, the world
2 would be much better off if all the psychiatrists and
3 psychologists were to disappear, leaving Scientology to move into
4 the field of mental health and take it over. The Scientologists
5 actually believe that this would be the best thing that could
6 happen to humankind.

7 84. Furthermore, as far as the Scientologists are
8 concerned, anyone who would subject himself voluntarily to years
9 of hypnosis, as Mr. Fishman did, is already so far gone that
10 there is really nothing that can help him. Orthodox Scientology
11 holds that a person as damaged by psychology as Scientologists
12 believe Mr. Fishman to be might as well drop his current body,
13 pick up another body and start over again.

14 85. So these two people, Dr. Geertz and Mr. Fishman, are so
15 degraded by choice of profession and decision to seek help from a
16 conventional mental health professional that each of them is
17 infinitely expendable in the eyes of Scientology. See Exhibit 2
18 for an example of the kind of treatment a psychiatrist who
19 publicly criticizes Scientology can expect from a Scientologist.

20 **Fishman's Experience in Scientology Drove Him to a Psychotic**
21 **Break.**

22 86. I have read Steven Fishman's book, The Lonesome
23 Squirrel, and I have reviewed his testimony up to his sentencing.
24 I have viewed a 1981 videotape of Fishman under hypnosis by Dr.
25 Uwe Geertz, and I have viewed a 1989 videotape of Fishman being
26 interviewed by his attorney Mark Nurik and Dr. Richard Ofshe in
27 Fishman's home in Florida. Based on the review of these
28 materials and my knowledge and experience in Scientology, I do

1 not believe there is any doubt that Steven Fishman was driven to
2 a psychotic break (known in Scientology as "Type 3 PTS," a term
3 which I will explain below) by Scientologists, either
4 deliberately or through greed and gross negligence of his
5 welfare.

6 87. It is utterly forbidden for anyone with a serious
7 psychiatric background, including an extensive history of
8 hypnosis such as Fishman had, to be allowed to have any
9 Scientology processing at all. Attached hereto as Exhibit 19 is
10 a copy of Hubbard Commincation policy letter entitled "Illegal
11 PCs, Acceptance of High Crime PL." I have been advised by Mr.
12 Berry that it was well known by Scientology operatives that
13 Fishman was not eligible for processing because of his history
14 of therapy with Dr. Uwe Geertz; yet he was induced to buy more
15 than \$100,000 worth of Scientology books, written materials,
16 prints and E-Meters, clearly being led to believe that he would
17 be welcomed into the privileged circle of dedicated
18 Scientologists.

19 88. It is highly significant that he was induced to
20 purchase three E-meters (electro-psychometers), the device used
21 in Scientology auditing. E-meters are not used for anything else
22 but auditing, and they are not supposed to be sold to anyone
23 without proof that they are in training as an auditor.

24 89. But in the Scientology world there is a thing called
25 statistics, and Fishman was an unsuspecting victim of this
26 system. Every single staff member in a Scientology organization
27 has a statistic which measures his or her production. These
28 statistics are reported every Thursday to International

1 Management in CSI and RTC. For Scientology staff members, their
2 lives virtually revolve around making sure their statistics are
3 rising every week. Many things depend upon this. If their stats
4 are down they may not be paid that week. They may not be allowed
5 to spend any time with their spouse or children. They may not be
6 allowed any time off at all, and since they already work as much
7 as 14 to 18 hours a day or more, one day or even half a day off
8 becomes very important, even if it is only enough time to do
9 laundry. If their stats continue to go down over a period of
10 time, they risk being assigned to the Rehabilitation Project
11 Force or "RPF," which is a Scientology prison camp. Needless to
12 say, people can become quite desperate under these circumstances,
13 and they will do just about anything to get their statistics up.

14 90. Nowhere in Scientology is the push for statistics more
15 frenzied than in the departments responsible for bringing money
16 into the organization. Unfortunately Fishman appears to have
17 been the unwitting victim of a feeding frenzy which involved at
18 least nine different Scientology corporations. These people
19 discovered that Fishman had money and that he was willing to give
20 it to Scientology. They took his money even though they knew he
21 would never be able to receive any benefit from Scientology
22 auditing, even though they knew he could harm himself with the
23 materials they were selling him, particularly because they also
24 sold him E-Meters. Indeed, it is clear that Fishman was
25 overwhelmed by the Scientology materials he was given, to the
26 point of an actual psychotic break.

27 91. To understand how this could have occurred it is
28 necessary to explain briefly how Scientology processing works.

1 In essence, the theory behind auditing is that by confronting
2 painful incidents in the past one can free up mental energy that
3 has been locked up in these painful memories. L. Ron Hubbard
4 created many auditing processes which are supposed to help an
5 individual achieve greater sanity. But he made it clear that the
6 processes must be done in a precise way with no deviation. There
7 are severe penalties for anyone who deviates from the standard
8 procedures. Hubbard made it clear that it can be very harmful
9 psychologically and even physically to deviate from these
10 procedures.

11 92. Certain situations can cause a person to have trouble
12 in auditing. The most serious thing that can hinder a person's
13 progress up the "Bridge to Total Freedom" (as the exact series of
14 auditing processes is known) is becoming a Potential Trouble
15 Source, or PTS. A PTS is someone who is being suppressed in some
16 way by another person or entity.

17 93. There are different types of PTSness. Some of these are
18 listed in an October 27, 1964, policy by Hubbard known as
19 "Policies on Physical Healing, Insanity and Troublesome Sources."
20 Attached hereto as Exhibit 20 is a copy of Hubbard Communication
21 Office Policy letter entitled "Policies on Physical Healing,
22 Insanity and Troublesome Sources". Ten types of PTSness are
23 listed in this policy letter, each one of which has to do with
24 types of people who have caused Scientology "considerable
25 trouble." They include people who have sued the church, newspaper
26 reporters, family members who are hostile to Scientology, etc.
27 They are listed as Type A through Type J, thus the policy has
28 been nicknamed the "A to J policy." When someone is labelled as

1 being any of these types of PTS, he or she is barred from
2 getting any Scientology processing (auditing) or training,
3 because people who fall into these categories have historically
4 caused trouble for the organization, either by bringing legal
5 action against it or by giving negative information to the press.

6 94. Steve Fishman was labelled Type A, which is "persons
7 intimately connected with persons (such as marital or familial
8 ties) of known antagonism to mental or spiritual treatment or
9 Scientology." He was also labelled Type C, which is "persons who
10 have ever threatened to sue or embarrass or attack or who have
11 publicly attacked Scientology or been a party to an attack and
12 all their immediate families should never be accepted for
13 processing". Fishman was labelled Type C because he had paid a
14 large amount of money for a set of Hubbard's taped lectures
15 which he had never received, and he had threatened to sue CSI
16 after trying for months to get his money back. (In Scientology
17 one is never supposed to step outside of the Scientology
18 "justice system"; anyone who does so, such as by filing a police
19 complaint or a civil suit, is immediately disqualified for
20 Scientology services.)

21 95. Furthermore, because of his background of hypnosis,
22 Fishman could never be eligible for Scientology services.

23 96. Despite the fact that he was declared PTS A and C, and
24 that it was known he had an extensive history of hypnosis by a
25 psychologist, thereby barring him permanently from Scientology
26 auditing and training, Fishman was sold over \$100,000 of
27 Scientology materials, including a huge collection of tape
28 recorded lectures by Hubbard (which are not supposed to be

1 listened to until one reaches a certain level of Scientology
2 training), packs of material that are only supposed to be seen
3 by people in certain staff positions, and, what is most
4 shocking, three E-meters, one of which was specifically designed
5 for use by auditors on the confidential upper levels of auditing.
6 It is specifically designed for use in solo auditing, which is
7 auditing of oneself. It is clear from his videotaped interview
8 that this is precisely what Fishman used it for.

9 97. This created an explosive situation, one which clearly
10 could lead to a psychotic break in Fishman. Even as recently as
11 September 1993, Ray Mithoff, Senior Case Supervisor International,
12 the most senior Scientology technical expert in the world,
13 supervised the auditing of a person in England who had had a
14 psychotic break as a result of her experiences with Scientology.
15 A copy of Scientology's report on this incident is attached
16 hereto as Exhibit 21. This person had a psychiatric history, and
17 the mixing of psychiatric techniques with those of Scientology
18 had caused the psychotic episode. So it was obviously known that
19 Fishman risked a Type 3 psychotic break if he were allowed
20 training or auditing, yet he was sold thousands of dollars worth
21 of materials anyway, including an E-meter with a solo auditing
22 capacity permitting him to self audit. Thus, either
23 intentionally or out of greed and negligence, Scientology created
24 a situation in which Fishman would almost certainly suffer a
25 psychotic break and become a Type 3 PTS, as explained below.

