## DECLARATION OF ROBERT GEARY, D.D.E.

I, ROBERT GEARY, declare as follows:

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I have personal knowledge of all facts contained within this declaration and if called to testify to those facts, I would be competently able to do so.

I am a dentist and reside in Medina, Ohio.

Sometime around April of 1988 I received a brochure through
the mail from Sterling Management Systems of Glandale,
California. The brochure dealt with an introductory course that
Sterling Management Systems was giving pertaining to the
management of the dental practices. I decided to attend the
introductory seminar and signed up both myself and the staff of
my dental practice to attend a seminar which was conducted around
the beginning of May of 1988.

Prior to attending the introductory seminar, Sterling Management Systems sent out personality profiles to be completed by myself, my staff and my wife. The personality profile seemed to ask a number of personal quantions but at the time I was not pertionlarly concerned. AS 4,

I attended the introductory seminar with my staff and found it to be a high intensity experience. I was impressed by the dedication of the leaders of the seminar who seemed to almost be under pressure to perform. At the seminar I heard some mention that the management techniques taught by Sterling Management Systems had been authored by L. Ron Hubbard who was described as a science-fiction writer, a great businessman and the founder of Dianetics. I do not recall any mention being made at the introductory seminar of the Church of Scientology.

Near the conclusion of the introductory saminar it seemed to me that the seminar leaders orchestrated a situation to separate me from my staff. They asked me to stay behind to review the results of the personality profiles filled out before I took the introductory course. They pointed out a number of significant were revealed by the personality profiles and exerted significant pressure on me to sign up for Sterling Management's courses offered in Glendale, California. I was somewhat reluctant to sign up and they had me call several persons who purported to be dentists who were satisfied with Sterling who gave their endorsement of the courses. I felt like I was pressured and could not leave until I signed up.

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I am aware of the attached definition of "hard sell"
(Exhibit "A") and I now feel that hard sell technique was applied to me to get me to sign up for the Sterling Management courses in Glandale.

Since I had used my American Dental Association Gold Card to sign up for the introductory Sterling seminar, the course leaders knew that I had this card available and before I left the introductory seminar, I signed up for the management course in Glendale, California which cost approximately \$10,500.00.

I signed a copy of a contract with Sterling Management with reference to taking these courses. Although the contract may have mentioned L. Ron Hubbard and Dianetics, I do not recall any mention of the Church of Scientology. A true and correct copy of the contract I signed with Sterling Management is attached hereto as Exhibit "B". Immediately after signing up for the Sterling Management courses in Glendale, California, I came under intense

pressure to begin the courses immediately. However, I resisted this pressure as it was simply impossible for me to abandon my practice on such short notice. I therefore informed the Sterling Management staff that I would be attending the course in approximatley a month's time. Before I even left the introductory Sterling seminar I found myself having what I now recognise as Scientology terminology implanted in place of my own. I was told about 'potostiel troub

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The next day after having returned home from the introductory seminar, I received a telephone call from a Sterling representative who inquired as to whether any "petential-trouble sources" were trying to talk me out of attending the seminar. The Sterling representatives kept up a regular contact with me in order to assure that I stayed on course to attend their saminar in Glandale, California. A personality profile i field questiment were sent for my wife, staff me fill out prior to the course." Rec I made arrangements to take two weeks off of work so that my wife, and two daughters, and I could travel to Glendale. Sterling Management seminar was seven days in length and I intended to attend the seminar for the first week and then take a 20 second week of vacation. My wife and daughters were going to go to the beach and Disneyland and generally vacation while I was attending the seminar.

When I arrived at Sterling Management's headquarters, I sat in the reception area for awhile and then was called in and more information of a personal nature was extracted from me. that I was being shuffled from one person to another. All the personnel at Sterling Management were friendly and smiling but very businesslike. My first suspicion with reference to Sterling Examagement was when they started asking me questions as to why I was attending their management saminars. They inquired as to whether I was there of my own free will or whether I was there to investigate Sterling Management and if I worked for a newspaper. I apparently passed through this inquiry and eventually was introduced to my course consultant, Lee Cambique. Ms. Cambique went over my personality profile and identified a person that she said was a hostile staff member or potential trouble source. Hs. Cambique then started me on the courses that I had signed up to take. I was in a course room with other dentists taking courses and it appeared that one could come in at any time and simply start taking the courses rather than there being any set course time. We worked out of workbooks which had checklists for a large state as we wave tested, and person to test himself on the course content. In addition, we were required to make clay figures to illustrate to our course supervisors that we understood the principles we were working I took such courses as the TR Drille 0, 1, 2, 3, Communication Courses and Word Clearing.

