

DECLARATION OF MICHAEL RINDER

I, MICHAEL RINDER, declare as follows:

1. I am over 18 years of age and a resident of the State of California. I am a director of the Church of Scientology International ("CSI" or "the Church"), the mother church of the Scientology religion. By virtue of my position, I am familiar with the Church's legal affairs, and I have personal knowledge of the matters set forth in this declaration. If I were called upon to do so, I could and would competently testify thereto.

2. In July 1994, another Church staff member, Michael Sutter, and I spent several days in Seattle, Washington, meeting with apostate Scientologists Stacy and Robert Vaughn Young. The Youngs left the Church in 1989, and approximately four years later, in 1993, they appeared as witnesses for hire in litigation against Churches of Scientology, Scientologists or businesses owned by Scientologists. Among the attorneys who hired and paid the Youngs for their testimony was Graham E. Berry of the Lewis, D'Amato firm, who used their purchased testimony many times in Church of Scientology International v. Fishman and Geertz, No. 91-6426-HLH (Tx) (C.D.Cal.).

3. The Youngs' activities had resulted in the Church spending considerable time and energy to correct the falsehoods they had injected into these lawsuits. So we travelled to Seattle to meet with the Youngs in the hope that direct communication with them might lead them to correct their false statements and cease their campaign against the Church. We explained this purpose for our visit when we met with the Youngs first on July 9, 1994. We told them that recently several other

1 litigation opponents of the Church had stated that they had
2 wished we had been in direct communication earlier and it may
3 have prevented years of litigation and disputes. We told the
4 Youngs that we sought to avoid that same situation from occurring
5 with them.

6 4. We were direct and forthright with explaining why we
7 wanted to meet with them. At the beginning of our discussion,
8 both of the Youngs stated that they did not enjoy manipulating
9 the facts to attack and embarrass their former religion, but that
10 economic hardship had compelled them to embark upon that course.
11 At the end, however, it was clear that "economic hardship" was
12 simply a euphemism for amoral greed. Their professed guilt about
13 the dishonest quality of their sworn statements could not
14 overpower their craving for money. Thus, we resolved nothing in
15 those talks.

16 5. Stacy told us that she believed that it would be in
17 everyone's best interest for the conflict between the Youngs and
18 the Church to end. It was apparent that the reason they were
19 talking to us was because they found it emotionally distressing
20 to be involved in an occupation that required them to figure out
21 how to manipulate and distort facts for use in litigation. Stacy
22 said she could not stand living a lie and wanted out, and that
23 Vaughn also "hated" being involved in the litigation. We
24 explained that we simply wanted to resolve matters, get the
25 record set straight, and the Church and the Youngs could get on
26 with their respective lives. They agreed that this was a
27 desirable objective.

28 6. Stacy recounted the story of what had happened to them

1 and how they had come to get involved with writing declarations
2 in the first place. She said that neither she nor Vaughn were
3 good with money and that after leaving the Church in 1989, they
4 had run up tens of thousands of dollars in debts. She said that
5 they first tried to live off various family members while Vaughn
6 attempted to establish himself as a writer. The family
7 eventually balked at that, and the Youngs were on their own. She
8 said they used up their savings and over-extended their credit
9 cards in an unsuccessful attempt to create a computerized,
10 desk-top publishing business. Stacy said that she and Vaughn
11 both wanted to work as writers and eventually took a series of
12 jobs in several small newspapers in the San Diego and Newport
13 Beach areas. These jobs did not pay well, and they were heavily
14 in debt when the last paper for which they worked went bankrupt.
15 Their financial situation worsened as Vaughn was unemployed and
16 refused to take on any employment other than as a writer. Stacy
17 earned the only income, working for an insurance sales firm which
18 she said she hated.

19 7. Stacy told us that their financial situation deteriorated
20 to the point that she had threatened Vaughn with divorce if he
21 did not get a job. Vaughn then got a job driving a taxi cab. He
22 was unable to continue this however, when, after running out of
23 gas, he attempted to push his vehicle, lost control of it, and
24 injured his leg. Additionally, Stacy said she had suffered a
25 tubal pregnancy, necessitating an operation. Between the medical
26 bills and the lack of a steady income source, Stacy explained
27 that they ended up more than \$50,000 in debt. It was in those
28 circumstances that the Youngs turned to trafficking in

1 anti-Scientology allegations as a means of making money.

2 8. Stacy said that in early 1993, at the depth of their
3 financial crisis, a British anti-Scientologist, Jon Atack,
4 introduced them to an active anti-religionist in the Los Angeles
5 area named Priscilla Coates. It was through Coates and her
6 attorney, Daniel Leipold, that the Youngs connected up with
7 Graham Berry, for whom they eventually became paid "consultants."