26 98. The types of PTSness described earlier, Types A through
27 J, relate to different types of threat a person can pose to
28 Scientology. There are also three types of PTSness, known as

1 Type 1, Type 2 and Type 3, which relate to a person's own state
2 of mind and physical health. A person will manifest PTSness
3 through a range of conditions, all the way from a minor cold to a
4 more serious illness (all illness is a sign of PTSness) to
5 full-blown insanity. All PTSness is the result of being
6 connected to one or more suppressive people, suppression being
7 defined as "a harmful intention or action against which one
8 cannot fight back." A copy of a Hubbard Communications Office
9 Bulletin entitled "Search and Discovery" and describing these PTS
10 types is attached hereto as Exhibit 22.

11 99. Type 1 PTS means that the suppressive person is
12 actively suppressing the person in present time. To handle this
13 a person is interviewed by someone who helps them spot who is
14 suppressing them, whereupon the illness (a cold or whatever) is
15 supposed to vanish.

16 100. Type 2 PTS means that the person was connected to the
17 suppressive person earlier, either in this lifetime or an earlier
18 lifetime (it might have been 150 years ago, or 76 trillion years
19 ago - whatever the person thinks). Someone in present time
20 reminds the person of the actual suppressive person, and this is
21 making the person sick. Curing Type 2 PTSness requires extensive
22 auditing, usually on the PTS Rundown.

23 101. Type 3 PTS is the Scientology term for a fullblown
24 psychotic episode. It was my experience in Scientology that when
25 a person has a psychotic break they lose touch with the real
26 world and begin to hallucinate or imagine conversations, events,
27 people, and whole scenarios. Even after they recover they are

28 ///

1 never sure what part of the experience was real and what they
2 imagined.

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

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

22 104. In Fishman's case, it is unclear whether he was driven
23 to this state of mind purely through fraudulent irresponsibility
24 and negligence, or whether it was done more deliberately, as
25 described in the following Hubbard lectures.

26 105. In a number of taped lectures Hubbard said that a
27 person could be driven insane through the deliberate application
28 of what he called Black Dianetics. This is his term for a method

1 in which the normally therapeutic methods of Dianetics and
2 Scientology are reversed and the person is deliberately driven
3 mad.

4 106. In a September 17, 1951, tape called "Some Notes on
5 Black Dianetics," Hubbard stated:

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

14 A copy of the transcript of this taped lecture is attached hereto
15 as Exhibit 23.

16 107. It is possible that such techniques were used on
17 Fishman, first to induce him to break the law for Scientology and
18 then to try to get him to commit suicide, leaving a note
19 absolving the church of all responsibility. Having failed to do
20 this, church operatives could have deliberately driven him to the
21 point of a psychotic break.

22 108. Hubbard explained how to do it in the following passage
23 from "Some Notes on Black Dianetics":

24 "With Black Dianetics, you could tailor make any kind
25 of insanity you wanted to. The person might not
26 manifest this the next day, maybe not the next week or
27 maybe not for thirty days. Maybe three months later he
28 is walking down the street and feeling a little bit

1 tired when somebody honks an auto horn just right or
2 something of the sort, and all of a sudden he goes
3 crazy, and there he is - insane!"

4 109. In that same lecture Hubbard provided a blueprint for
5 getting someone incarcerated, just as Fishman was, without
6 anyone ever finding out that the person was set up:

7 "We find that nobody can protest an implanted engram
8 [meaning a hypnotic command given to a person such as
9 was portrayed in "The Manchurian Candidate"] except
10 the person into whom it has been implanted. He is the
11 only one who can protest this. He is the only one who
12 can sign out a warrant. Even if he goes insane, nobody
13 can sign out a warrant. So he could say, 'Well, it was
14 Bill and I know it was Bill and I saw Bill and Bill has
15 taunted me with it since,' and so forth, but if he has
16 been pronounced insane... he has lost his civil rights
17 and he can't issue a warrant. In other words, this is
18 legal murder, legal punishment and so forth. Because
19 the law does not know anything about this, no laws
20 exist to prevent it or inhibit it."

21 110. In another tape called "The Complete Auditor, Part I,"
22 delivered on June 28, 1951, Hubbard said:

23 "Any one of us could take a human being and, with
24 malice aforethought, drive him stark, staring crazy
25 with greater efficiency than even psychiatry does.
26 What would you do to him? You would just reverse all
27 the things that you know would help him: ... slug him
28 with some drugs, hit him in the face, take a

1 hypodermic needle to him so that you give him very
2 painful but unobservable somatics.... Then when he
3 comes out of it say this had never happened to him,
4 feed all the content back to him again by telling him
5 about other people's engrams or even his own, convince
6 him that he does not really know what his reality is
7 and convince him that you are his friend. A person
8 can't take this; he would spin. That would be an
9 efficient job, but that could be done on a person who
10 was pretty doggone sane!"

11 A copy of the transcript of this taped lecture is attached hereto
12 as Exhibit 24.

13 111. In still another tape, called "Outline of Therapy,"
14 Hubbard stated:

15 "Out of Scientology you could formulate a very fine
16 type of thought warfare. Works much better than an
17 atom bomb. An atom bomb just kills people, but you
18 could take thought warfare and you could enslave them
19 utterly. You could make complete slaves out of them."

20 A copy of the transcript of this taped lecture is attached hereto
21 as Exhibit 25.

22 112. All of these instructions just quoted are part of the
23 Scientology "scriptures." Every word Hubbard ever uttered is
24 considered to be sacred doctrine, and Hubbard's instructions are
25 taken quite literally by Scientologists. It would be entirely
26 possible for Scientology operatives to take these instructions
27 from Hubbard and use them to manipulate Fishman for their own
28 ends.

1 113. Hubbard himself ordered that "reverse processes" (or
2 Black Dianetics) be run on people he felt were particularly
3 dangerous to Scientology. In a 1968 issue he declared several
4 people fair game (meaning they could be lied to, tricked or
5 destroyed), and instructed that they be run on reverse processes
6 if they ever came into an org. Additionally, he ordered that
7 "Any Sea Org member contacting any of them is to use Auditing
8 Process R2-45." This was a reference to the use of a .45
9 semi-automatic pistol. Hubbard defined R2-45 as a very fast way
10 of getting someone exterior to their body. (See Exhibit 26.) A
11 copy of this 'declare' is attached hereto as Exhibit 27 (see item
12 7). Hubbard made it clear that he did not take suicide seriously
13 in a taped lecture called "Create and Confront," given on January
14 3, 1960, as part of the "State of Man" lecture series. See
15 Exhibit 28 for a transcript of "Create and Confront,"
16 particularly pages 93 and 94.

17 114. Even if no one deliberately set out to drive Fishman
18 psychotic, selling him materials that would completely overwhelm
19 him with incomprehensible information and then putting an E-meter
20 in his hands was nothing short of criminal negligence. There is
21 little doubt that Fishman used his E-meters to "audit" himself,
22 an action that could easily drive him into a psychotic break.

23 115. In the tape "Some Notes on Black Dianetics," Hubbard
24 himself described the dangers of self-auditing:

25 "...in Dianetics you are playing around with highly
26 explosive material. I would say that a person using
27 Dianetics in certain ways might much more happily
28 juggle two or three hand grenades with their pins

1 pulled. For instance, take some of these people who
2 run around self-auditing: why don't they just go get a
3 gun? That is much simpler and quicker."

4 116. When I was in Scientology I was assigned to keep watch
5 over a young girl in her early twenties who became Type 3 PTS
6 after being forced to sever all communication with her family,
7 because they were upset about her involvement in Scientology.
8 This incident occurred in Hemet, California, at the high-security
9 international headquarters of Scientology.

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

19 118. L. Ron Hubbard wrote a series of issues detailing what
20 to do when someone "goes Type 3." These issues comprise what is
21 called the Introspection Rundown, a rundown being a series of
22 specific actions to take to achieve a specific result in
23 Scientology processing. Hubbard felt that the Introspection
24 Rundown was a major breakthrough in the handling of psychosis,
25 and that people in mental institutions could be cured by
26 following these steps. A copy of the Introspection Rundown is
27 attached hereto as Exhibit 29.