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At the time I thought the courses were somewhat simplistic 20 but I wanted to believe I was going to get what I paid for. I horiced that many of the course supervisors were very young and I Was curious as to how they could teach us business management practice. This feeling was reinforced when I found out that Lee Cambique was an ex hygienist and wondered what she could teach me about dental management.

I later came to learn that the courses I was taking at Sterling were an introduction to Scientology, although I was not aware of the fact at that time. I now feel that what I was

learning at Sterling Management Systems was simply an introduction into Scientology and was making me over into a Scientology salesman.

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During the course of my seven days at Sterling Management I was being continually pulled out of the course room to be taken to other rooms where I would be subjected to intense pressure to buy books, prints depicting various science-fiction themes by L. Ron Hubbard, etc. I was eventually pressured using the "hard sell" technique to become a member of an organisation by the name descriptions a of Concerned Businessmen This organisation was purportedly an anti-drug group. The alleged benefit to me of being a member of the Concerned Businessmen group was publicity for my practice. I was to spend, \$3,500.00 to reach a very small number of people with a mailer addressing my concern about the drug problem in our community. In order to do this, I had to reveal a list of all my patients. Although I was quite uncomfortable with this scheme and knew that the \$3,500.00 I was paying was all out of proportion to the alleged benefit, I felt like I was powerless to get out of the room and back to what I came to do and was paying to do, i.e., take a management course until I signed up for the I eventually signed up by using a credit card knowing that as soon as I was able to do so, I would cancel the purchase. I later in fact cancelled my payment for a Concerned Businessmen Association .

The way the courses were structured at Sterling Management Systems, I would arrive at the offices at \$:00 in the morning and although they were scheduled to last only until 5:00 in the evening, they would generally stretch out until 10:00 or 11:00 at

1 inight. This went on all seven days. On one evening we received a lecture from a representative from the Orange County organization of the Church of Scientology whose I hame I believe to be Mark Scheffler. Mr. Scheffler later came into the course room and was recruiting students to take courses at the Orange 5 County Organization of the Church of Scientology. I myself was recruited by William Bradham, a recruiter for the Church of Scientology, San Francisco Organization. Mr. Bradham and Mr. Scheffler stated that they "used" Sterling offices. While I was at Sterling Management taking courses, several dentists were 11 pulled from their "business management courses" at Sterling and 12 sent to the Church of Scientology in Orange County for auditing 13 rather than finishing their Sterling courses. The 'hook' used for selling auditing was that the students were being sent out for more detailed interpretation of their personality profiles. When I was recruited, I was taken into a small room that reminded me of rooms in auto dealerships used to close sales. 17 Mr. Bradham informed me that he was a representative of the 18 "Diametics Center" in San Francisco, but did not state that he 19 was a representative of Scientology. He gave his personal success story with reference to Dianetics stating that it had

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"Dianetics Center" in San Francisco, but did not state that he was a representative of Scientology. He gave his personal success story with reference to Dianetics stating that it had saved both his business and his marriage. He informed me that he felt a close kinship to me because of the personal problems I was experiencing. Mr. Bradham seemed to have possession of a great deal of personal information about myself and it was only later that I realized that he must have gotten that information from field qualification. As Schiller Continued the personality profiles that were filled out by my staff, myself, and my wife. Mr. Bradham knew personal information that

he could not have obtained any other way.

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Mr. Bradham used a "hard sell" approach to convince me to take Diametic auditing courses. I was in the room with him for two to two and a half hours. Although I was not subjected to any physical restraints, I felt I could not leave the room without his permission although this was taking time away from the expensive courses I had signed up at Sterling to take. informed by one classmate that he had spent at least six hours in one of these rooms being subjected to the same type of sales pitch by Mark Scheffler of the Orange County Organisation.