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1 119. The first step is to isolate the person completely from
2 everyone except the people assigned to watch over the person.
3 This is called "Isolation Watch." I was assigned to watch this
4 girl, so I studied the issues to ensure I would handle her
5 correctly. We were not to say a word around her. She was to
6 have complete silence to allow her to calm down (to allow her
7 body thetans to go back to sleep, although she could not be told
8 about this, since she was not up to that level in her
9 processing). This went on for many days as she was in a serious
10 psychotic incident. None of the people assigned to watch her had
11 any formal training in dealing with psychosis.

12 120. She had no idea who she was. One moment she would think
13 she was a butterfly; the next minute she would think she was
14 Hubbard's daughter, Diana Hubbard. Then she would think she was
15 a dog, and she would bark and growl. We had to be very careful
16 to watch her so that she would not try to kill herself, and we
17 also had to be sure she did not get violent and hurt us or become
18 destructive of property.

19 121. She was never referred to any mental health
20 practitioner, because Scientologists believe that all
21 psychiatrists and psychotherapists are completely evil. Hubbard
22 preached the evils of psychiatry so thoroughly that no one in
23 Scientology would ever consider letting a mental health
24 practitioner examine anyone, even someone who is in the middle of
25 a psychotic episode. See several examples of Hubbard's writings
26 on psychiatry attached hereto as Exhibit 30. This girl was not
27 even given anything to calm her down except a mixture of calcium
28 and magnesium which was supposed to relax her and let her sleep.

1 It did not have that effect; this girl could hardly sleep at all
2 and soon became exhausted, which simply compounded the problem.

3 122. After several weeks of this, the girl finally came out
4 of the psychotic episode and was immediately sent back to her
5 family to avoid a negative public relations situation or,
6 possibly, a lawsuit.

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

18 124. Cat was taken to the home of a wealthy Scientologist
19 outside of Los Angeles. The house was surrounded with woods and
20 there were no other houses in sight. There Cat was kept under 24
21 hour watch, known as "Isolation Watch" because the person is
22 isolated from everyone except those on the "watch." Although I
23 was not assigned to watch her, I was told that Cat became
24 extremely violent on several occasions, that she tried to jump
25 through a plate glass window, that she repeatedly said she wanted
26 to kill herself, and that she had no idea who she was or what
27 she was doing. This went on for several months.

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

11 126. Maggie Butterworth, former OSA operative David
12 Butterworth's wife, was usually assigned to supervise any
13 Scientologist in Los Angeles that had a psychotic break, and I
14 believe that she was in charge of Cat Morrow, in close liaison
15 with Sandi Wilhere, a highly trained case supervisor in CSI who
16 used to be one of the most senior technical experts in
17 Scientology (Miscavige reportedly demoted her to kitchen maid
18 recently).

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

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1 unimportant department where people could keep an eye on her and
2 make sure she remained loyal to Scientology.

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

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

26 130. Finally they convinced Robert that Dorothy needed to
27 fly back to San Francisco. Upon arriving in San Francisco,
28 Dorothy was taken to a "mountain retreat," where no one else

1 would see what was taking place. Dorothy was kept there for two
2 weeks, while her husband had no idea where she was.

3 Scientologists were trying to induce Robert to buy more auditing
4 while Dorothy was held in San Francisco.

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

13 132. By the time the Gearys' attorney helped them both to
14 disentangle themselves, they had given Scientology close to
15 \$180,000. As Robert Geary described it, "This was money we
16 obviously could not afford to spend and without extreme undue
17 influence there is absolutely no way we would have ever spent
18 such sums. I have read a considerable amount about mind control
19 and now realize that my wife and I were under mind control." A
20 copy of the declaration of Robert Geary D.D.S. executed September
21 5, 1993 is attached hereto as Exhibit 31.

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

1 highly trained auditor who has dealt directly with or supervised
2 a number of "Type 3 handlings"; Greg Wilhere, whose title was
3 Inspector General in RTC in 1989 and who is a highly trained
4 auditor; Sandi Wilhere, a highly trained auditor and case
5 supervisor in CSI who at last report had been demoted to cook in
6 the communal kitchen at Hemet; and, of course, Miscavige, who
7 supervises virtually every aspect of Scientology, particularly
8 anything that might threaten the public image of the church,
9 such as Scientologists who have Type 3 psychotic breaks.

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

22 CSI's Real Motive in Filing for Dismissal Was To Protect Its
23 Managing Agents

24 135. CSI claims to be concerned about allowing several
25 Scientology celebrities to be deposed. CSI says it does not want
26 these people to be harassed by Dr. Geertz's attorneys. In truth,
27 if it served CSI's purposes to have these celebrities deposed CSI
28 would order the deponents to appear and not think twice about it.

1 This much-touted concern for the celebrities is purely show. What
2 CSI is actually worried about is that the tables have been turned
3 on it in this case. The Scientologists can dish it out, but they
4 cannot take it. They have finally met their match. Dr. Geertz's
5 attorneys Graham Berry and Gordon Calhoun have educated
6 themselves, with the help of several former Scientologists, about
7 how this organization really operates, and they are not letting
8 CSI get away with its usual harassment and intimidation tactics.
9 This is the real reason CSI filed for dismissal.

10 136. Dr. Geertz's attorneys have parted the flimsy curtain
11 of a corporate veil honored almost always in breach to reveal the
12 true structure of authority in Scientology, the Sea Organization,
13 and the people who really run Scientology, starting with
14 Miscavige, the managing agent of the entire organization, and his
15 key lieutenants, including Norman Starkey, Greg Wilhere, Mark
16 Yager, Marty Rathbun and Ray Mithoff. Under Miscavige's
17 direction, this organization has systematically violated the
18 civil and human rights of its members, secure in the knowledge
19 that because it calls Scientology a religion, it is protected by
20 the First Amendment. Suddenly CSI is confronted by counsel
21 assisted by experts who are fully aware that the Tech is applied
22 both secularly and ecclesiastically. The veil provided by the
23 misuse of First Amendment claims that every action by a
24 Scientologist is religious and beyond scrutiny by the civil
25 justice system has been parted. CSI's management has been
26 delivered a clear and compelling message. CSI's management knew
27 it could not maintain its facade of respectability and

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1 religiosity if CSI allowed this case to continue. That is why CSI
2 moved to dismiss it on the eve of trial.

3 137. Miscavige has filed a declaration in which he denies
4 being the managing agent of the Scientology empire. He words his
5 denial carefully, using the language of the corporate shell he
6 created to shield his true position from the Courts. But the
7 truth is that he does run it, either directly or via his key
8 lieutenants. This is common knowledge within the upper echelons
9 of the Sea Organization. Miscavige's position of power (and the
10 power of his lieutenants) in Scientology is what was being
11 protected by the filing of CSI's motion to dismiss. Therefore,
12 the truth about Miscavige and the henchmen who carry out his
13 orders bears telling.

14 Miscavige is the Managing Agent of Plaintiff CSI

15 138. As stated earlier, I was a Scientologist for nearly 15
16 years, from January 1975 until July 1989. I was in the GO and its
17 successor (a name change only), OSA, for most of that time. I
18 also worked in another part of Scientology called Author
19 Services, Inc. ("ASI"). I was a Sea Organization ("Sea Org")
20 member during my tenure on all of these posts.

21 139. All of the positions I held from 1978 until 1989
22 enabled me to observe firsthand the line of command and the
23 organizational structure of Scientology. There is no question
24 whatsoever that Miscavige now holds the same position of absolute
25 power over Scientology, cutting across all corporate boundaries,
26 that Hubbard had before he died. Just as Hubbard was the managing
27 agent for the original mother church, CSC, Miscavige is the
28 managing agent for the current mother church, CSI, via his

1 position as Chairman of the Board of the Religious Technology
2 Center ("COB RTC").

3 140. I first became aware of Miscavige in 1981, when a coup
4 took place within Scientology. Until then there had been two arms
5 of Scientology. The Guardian's Office was run by Mary Sue Hubbard
6 and took care of everything external to the organization, such as
7 public relations, government relations, litigation, and anything
8 else that might hinder the expansion of Scientology. The other
9 branch, the Commodore's Messenger Organization ("CMO"), ran
10 Scientology itself under the direct command of Hubbard (known as
11 the Commodore). Reality was directly contrary to Hubbard's
12 repeated claims that he had resigned all management
13 responsibility in 1966. The CMO directed all internal operations
14 via an unincorporated group of highly dedicated Scientologists
15 known as the Sea Org.

16 141. In 1981, I was a senior executive in the United States
17 Guardian Office ("USGO"). One evening we were informed that the
18 GO was being taken over by the CMO. From that time on Miscavige
19 has had complete control over all branches of Scientology.

20 Miscavige Wields His Power Through a Small Circle of
21 Lieutenants

22 142. Miscavige wields his power through a small circle of
23 trusted Sea Org lieutenants who obey him unquestioningly. Until
24 July 1989 when I left, his most senior aides were in RTC and
25 included Greg Wilhere, who was the Inspector General ("IG");
26 Marty Rathbun, who was the Inspector General for Ethics ("IG
27 Ethics"); Ray Mithoff, who was the Inspector General for
28 Technology ("IG Tech"); and Marc Yager, who was the Inspector

1 General for Administration ("IG Admin"). Another top aide was
2 Norman Starkey, who was corporately the trustee of Hubbard's
3 estate.

4 143. Based on testimony generated in this and other
5 cases with which I am familiar in my capacity as a consultant and
6 expert and conversations with high-ranking Scientologists who
7 have left since I left in 1989, Miscavige has reorganized his
8 command structure and done away with the IG Ethics, Tech and
9 Admin posts. Miscavige has moved Ray Mithoff back to his old
10 position of Senior Case Supervisor International ("Senior C/S
11 Int") in CSI. He has moved Marc Yager back to his old position as
12 Commanding Officer of the Commodore's Messenger Organization
13 International ("CO CMO Int") in CSI. From the most recent decla-
14 rations of Marty Rathbun and Greg Wilhere, it appears that
15 Miscavige has removed both of them from their posts. They are now
16 on the ship, the *Freewinds*, probably on the Rehabilitation
17 Project Force ("RPF"), which is the Scientology version of a
18 prison camp. For some reason Miscavige wanted both of them out of
19 the country as this case approached trial. This is probably
20 because both Wilhere and Rathbun have committed acts which may be
21 violations of criminal and civil law on Miscavige's orders. Many
22 of the people designated to be trial witnesses by Dr. Geertz's
23 counsel were witnesses to these unlawful transgressions. If
24 Miscavige's lieutenants were to testify, they would have faced
25 exposure to perjury charges. They are also aware of many wrongful
26 acts which run afoul of criminal and civil law of which Miscavige
27 is directly guilty. There is a possibility that Miscavige's
28 lieutenants, when faced with the prospect of personal criminal

1 liability for perjury for false testimony designed to protect
2 Miscavige, would instead abandon their mentor when placed under
3 oath and reveal what they know, particularly if granted immunity.

4 144. Miscavige has other top aides in CSI whom he orders
5 either directly or via the RTC command lines. These CSI aides
6 include the Watchdog Committee ("WDC"), which is a group of Sea
7 Org members who manage all of the different branches of
8 Scientology, both secular and non-secular. Other top CSI aides
9 include Kurt Weiland, who is the Commanding Officer of the Office
10 of Special Affairs International ("CO OSA Int"); Guillaume
11 Lesevre, who is the Executive Director International ("ED Int");
12 and Heber Jentsch, who is a PR front man with the title of
13 President of the Church of Scientology International ("President
14 CSI"). In reality, Heber has no administrative power at all and
15 his duties are solely to deal with media and other PR groups.

16 145. The authority of the above-named individuals comes
17 solely from Miscavige. Any one of them can vanish overnight. Any
18 one or all of them can be sent to the prison camp known as the
19 RPF if Miscavige even suspects disloyalty. (This is undoubtedly
20 what happened to Wilhere and Rathbun.) Miscavige's authority
21 over RTC, CSI and (via these two corporations) the rest of
22 Scientology, is absolute.

23 146. Since Miscavige took over the Guardian's Office in
24 1981, he has had virtually total control over the entire
25 Scientology organization, including all branches of Scientology
26 management and extending out to every single person in the world
27 who is a Scientologist. No one can challenge his authority.
28 Miscavige can expel anyone from Scientology literally with a snap

1 of his finger. In fact, "The Sea Organization Expansion News"
2 contains a graphic picture of Miscavige "declaring a former
3 Mission Holder suppressive." (See Exhibit 32.)

4 147. Miscavige derived his power directly from Hubbard,
5 which is why his power was and now is so absolute. Hubbard went
6 into hiding in 1976 to avoid the IRS. Several government agencies
7 around the world and in the U.S. and a number of former
8 Scientologists sued Hubbard. Miscavige gradually took over as
9 Hubbard's eyes and ears until finally, by 1981, Hubbard allowed
10 him to take over entirely.

11 Miscavige First Ran Scientology from Author Services, Inc.

12 148. In 1981 Miscavige called himself Special Project
13 Operations ("Special Project Ops"). He set up offices in the CMO
14 building across the street from the big blue building in Holly-
15 wood. From this position, he ran the entire Scientology
16 operation. He had several people working directly with him in a
17 unit called Special Project, including Norman Starkey, Terri
18 Gamboa, Lyman Spurlock, my husband Robert Vaughn Young, myself,
19 and others. These people ran all the PR, Legal and Intelligence
20 functions that had previously been run by the Guardian's Office
21 line of command. The primary focus was the Mission All Clear, or
22 the MAC Unit, in the Legal Division of the Guardian Office. The
23 purpose of this unit was to extricate Hubbard from all the
24 lawsuits that had been filed naming him as head of the church.
25 Miscavige was personally charged with extricating Hubbard from
26 pending litigation so Hubbard could come out of hiding.

27 149. Because Miscavige had the direct communication line to
28 Hubbard, he also had authority over all of the internal

1 Scientology management personnel. All communications from Hubbard
2 came through Miscavige, and all communications to Hubbard went
3 through Miscavige. There were only two other people more senior
4 than Miscavige, Pat and Annie Broeker. Their status arose
5 because they were actually with Hubbard. An order from Pat or
6 Annie had as much authority as an order from Hubbard because they
7 were so close to him.

8 150. But Pat and Annie were sequestered off at the Creston,
9 California, ranch. Miscavige was at the center of and actually
10 directing Scientology activities. He used his position of high
11 visibility within the Scientology command structure to run
12 Scientology from the moment he became Special Project Ops.

13 151. In May 1982, Miscavige and the rest of the staff of
14 Special Project moved to a suite of offices on Sunset Boulevard
15 and adopted the corporate mantle of ASI.

16 152. Miscavige appointed himself COB of ASI. This title was
17 for consumption by the general public. Miscavige continued to
18 identify himself as Special Project Ops in correspondence with
19 church personnel. Miscavige appointed Terri Gamboa Executive
20 Director of ASI. He gave Norman Starkey the title Legal Affairs
21 Director. Lyman Spurlock became Corporate Affairs Director.
22 Miscavige gave Robert Vaughn Young the title Public Affairs
23 Director, and so on. Miscavige assigned me the job of Organizing
24 Officer of ASI. As such, I was responsible for making sure the
25 staff were doing their jobs properly. If the staff failed in any
26 way, I was charged with correcting them.

27 153. During this time, and from 1981 until Hubbard died in
28 1986, I observed firsthand Miscavige systematically replacing

1 Hubbard as head of Scientology. Publicly, ASI was promoted as a
2 glitzy Hollywood literary agency dealing exclusively with the
3 works of Hubbard. But behind the scenes, Miscavige was running
4 all of Scientology from the ASI offices.

5 154. As an ASI staff member, I was instructed, and all those
6 who worked in ASI were also instructed, that making large amounts
7 of money for Hubbard was an integral part of running Scientology.
8 Hubbard's written communications to ASI staff revealed that he
9 felt nothing but contempt for his reation, the church of
10 Scientology. He made it clear that he felt perfectly justified
11 in taking as much money out of the church as DM and the other ASI
12 staff could get away with. (Hubbard dictated all of his
13 communications and the dictation was then transcribed and
14 distributed by Miscavige. Both the dictation tapes and the
15 dispatches still exist, although CSI will undoubtedly deny it.)
16 Hubbard made it very clear that Miscavige's success or failure
17 would be based on how much money he could make for Hubbard,
18 whether it came from church coffers or other sources.

19 155. Accordingly, Miscavige made sure that as much money as
20 possible was taken from church accounts. Fran Harris thought up
21 labels, known in Scientology as "significances," which were
22 attached to huge lump sums which Miscavige then ordered to be
23 transferred from nonprofit church accounts into ASI accounts
24 every week. These labels were designed to conceal from the IRS
25 and other governmental agencies the true nature of the transfers.