In order to get out of the room and get Mr. Bradham off my 12 back, I advised him that I didn't think it would do any good to get audited if my wife was not also going to be audited. I informed him that my wife was not at all interested in getting involved in auditing and therefore I could not get involved. I knew for a fact that my wife, Dorothy was not interested in being involved in this experience and in fact, was not even in favor of my taking the expensive Sterling courses. Nevertheless, I went back to my wife and asked her if she was interested in being audited and she replied that she was not.

The next day when I arrived at Sterling Management I was surprised to see my wife in the hallway with Mr. Bradham who seamed to be quite pleased. Sterling Management had apparently called her at the hotel and convinced her to some in to Sterling 25 | Management in order to support me in my endeavers. Since my wife has always been very supportive of me, she consented to come in. I was informed by Mr. Bradham that my wife had already signed up for auditing so I felt I had no choice but to also sign up for

auditing. Sterling Management played my wife and I off each other in order to sell these auditing courses.

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By the end of the week students were figuring out that there was a Scientology connection to Sterling Management. All the instructors seemed to be Scientologists and none of us knew exactly what the connection was. I know that there was a controversy over Scientology and that it was considered a religion. At the time I did not understand I was being indoctrinated into Scientology dogma. I now know that the communication courses and what I was being taught about the Tone Scale was in fact part of the religious belief system of Scientology.

While I was at Sterling Management I wrote up a number of "success stories". These "success stories" were an absolute requirement in order to complete the courses I was taking. If bhe did not write up an adequate "success story" one could not complete the course work.

After my wife and I were signed up for the auditing courses a the San Francisco mission, I was put under pressure to take the second week of the time I was to spend in California and go immediately to San Francisco to take auditing. I resisted this pressure and informed them that we would be taking the courses in approximatley a month. Between the time I left Glendale and the time I arrived at San Francisco approximately a month later, Lee Cambique and representatives of the "Dianetics Center" in San 26 Francisco were in constant contact with me. I was given a lot of 27 reading to do and many statistics to keep. I had to set up an 28 Drg Board" for my practice and at the same time take care of the

backlog of patients accumulated while I was at Sterling. I felt that I was so busy I could not think straight.

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The basic auditing courses that my wife and I signed up for in San Prancisco cost approximately \$2,200.00 apiece. At the time I had some positive feelings about Sterling and felt that I wanted to make sure that my investment would pay off for me. When I travelled to San Francisco, I took one staff member, a receptionist and my two daughters with me. The staff member took some basic communication courses while my two children took some communication courses, both of which they stated they hated. The arrangements for accommodations in San Francisco were made by the Dianetics Center. The Dianetics Center in fact turned out to be located at the San Francisco "mission" of the Church of Scientology.

When we exrived in San Francisco we found that we were 16 ! staying at the Nob Hill Apartments which were absolutely deplorable. When I got to the San Francisco "mission" I went through a similar registration process as I had gone through at Sterling Management. I then signed up for courses, gave more personal information and began being shuffled from room to room and person to person.

. I was again interrogated as to whether I was at the mission 23 to investigate it or whether I was a representative of the press or psychiatry. The "ethics officer" for the mission, an ex dentist working full time in Scientology, inquired of me as to whether I had heard anything negative about Scientology. I informed him that the day before I had left for San Francisco, one of my staff members had given me a book entitled "L. Ron

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Hubbard, Messiah or Madman?". I had not had time to read it but had only read the cover. The ethics officer reached into his desk and pulled out a thick rebuttal to the book which purported to contain declarations rebutting each point made in the book. later found out that the rebuttal was not factual but at the time I was convinced by the Scientologists that the world around me was filled with potential sources and this was just another example of their handiwork.

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By this time I knew that I was involved in Scientology, but I still did not exactly know what Scientology was and continued to be subjected to a "hard sell" approach.

12 My wife and I underwent auditing at the San Francisco 13 mission for approximately a week. At the end of the week I was subjected to more "hard sell" to sign up for a "clear" package. 15 The package cost approximately \$50,000.00. The staff encouraged me and pressured me to allow them to call my bank to have the limits on my credit card lifted to pay for Scientology services. Kr. Bradham, who styled himself a "financial expert" had me fill out a financial statement in order to finance the "clear package". This was one of the biggest mistakes I made because it now gave the Scientologists a detailed blueprint of what my family's assets were and they systematically went after them one by one.