26 156. There was never any question that the staff at the non-
27 profit organizations would transfer the money as directed. Each
28 of these organizations and therefore each of the staff members

1 was junior to Miscavige. If Miscavige ordered it done, it had to
2 be done. If anyone having responsibility over the financial
3 accounts of the junior organizations refused to follow orders
4 from Miscavige he or she was subject to immediate banishment to
5 the RPF. I was told by my superiors, including Miscavige, that
6 Miscavige was acting as Hubbard's deputy, and that anything
7 Miscavige ordered should be treated as an order directly from
8 Hubbard himself.

9 157. The only thing that ever slowed these transactions down
10 was making sure the significance attached to the transfer would
11 appear legitimate to the IRS. Miscavige made Lyman Spurlock
12 responsible for working out the legal details of these transfers.
13 I often had to sit down with Lyman and help him calm down after
14 he had been ordered to legitimize some of Fran Harris's
15 money-making ideas. Lyman told me that he had had many serious
16 disagreements with Fran about the legality of at least some of
17 her schemes. In my experience, when Lyman expressed his doubts to
18 Miscavige, Miscavige always sided with Fran. Miscavige's
19 instructions usually concluded with an order to Lyman to "make it
20 legal."

21 158. Miscavige also assigned Lyman the task of sorting out
22 all of the Scientology corporations so they would be legally
23 defensible in the eyes of the IRS and other governmental
24 agencies. It was at this point that the huge conglomeration known
25 as Church of Scientology of California ("CSC"), the predecessor
26 "mother church," was split up into many different corporations.
27 Lyman worked out the whole shell, including all the relationships
28 between the different echelons.

1 159. Lyman arranged for the Religious Technology Center
2 ("RTC") to have contracts with every single corporation that uses
3 Hubbard and Scientology trademarks and copyrights in any way,
4 including the management organizations, the service
5 organizations, the businesses that use Hubbard's books, and so
6 on. The real purpose of all of these contracts was to have a
7 legal means by which to collect monies from these entities, and
8 to put anyone out of business who refused to tow the line of
9 Scientology orthodoxy as dictated by Hubbard or any of his
10 successors.

11 160. Since Hubbard's death, Miscavige has assumed the power
12 and authority to put out of business any Scientologist who
13 refuses to tow the orthodox Scientology line as he dictates it.

14 161. I worked directly with Miscavige while I was at ASI. I
15 was horrified to discover that the senior-most person in
16 Scientology, who had daily contact with Scientologists and the
17 public, was a ruthless, vicious, megalomaniacal tyrant. I had
18 never worked with Hubbard personally, but I learned from others
19 who had that Hubbard was the same way. I was told that Hubbard
20 was prone to the same petulant temper tantrums that were daily
21 occurrences with Miscavige.

22 162. Miscavige's style of management was exemplified by
23 screaming profanities and terrorizing the staff. This is entirely
24 consistent with the Hubbard Tech which features "Ethics
25 Presence." Senior managers are taught to manage by instilling
26 fear and terror in their subordinates. As the most senior
27 manager, Miscavige had to instill terror in all his subordinates
28

1 in order to be in compliance with orthodox Scientology management
2 techniques.

3 163. One day Miscavige gave me an insight into why he acted
4 the way he did. He knew I did not approve of his cursing at the
5 top of his lungs. We were having an executive meeting, and in the
6 middle of a sentence he suddenly turned to me, very seriously,
7 and said, "You think I yell loudly, but you've never heard anyone
8 yell until you've heard LRH [Hubbard]. I'll never be able to
9 scream the way he does. But Stacy, that's the only way to get
10 compliance." This was confirmation that he was acting
11 deliberately and calculatingly in accordance with the dictates of
12 the Hubbard Tech.

13 164. I realized then that Miscavige was trying to become as
14 much like Hubbard as he could, and that he was preparing to take
15 Hubbard's place when Hubbard died.

16 165. Anyone who disagreed with Miscavige or challenged his
17 authority in any way was branded by Miscavige as a traitor who
18 was out to destroy Scientology. This was why David Mayo was
19 ousted, along with most of his staff. Many others were thrown out
20 in 1981 and 1982 and replaced with people who would obey
21 Miscavige's orders unquestioningly. Ray Mithoff, who replaced
22 Mayo, is today one of Miscavige's top lieutenants. John Nelson,
23 head of the CMO and director of all the Scientology
24 organizations, was also ousted by Miscavige and replaced by a
25 loyal follower, Marc Yager. Today Yager is another one of
26 Miscavige's top people.

27 166. Hubbard was still alive when I was at ASI in 1982, and
28 every staff member in ASI was required to report to Hubbard every

1 week on the status of his or her sector of Scientology. No one
2 slept from Tuesday to Friday because Miscavige ordered that no
3 one could leave until he had approved their weekly report to
4 Hubbard. Miscavige repeatedly rejected the reports, insisting
5 that they be rewritten until they were perfectly worded to appear
6 that Miscavige had everything fully under control. No one was
7 allowed to send any communication to Hubbard that wasn't edited
8 by Miscavige (which meant that Hubbard effectively did not really
9 know what was going on from 1981 until his death). This grueling
10 schedule left the entire staff in terrible shape physically, and
11 extremely vulnerable to Miscavige's brutal, coercive
12 manipulation.

13 167. At that time the ASI offices were on the ninth floor of
14 an office building in downtown Hollywood, yet people could hear
15 Miscavige screaming down on the street, a block away. It was
16 disgusting to see how he treated anyone he viewed as not fully
17 "with him."

18 Miscavige's Treatment of his Staff Was Horrifying

19 168. Jim Isaacson, for example, was in charge of investing
20 Hubbard's money, and he was expected to show a profit on a weekly
21 basis. Anyone familiar with the investment business knows this is
22 not a realistic expectation, but Jim's job depended upon his
23 showing an increasing profit every week. Predictably, Jim was not
24 doing well at all. He was not eating or sleeping. Miscavige was
25 screaming mercilessly at Jim every day. Jim was near the
26 breaking point.

27 169. One day Miscavige found out that Jim had lost a large
28 amount of money by investing incorrectly in the gold market.

1 Miscavige summoned two of his top lieutenants, Norman Starkey and
2 Terri Gamboa. Miscavige and Starkey literally dragged Jim into
3 the conference room.

4 170. My office was right across the hall so I heard
5 everything that went on. For the next three and a half hours
6 Miscavige screamed profanities and wild, paranoid accusations at
7 Jim, demanding to know who had sent him to destroy Scientology,
8 was he working for the IRS, was he working for the FBI, what
9 other enemy agents were working with him inside Scientology,
10 etc., etc., ad nauseam. I heard Jim repeatedly deny the
11 accusations, and Miscavige's response was to scream at him even
12 more.

13 171. Finally Miscavige threw open the door and stormed into
14 my office. He ordered me to go in and get the information out of
15 Jim and not let him leave until he'd confessed everything. I'd
16 never seen anyone behave like Miscavige before. (As stated above,
17 while I was on this post and later while I was in the RPF, I
18 learned from others that Miscavige's behavior mimicked
19 Hubbard's.)

20 172. Miscavige was very frightening. When he was worked up
21 his conduct was consistent with what I later learned was a
22 psychotic episode. Miscavige appeared to be completely out of
23 control. He screamed profanities at the top of his lungs directly
24 in my face. Others who went past my office kept their eyes
25 averted and walked by as quickly as possible. Finally, he marched
26 down the hall (with Norman and Terri following) and slammed the
27 door of his office.

28

1 173. When I went into the conference room I found Jim
2 collapsed on the table. His eyes were glazed and he was shaking
3 uncontrollably. Rather than complying with Miscavige's order to
4 continue the interrogation, I did my best to calm Jim down, as he
5 was clearly terrified, and told him to go home and get some
6 sleep. Jim was on the RPF within days.

7 174. Part of Jim's terror arose from the fact that Miscavige
8 had already sent Jim's wife, Joyce, to the RPF for refusing to go
9 along with his brutal treatment of staff. I knew about this
10 because I replaced Joyce. I was dispatched to the RPF shortly
11 thereafter because I objected to the same abuses.

12 175. No one could speak out against Miscavige's terror
13 tactics because there was no way to have a discussion with him on
14 the subject. The RPF filled up with people who tried to stand up
15 to him. He surrounded himself with people who were willing to do
16 whatever he ordered. I tried several times to protest and ended
17 up in more and more trouble as the weeks went on. Finally
18 Miscavige lost his temper at me one night and threw me into my
19 office, locked the door, and screamed at me until finally I felt
20 I would lose my mind if he did not stop. I had not slept for
21 several days, and I snapped.

22 Staff Who Were Critical of Miscavige Were Sent to the RPF

23 176. The next day I didn't go to work, saying I was sick. I
24 was afraid to tell anyone what had happened for fear that
25 Miscavige would separate me from my husband (another common
26 tactic he uses, as did Hubbard, to control people). Unfortunately
27 I confided in someone I thought I could trust that Miscavige was
28 a brutal, tyrannical bully. That person immediately reported me

1 to Miscavige. That night at four in the morning there was a loud
2 knock on my door. It was the Scientology security police. They
3 took me to the RPF. That is how absolute Miscavige's power is,
4 and how immediate is the punishment for anyone who doesn't
5 completely submit to his authority.

6 177. Miscavige charged me with being an agent who had been
7 sent in to destroy Scientology. He claimed that I was working for
8 Michael Flynn, an attorney who was successfully litigating
9 against Scientology at that time. He ordered me to submit to what
10 was known as a "gang-bang sec check." Two very large, strong men,
11 Andre Tabayoyon and Rick Aznaran, locked me in a room and
12 interrogated me for hours. During the interrogation, they
13 screamed and swore at me. They accused me of all sorts of crimes
14 against Scientology. They demanded that I confess to being an
15 enemy agent.

16 178. Miscavige had also ordered me to do the "Running
17 Program" as part of the requirements for getting off the RPF.
18 This consisted of running around an orange pole for 12 hours a
19 day. I was supposed to do this until I had some sort of
20 realization about what was wrong with me, whereupon, presumably,
21 I would stop being critical of him.

22 179. After one of the gang-bang sec check sessions, I was
23 extremely upset. I was not paying sufficiently careful attention
24 to where I was placing my feet as I ran around the orange pole. I
25 ran straight-legged into a pothole about a foot deep and smashed
26 one of my sacroiliac disks. This put me flat on my back. I was
27 unable to walk. I was under orders from a doctor not to move
28 because he thought there was a danger that I might suffer

1 paralysis from movement before the swelling in the disk subsided.
2 I paid for the doctor myself, since Miscavige had ordered that no
3 one give me any assistance whatsoever and, indeed, I was not paid
4 at all for several months on the RPF.

5 180. Despite my medical condition, diagnosed by a
6 Scientologist doctor, Miscavige issued orders that I be sent to
7 Florida to get me as far away from my husband as possible.
8 Miscavige said he was afraid I would turn my husband against him.
9 A Commodore's Messenger burst into my room one evening and
10 ordered me to pack immediately so that I could catch a flight to
11 Clearwater that night. I was to be transferred to the RPF at the
12 Flag Land Base, another Scientology compound. I protested, she
13 continued to insist that I get up until I was finally able to get
14 her on the phone with the doctor, who told her the church would
15 be responsible if I ended up paralyzed.

16 181. Although Miscavige allowed me to remain in Los Angeles,
17 I was imprisoned, under guard, on the seventh floor of the
18 building, so that I could not escape and reach my husband. We
19 were not allowed to see each other at all for three months, and
20 even our letters to each other were intercepted. Neither of us
21 knew what had happened to the other and it was agonizing for both
22 of us. I was under threat of expulsion and I believed that if I
23 were expelled I would never see my husband again. I was deathly
24 afraid that Miscavige would lie to my husband about me and turn
25 him against me. I finally convinced Miscavige that I was not a
26 threat to him, and my husband and I were allowed to see each
27 other again.

28

1 Miscavige Rules Via the Sea Organization; There is No
2 Corporate Integrity

3 182. Horror stories like this could be told by any
4 Scientology staff member who has worked in close proximity with
5 Miscavige. The only people who will talk about him, however, are
6 those who have left, because as long as they are inside he
7 virtually holds the power of life and death over them. He can
8 separate them from the spouses, separate them from their
9 children, keep them from sleeping, keep them from eating anything
10 but rice and beans, imprison them for years in the prison camps
11 known as the RPF. Miscavige's power is absolute, and it has
12 nothing to do with corporate boundaries. As did Hubbard before
13 him, he wields his power via the Sea Organization, which is an
14 unincorporated, fiercely dedicated, group of Scientologists. It
15 is the Sea Org that actually runs all of Scientology.

16 183. Miscavige simply uses the corporations, as Hubbard did,
17 to manipulate the courts, the IRS and other government agencies.
18 The corporations were only created to fool the outside world, the
19 "wog world," as Sea Org members contemptuously call it. Inside
20 Scientology, the only boundaries are the ones Miscavige chooses
21 to create, just as it was with Hubbard before him, and everyone
22 knows it. In fact, now that Hubbard is dead, what Miscavige wants
23 is senior even to what Hubbard policy says. Miscavige can violate
24 policy and break the law whenever he wants to and no one can stop
25 him.

26 The 1982 Mission Holders' Meeting Illustrates the Emptiness
27 of the Corporate Shell

1 184. Miscavige and his RTC and CSI lieutenants can walk into
2 any Scientology organization and order anything they want or shut
3 it down at whim. Nowhere has there been a clearer illustration of
4 the emptiness of Scientology's corporate shell than the infamous
5 Mission Holders' meeting in 1982. A transcript of this meeting is
6 attached as Exhibit 33. Although Miscavige's profanity and many
7 of his and his lieutenants' less elegantly phrased comments have
8 been edited out, several things are still clear.

9 185. Miscavige, who at the time was officially COB ASI, was
10 head of Scientology and senior to everyone else there. The other
11 speakers included Lyman Spurlock, Corporate Affairs Director at
12 ASI; Norman Starkey, Legal Affairs Director at ASI; Ray Mithoff,
13 Senior Case Supervisor International in CSI; Marc Yager, CO CMO
14 Int in CSI; Guillaume Lesevre, ED International in CSI; Steve
15 Marlowe, then Inspector General of the Religious Technology
16 Center (he was later sent to the RPF and replaced by Vicki
17 Aznaran, who in turn was busted and replaced by Greg Wilhere, who
18 has since been busted and, apparently, replaced by Miscavige
19 himself, holding the position of Inspector General as well as
20 that of COB RTC); and Wendell Reynolds, International Finance
21 Dictator in CSI (he was later busted and spent several years on
22 the RPF).

23 186. Miscavige, an employee and director of ASI, and his
24 lieutenants, whose employment spanned RTC, ASI and CSI, were
25 speaking directly to a group of people who held the franchise
26 rights to various missions (missions being the lowest
27 organizations on the Scientology totem pole). Yet there was no
28 concern for corporate integrity that day in San Francisco. These

1 Scientology leaders, on Miscavige's orders, expelled several
2 mission holders on the spot that day for being unhappy about what
3 they were hearing, destroying their business with a snap of the
4 finger. On Miscavige's orders the mission holders were ordered to
5 pay large sums of money for a promotional campaign for the
6 original Dianetics book, under threat of being investigated for
7 crimes against Scientology if they refused. They were ordered to
8 pay large sums of money for many other "crimes," real or
9 imagined, under threat of losing their business if they refused.
10 The result was hundreds of thousands of dollars paid into CSI and
11 RTC accounts from these missions.

12 187. Hundreds of people, including many mission holders,
13 were expelled from the church during that time. All people who
14 criticized Miscavige or refused to comply with his orders, re-
15 gardless of status or organizational affiliation, were subject to
16 expulsion. Miscavige quickly made it clear that he could order
17 any Scientologist, anywhere in the world, to do anything he
18 wanted. See Exhibit 32 for a copy of "The Sea Organization
19 Expansion News," "The Sea Org Moves In!" copyrighted by CSI,
20 which includes a photograph of Miscavige expelling a Mission
21 Holder. There is also another photograph which shows Marc Yager,
22 Miscavige, Norman Starkey, Guillaume Leserve and Ray Mithoff,
23 among others, all identified by their Sea Org ranks even though
24 Miscavige and Starkey were ASI (non-church) staff at the time.
25 This is further evidence that these men are managing agents of
26 CSI, which was why Dr. Geertz wanted them deposed in this case.

27 Miscavige Personally Ordered and Oversaw the Portland

28 Crusade

1 188. I was in the Office of Special Affairs United States
2 (OSA US) in Los Angeles in 1985 when a jury awarded Julie
3 Christofferson \$39 million in damages for being harmed by
4 Scientology. We had all expected to win the case. After all,
5 Miscavige and his top aides had been up in Portland running the
6 whole thing directly. How could we lose? There was champagne and
7 a huge, sumptuous buffet waiting for us, as soon as we received
8 word on the victory.