Mr. Bradham encouraged me not to use my local bank to finance Scientology courses but convinced me that I could get a better rate at an Alaska credit union he had contacts with.

While at the San Francisco mission my wife and I both took auditing. The auditing I took was a very emotional process in

which I was hooked up to a "I-Meter" which I now know to be a form of a lie detector. I then confessed to the auditor under interrogation all types of personal problems which I felt would be kept confidential.

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Toward the end of the week at the San Francisco mission my wife and I were taken into the Chaplain's Office where the chaplain asked us to reveal intimate personal and marital problems and we were led into what was an orchestrated and successful attempt to cause a breach between my wife and I. had a huge argument as a result of being placed in this confrontational situation. The manipulation that we were being subjected to was mind-boggling. My wife was pressured to stay in San Francisco and undergo the Purification Rundown and initial auditing. We were told that there was a danger that if she came back to Ohio with me, our marriage would break up. I therefore left San Francisco with our receptionist and one daughter and went back to Ohio while my wife and the other daughter were moved to a new hotel and my wife continued to take courses at the San Francisco mission. She was to stay in San Francisco for only two weeks.

There was continued strong contact between Mr. Bradham and myself who made sure that I completed financing arrangements. When I returned to Ohio in August of 1988, I now had to take over my wife's job responsibilities in the office; payroll and accounts receivable. I had to take my regular patients plus the backlog of patients, take care of the house, my daughter and complete Sterling Management assignments. I was kept in a final continual state of exhaustion.

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My wife and I continued to call back and forth but the phone 1 calls were cold and impersonal. I felt she was being directed and monitored in what she said. Later, when she returned home to Ohio I found notes that were given to her to inform her what to say on the phone when she conversed with me. During this time Exhibit D established are period my wife was constantly calling requesting that more money be spent on Scientology courses and materials. In the orchestrated phone calls I would be told that my wife had already made out counter checks and that I would have to cover the debts. Additionally, I was being instructed to cash in IRA accounts and 11 mortgage the house to feed a growing Scientology habit. My wife 12 was being sold "special property" books by L. Ron Hubbard as investments which would finance our childrens' college education. Every asset my family had was being systematically targeted and attacked. I was being told to take out one loan to cover another and to take out home equity loans on our house. Even though my wife had not yet completed the auditing in the clear package, she was purchasing auditing at a higher level from the Flag Service Organization of the Church of Scientology in Clearwater, Florida. 19 20 While my wife was in San Francisco alone, my office staff 21 and myself were required to attend a Sterling Management Systems 22 I seminar in Chicago. While attending the course, Mr. Bradham arrived with a Scientologist auditor. They pulled me out of the 23 course and away from my staff and took me to a hotel where they 24 audited me on the E-Meter. The auditing was done because they 25 I were concerned about my "money button" due to my resistance to 26 I 27 the inordinate financial demands Scientology was making on my 28 family.

immediately ran downstairs and confronted Mr. Mancini who took

cut the red volumes of the religious doctrine of the Church of

Scientology and assured me that this was either a PTS 1 or a PTS

problem and that he was there to handle the situation.

Arrangements were made for my wife to come home. Mr. Mancini

went to the airport the next day to meet her but I received a

phone call from my wife that she had gotten off the plane when it

had landed in Atlanta and she was not sure where she was or where

she was to go. She didn't know if she was flying to San

Prancisco or Ohio. She was in such a distraught state that she
needed someone to direct her in order to get her home. I helped
her out with what to do and she eventually arrived home.

It became obvious when my wife arrived home that she was not in fact "okey". The San Francisco organisation sent a lady chaplain by the name of Debbie Scanlon to live with us along with Kr. Mancini. I now had two Scientology staff members living in the house. They purported to know exactly what to do to cure my wife and they were doing a "destimulisation" by taking my wife for long walks and depriving her of stimulus such as reading and watching TV. This "therapy" seemed to make no sanse but at the time I seamed powerless to resist Scientology as I had now been completely convinced that psychiatry was bad and that if I went to my family doctor, he would refer her to a psychiatrist who would subject my wife to electroshock and she would never be the same. During this period my wife was not sleeping, she was on a crasy diet and was disassociating.