9 189. Instead, we got word that there was a \$39 million
10 decision against the church. It was devastating. Dead silence
11 fell throughout OSA US's offices. For an hour, no one knew what
12 to do. It was the most humiliating defeat Scientology had ever
13 had.

14 190. And then suddenly all the OSA staff were summoned into
15 one of the legal offices. Miscavige and Norman Starkey, who was
16 Legal Affairs Director, ASI, at that time, were on the speaker
17 phone. The decision was an outrage, Miscavige told us. He told us
18 he would not permit it to stand. Every Scientologist from around
19 the world was ordered to Portland, immediately. We were to spread
20 the word by whatever means possible, arrange transportation,
21 raise the money, do whatever we had to do to get the
22 Scientologists there. This was the beginning of what became known
23 as the Portland Crusade.

24 191. The staff of OSA did nothing but run various aspects of
25 the Portland Crusade until the judge finally declared a mistrial
26 several months later. The entire operation was overseen by
27 Miscavige and his top staff. Planes were chartered to fly
28 Scientologists from Europe to Portland; donations were raised to

1 print a special edition of the church publication, FREEDOM, about
2 the "Religious Freedom Crusade" and distribute it door to door to
3 every home in Portland. Miscavige even ordered students to leave
4 their Scientology courses (unheard of in Scientology) to go to
5 Portland.

6 192. The best time to observe how the Scientology command
7 lines really work is during a disaster. The Christofferson loss
8 of 1985 was the biggest disaster Miscavige had ever had to deal
9 with, and all semblance of corporate integrity fell by the
10 wayside in an instant.

11 Miscavige Crossed All Corporations When Hubbard Died

12 193. The corporate structure was completely ignored again
13 when Hubbard died in January 1986. I was ordered to ASI and
14 briefed, along with a roomful of others from OSA US (Church of
15 Scientology Western United States, or "CSWUS"), OSA Int (CSI),
16 CMO International (CSI), Gold (CSI) and elsewhere, by Miscavige
17 on what had happened. Then, although he had no corporate
18 authority over any of these organizations or staff, he went
19 around the room and gave each of us our instructions as to what
20 we must do in the transition to the post-Hubbard era of
21 Scientology.

22 194. When Hubbard died, I was employed by an organization
23 called North Star. This was a non-church corporation I formed to
24 put FREEDOM Magazine, which I edited, at arm's length from the
25 various Churches of Scientology for tax purposes. I created a
26 separate corporation based on the advice of Scientology's lead
27 tax attorney, Chris Cobb, Esq.

1 195. Although North Star was established as a subsidiary
2 corporation of CSI, in reality North Star was supposed to receive
3 its operating instructions from OSA US (CSWUS). We did receive
4 instructions from executives at OSA, but we also received
5 instructions directly from ASI, including Miscavige himself. He
6 assigned us to do a research project for the Hubbard biography.
7 At the time, we were receiving direct orders from both OSA and
8 ASI.

9 196. Miscavige ordered me to write the copy for a eulogy of
10 Hubbard. I worked directly with Norman Starkey and Miscavige to
11 finalize the copy, and Miscavige gave the final approval. Then,
12 under orders from Miscavige, I worked with Jonathan Epstein, a
13 financial banking officer who was part of CSI, to arrange for
14 several hundred thousand dollars to be pulled from various
15 reserve accounts in a number of different corporations. These
16 funds paid for the eulogy to be placed in major newspapers around
17 the country as full-page ads.

18 197. After the ads were placed, Miscavige then ordered me to
19 create a booklet about Hubbard to be used for promotional
20 purposes. Again he ordered Jono Epstein (CSI) to pull funds from
21 various church corporations to pay for a massive distribution of
22 the booklet. Copies of the booklet were inserted in several major
23 newspapers in major cities. Thousands of copies were mailed out.
24 The cost for this project came to approximately \$2 million and
25 was funded by reserve accounts from several church corporations,
26 as ordered by Miscavige.

27 Today Miscavige Has Completely Consolidated His Power

1 198. With Hubbard dead Miscavige moved quickly to
2 consolidate his power. In early 1987 he removed his only
3 remaining challengers, Pat and Annie Broeker. He also switched
4 his base of operations from ASI to RTC. It was a bloody coup.
5 Miscavige applied the scorched-earth policy to all who had ever
6 had a kind word for the Broekers. My husband, who had worked with
7 Pat Broeker, was sent to the RPF along with Vicki Aznaran, Greg
8 Ryerson, Jesse Prince, Spike Bush, and many others. Only those
9 who had remained steadfastly loyal to Miscavige were allowed to
10 keep their jobs.

11 199. Today, the only people who survive are those who kowtow
12 to Miscavige unreservedly and completely. He has truly become
13 Hubbard's successor. He curses like him, screams like him, thinks
14 like him, and rules with a ruthless, iron hand and a contempt for
15 the outside world just the way Hubbard did when he was alive.

16 200. Just as Hubbard did, Miscavige has created many
17 corporate layers between him and the courts, the IRS, other
18 governmental agencies and the outside world in general, and he
19 deals them like so many cards when it is convenient. But it is
20 Miscavige who really holds the power, and because he is COB RTC,
21 RTC is the only Scientology entity with any real power.

22 201. See Exhibit 34 for RTC Executive Directive No. 450,
23 dated 6 September 1991, from Miscavige to all Scientologists.
24 The first 22 pages of this document provide a valuable glimpse of
25 the world according to Miscavige, bizarre paranoia and all.

26 202. On page 22, Miscavige announces a general amnesty for
27 all Scientologists, meaning that anyone who has gotten into
28 trouble in the past is forgiven and can get back on the "Bridge

1 to Total Freedom." This amnesty cuts across all corporate
2 boundaries. The document behind it, Inspector General Network
3 Bulletin No. 14, is from one of Miscavige's lieutenants, former
4 Inspector General for Ethics RTC Marty Rathbun. This document
5 explains to all Scientologists how to apply the amnesty. It also
6 cuts across all corporate boundaries.

7 203. CSI is only a lackey corporation. The function of the
8 staff members of CSI is to carry out Miscavige's orders. If a CSI
9 staff member refuses to comply with Miscavige's orders he or she
10 is removed from post and sent to the RPF. CSI has no more
11 independent authority than any other church or non-church
12 corporation in the Scientology network. Its authority (indeed,
13 its existence) is solely in the hands of Miscavige. If he decided
14 to rearrange the corporate structure again he could do away with
15 CSI altogether and create an entirely new corporation in its
16 place. This is the extent of his power over the Scientology
17 network, including CSI and RTC.

18 204. There is no one else who can represent Scientology.
19 Everyone else is only speaking in Miscavige's place. He is
20 telling them what to say and what not to say, and if they make a
21 mistake, they will feel his wrath. If they make a big mistake,
22 they will go to the RPF. If they ever told the courts what they
23 really know, Miscavige would have them expelled from Scientology
24 and labelled Fair Game, like many others before them.

25 205. In short, the only person who is in a position to talk
26 about all of the inner workings of the Church of Scientology is
27 Miscavige, because he is the only person who will not be punished
28 for doing so. There is no one above him to punish him. He alone

1 can tell the whole truth. His lieutenants know the truth but can
2 tell what they know only if Miscavige gives them permission to do
3 so.

4 Miscavige's Key Lieutenants Are Also Managing Agents of CSI

5 206. As COB RTC Miscavige controls Scientology via several
6 key lieutenants who have absolute authority to carry out his
7 orders. Although their official positions may have changed
8 corporately as described above, they still wield the same degree
9 of power. If any of these people have been removed from their
10 positions recently, they can still testify about the power they
11 had before they were removed, and furthermore, they can testify
12 that it was on Miscavige's authority that they were removed.

13 These lieutenants include Greg Wilhere, who held the position of
14 Inspector General RTC; Marty Rathbun, who held the position of
15 Inspector General for Ethics RTC; Ray Mithoff, who held the
16 position of Inspector General for Technology RTC and has
17 apparently since been moved to Senior Case Supervisor
18 International in CSI; and Marc Yager, who held the position of
19 Inspector General for Administration and has apparently since
20 been moved to Commanding Officer Commodore's Messenger
21 Organization International in CSI. Another top aide is Norman
22 Starkey, who is the trustee of Hubbard's estate and the Executive
23 Director of ASI. He is also a troubleshooter for Miscavige.
24 Norman must be obeyed when he is operating under Miscavige's
25 orders.