This situation went on for approximately two weeks when

1 everyone finally became convinced that things were getting worse. After inquiries at the Flag Service Organization, it was determined that either I was a suppressive person toward my wife or there was simply too much stimulus in town and this was the potential trouble source. They convinced me that they needed to take my wife back to San Francisco. They required me to buy the airline tickets and they even wanted money to rent a house.

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It was arranged that Sarah Tickner would be my contact person at the Church of Scientology mission. She was to call me on a daily basis but in fact only called me once or twice. 11 William Bradham's wife, Caroline Bradham, became my next contact person and arranged for my wife to be kept at what was described as 'mountain retreat'. This turned out to be a rundown cabin somewhere near Redford, California in the Mount Shasta area. For approximately two weeks my wife was virtually completely incognito at places unknown to me with three men constantly watching over her. I received constant assurances as to her condition but no solid information as to where she was or how I could contact her.

At the end of two weeks, my wife finally was allowed to sall 21 me. After the phone sall I was in our bedroom. Around me were approximately 30 large boxes of books that my wife had purchased 23 that had been sent to our house. They were sitting there 24 unopened and I opened the boxes and began reading the material. 25 The boxes contained many advanced courses in Scientology and only 26 after I began reading these courses did I realize that there was 27 much I did not know about Scientology and I did not believe in, such as their belief in past lives, and I began to come to my

1 senses and realize what my wife and had been going through.

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During this time period the Scientologists had sent two 3 other scientologists to town who were living in a hotel and kept 4 insisting that I come to the hotel to be audited over my "money button. These Scientologists had been sent from California and one was a representative of the Office of Special Affairs of the Church of Scientology while the other was a Class V auditor. They kept attempting to get me to come into the hotel and be 9 audited on the E-meter with reference to my "money button". I 10 had been constantly in contact with the Church of Scientology to 11 go over the receipts and determine what was owed and obtain an 12 accounting, as I knew we owed a large amount of money. Instead, 13 they wanted to audit me regarding my "money button". They tried 14 to suggest to me that my wife's problems were due to "withholds" 15 and my wife was possibly having affairs. This was the final 16 straw for me as I knew my wife well and I knew this was an 17 absolute falsehood.

I contacted our family doctor and talked to him about the 19 problems my wife was experiencing. He gave a probable diagnosis 20 of an acute psychotic episode caused by trauma and stated that 21 the potential treatment would be a simple hospitalisation where 22 my wife would be given some drugs in order to allow her to rest 23 and when she had enough sleep, she could begin to sort things 24 out. I was surprised when my family doctor told me there was a 25 help group already waiting for me if we asked for help. This 26 help group consisted of my friends and the staff at my dental 27 practice, my attorney and family doctor who were aware of and 28 concerned about my family's cituation.

I met with my attorney who then had me call the Scientology Office of Special Affairs representative and auditor into my attorney's offices. My attorney told the Scientology representatives that they were to immediately inform us where my wife was being held captive and fly my wife home with an escort for the trip and refund to my family all the money for unused expenses. He informed the Scientology representatives that if they did not meet these demands he would be contacting the media and making sure that our family's story got a considerable amount of coverage.

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11 My wife was back in Ohio within 48 hours and when I met her In order to obtain these checks, I had to sign a release. 13 still out of pocket somewhere between \$50,000 to \$100,000 for 14 15 Scientology services, airline fares, living expenses, etc. In 16 all, I estimate that between May and October of 1988 my wife and I spent somewhere in the area of approximately \$180,000 for 17 18 Scientology services. This was money we could obviously not afford to spend and without extreme undue influence there is absolutely no way we would have ever eyent such sums. I have read a considerable amount about mind control and now realise 22 that my wife and I were under mind control.

It has now been approximately five years from this experience. The first year was the worst for my wife and myself, but every year has gotten better. During the first year there were constant flashbacks to the experiences my wife and I suffered at the hands of the Church of Scientology.

There is absolutely no question in my mind that the Church

of Scientology constitutes a destructive cult. I have personal knowledge and experience with them. Sterling Management Systems of Glendale, California is a branch of Scientology that is diaguland as a secular management company and used to recruit new members into Scientology. I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 5th day of Sophie Lee. 1993 at Medina, Ohio. ŽŠ