26 Ray Mithoff is a Managing Agent of CSI

27 207. Senior C/S Int Ray Mithoff is a managing agent of CSI.
28 He has command lines via CSI to all churches, missions and any

1 other organizations that deal with the auditing and study
2 technology of Scientology. His primary contact points are the
3 Senior Case Supervisors in the various organizations. In CSI
4 these are in CMO Int, Gold and OSA Int. All directives concerning
5 the technology must be authorized by Senior C/S Int, who in turn
6 must get approval from Miscavige.

7 **Marc Yager is a Managing Agent of CSI**

8 208. CO CMO Int Marc Yager is a managing agent of CSI. He is
9 responsible for managing all of Scientology administratively and
10 has command lines via CSI to all churches, missions and other
11 Scientology organizations, including OSA via WDC OSA (Mike
12 Rinder). His primary contact points are the executive directors
13 of each organization, called commanding officers in the upper
14 management Sea Org units. In CSI he orders via WDC and ED Int.
15 All directives concerning the administration of Scientology must
16 be authorized by CO CMO Int, who in turn must get approval from
17 Miscavige.

18 **Marty Rathbun was a Managing Agent of CSI**

19 209. When Marty Rathbun was Inspector General for Ethics, he
20 was a managing agent of CSI. He oversaw all ethics matters in
21 Scientology. Within each Scientology organization he had
22 authority over all actions taken by ethics officers. He also ran
23 the Office of Special Affairs, which deals with all matters
24 external to Scientology such as public relations, litigation,
25 intelligence actions, and so on. OSA also has an internal
26 security function within the Scientology organizations, and I/G
27 Ethics commanded all of those functions as well. He ran all OSA
28 activities via OSA Int, which is in CSI. All directives

1 concerning ethics matters within Scientology organizations, and
2 all directives concerning OSA activities of any kind, had to be
3 approved by I/G Ethics, who in turn had to have the approval of
4 Miscavige.

5 Norman Starkey is a Managing Agent of CSI

6 210. Norman Starkey, Trustee of Hubbard's estate, is a
7 managing agent of CSI. Starkey has been one of Miscavige's most
8 senior lieutenants for many years. In 1981 Miscavige put Starkey
9 in charge of the Guardian's Office, running all the Scientology
10 litigation in the world, particularly any litigation that
11 threatened Hubbard. As Special Project Legal, Starkey was one of
12 the people most senior to the Guardian's Office, which later
13 became OSA Int, which is part of CSI.

14 211. In 1982 Norman Starkey became Legal Affairs Director at
15 Author Services, Inc. (ASI) directly under Miscavige. Miscavige
16 was COB ASI at the time and ran all of Scientology from this
17 for-profit corporation, a corporation which supposedly had no
18 ties whatsoever to the Church of Scientology. It had no corporate
19 ties, but in reality ASI ran the entire church from 1982 until
20 1987, when Miscavige decided to move over to RTC and become COB
21 RTC. This was done because it was more defensible to run the
22 church from a nonprofit corporation than from ASI.

23 212. When Miscavige moved over to RTC, Starkey was trustee
24 of Hubbard's estate. He ran ASI and CST for Miscavige with no
25 position other than his initials, "NFS." He continued to send
26 orders into the church, but via a unit called Corporate Liaison
27 to dilute the connection.

1 213. In March 1985 Starkey filed a declaration in The
2 Founding Church of Scientology of Washington, D.C., Inc. v.
3 Director, Federal Bureau of Investigation, et al. in which he
4 attempted to cover up Hubbard's role as managing agent of
5 Scientology (attached as Exhibit 35). As part of his declaration
6 he provided a white-washed version of how Author Services, Inc.
7 was established, describing it as if he and Terri Gamboa just
8 thought of the idea one day out of the blue, as opposed to
9 Hubbard ordering every last detail of the company and how it
10 would operate. He also attempted to distance ASI from the network
11 of Scientology organizations, falsely stating that ASI was not in
12 the business of managing the Church of Scientology, although all
13 aspects of Scientology management were at that time run out of
14 Miscavige's office at ASI.

15 214. But in paragraph 7 of his declaration Starkey made a
16 startling admission, namely that the Sea Organization called upon
17 him "from time to time" to render his services "to the
18 propagation of this religion."

19 215. What this means, and what is still the case, is that as
20 the senior officer of the Sea Org, Miscavige can order Starkey to
21 carry out whatever orders he deems appropriate, including but not
22 limited to directing the affairs of CSI and, via CSI, other
23 Scientology organizations.

24 216. As the head of ASI, Starkey ran programs and projects
25 that were initiated by his juniors at ASI who were ordering
26 church personnel in writing, in person, and on the phone on how
27 to conduct business within the church to produce income for ASI
28

1 (and, therefore, Hubbard). All of this was done with the
2 knowledge and consent, if not under the direct orders of
3 Miscavige. Regular reports were made by ASI staff to Starkey
4 regarding the programs, projects and orders he issued that
5 involved CSI staff and operations.

6 217. CSI President Heber Jentzsch received orders regularly
7 from Miscavige and Starkey on how to conduct his office and how
8 to conduct public relations actions as if they were his own ideas
9 (so as to hide the command lines from Miscavige and Starkey).

10 218. Church staff also know that disclosure of the
11 relationship between Starkey and CSI or any admission that ASI
12 was in direct command would have been reason to remove them from
13 their position and have them transported to the Rehabilitation
14 Project Force. (People on the RPF are kept under 24-hour guard to
15 keep them from escaping.)

16 **Miscavige Ordered This Case Dismissed To Protect Himself**

17 219. Dr. Geertz and Mr. Fishman would have won this case on
18 its merits had it gone forward. Instead, the Scientologists
19 staged an elaborate charade to avoid having the truth come out
20 not only at trial but also in depositions of Miscavige and his
21 key lieutenants. They thought they would be able to win this case
22 easily and then use it in their \$485 million suit against *Time*
23 magazine.

24 220. But they have finally met their match. Dr. Geertz's
25 attorneys Graham Berry and Gordon Calhoun educated themselves,
26 with the help of several former high-level Scientologists, about

27 ///

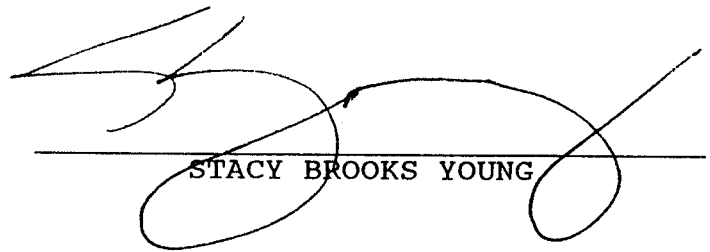
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1 how the organization actually works. They discovered what the
2 structure of the organization really is, that the Sea
3 Organization runs Scientology, and that Miscavige runs the Sea
4 Organization. They successfully pierced the corporate veil, and
5 the Scientologists saw that if they allowed this case to go to
6 trial, their carefully created public persona would explode into
7 a thousand pieces and they would be exposed for the criminal
8 conspirators they really are. This is why they sought to have
9 this case dismissed. It had nothing to do with any concern for
10 the Scientology celebrities whatsoever.

11 221. Miscavige feared that his own perjury and criminal
12 actions would be exposed, and he ordered the attorneys on this
13 case to do whatever they had to do to get rid of it before he had
14 to testify either in deposition or at trial. No one but Miscavige
15 has the authority to have ordered the Scientology attorneys to
16 file for dismissal. Without any doubt, Miscavige personally
17 orchestrated the dismissal of this case. See Exhibit 36, "Report
18 of the Board of Inquiry into Scientology," by Kevin Victor
19 Anderson, Q.C., the lieutenant governor of the State of Victoria,
20 in the Commonwealth of Australia. It is a thoroughly researched
21 report on the dangers of Scientology, and includes an account on
22 pages 134 and 135 of a woman who was "processed into insanity."
23 This report led to Scientology being banned in Victoria for a
24 number of years. Although the ban was later lifted, the report
25 remains an excellent overview of the Scientology cult.

26 I declare under penalty of perjury under the laws of the
27 United States of America and the State of California that the
28 foregoing is true and correct.

1 Executed in Corona del Mar, California, this 9th day of
2 March, 1994.

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5 _____
6 STACY BROOKS YOUNG
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