8 9. At one point in our conversations, Stacy broke into tears
9 and said that she and her husband only began consulting with and
10 selling declarations to Graham Berry because she and Vaughn were
11 so desperate for money. Stacy said she had been willing to say
12 under oath whatever Berry wanted her to say if it would result in
13 getting paid, as she could not face continuing to live under the
14 financial pressure she and Vaughn were suffering. Stacy said that
15 she had made a vow, like Scarlet O'Hara in Gone With The Wind,
16 that no matter what it took, she would never be poor again.
17 Vaughn explained that it was "a great way to utilize twenty years
18 that I was trying to avoid on my resume," and that he could work
19 one afternoon and make what would be a weekly salary in any other
20 job.

21 10. In the course of the discussions, both Mike Sutter and I
22 brought up how we could not understand how they could tell so
23 many lies in the declarations they had filed, especially those in
24 the Fishman case. Neither denied that this was what they had
25 done, but explained that in order to be able to survive, they
26 provided testimony requested by the attorneys, and that they had
27 to write what was wanted or they would not get paid. Stacy said
28 it was "obvious" they would not be paid to write things that

1 would be helpful to the Church.

2 11. We challenged them to explain how they could justify
3 lying as a way of life, and they told us that what they had
4 mostly done was twist facts and used "creative writing" and
5 innuendo to paint a picture that was negative to the Church.
6 They explained that they had tried to avoid explicitly lying
7 about facts so they could not be accused of perjury. Vaughn
8 especially seemed proud of this, and said that he was a writer by
9 profession, which is why he was so good at preparing declarations
10 and why he was paid so well. He claimed that unlike the Fishman
11 case declarations of Andre Tabayoyon, Steve Fishman and Garry
12 Scarff, where the lies and inconsistencies were obvious, his
13 declarations were worded in such a way as to make them much more
14 difficult to discredit. Nothing he said ever disavowed his
15 explanation of how he manipulated facts to create false
16 illusions.

17 12. Both of the Youngs readily agreed that they could easily
18 set the record straight by writing new declarations which would
19 "clarify" the statements they had made previously. Vaughn said
20 that he did not want to write anything that would be a "direct
21 contradiction" to what he had written earlier, but this was
22 simply a matter of "interpreting" things differently. He said he
23 intended to make his career as a writer and would need
24 "credibility" in order to obtain future jobs, so wanted to do
25 this "properly."

26 13. Stacy said that by writing such declarations they would
27 "burn their bridges" with the anti-Scientology camp. She went on
28 to say that this would not be difficult to do as they did not

1 want to be involved in anti-Scientology litigation matters any
2 longer and in fact, they were "between jobs" at the time, so it
3 was an opportune moment to bring this entire episode in their
4 lives to an end.

5 14. Stacy and Vaughn spoke extensively about matters they
6 had put in earlier declarations during the course of several days
7 of meetings. They explained their true views and talked candidly
8 about many matters. For example, in the Fishman case, Graham
9 Berry wanted them to execute declarations to support the
10 contention that Steven Fishman was an experienced Scientologist.
11 Both Youngs said that this presented a problem as the very data
12 which Berry had given them to orient them to the "facts" of the
13 case proved that Fishman was a fraud. Upon reading Fishman's
14 unpublished manuscript, The Lonesome Squirrel, they told us they
15 had the same reaction: That Fishman was psychotic and that his
16 so-called experiences in Scientology described in his manuscript
17 never occurred. Stacy specifically mentioned by way of example
18 that the manuscript discusses meetings and activities allegedly
19 done by a Church staff member, Lyman Spurlock. Stacy said that
20 she knew that such incidents could not have occurred; that Lyman
21 Spurlock would never have done the actions Fishman alleged and
22 that Fishman's description simply does not match Mr. Spurlock.
23 Further, she knew that the meetings described between Fishman and
24 Church officials simply could not conceivably have occurred. She
25 said the whole manuscript was ridiculous, a fabrication. Vaughn
26 said he could not even finish the manuscript, it was so bad.

27 15. Similarly, they both described watching a video of
28 Fishman describing the operation of a Hubbard Electrometer

1 (E-meter). The video was supposed to demonstrate Fishman's
2 competence and knowledge in Scientology. The Youngs said Fishman
3 explained that the meter's "sensitivity knob" was used to keep
4 the meter's needle on its dial, and that this was such a
5 ridiculous mistake that they burst out laughing and knew with
6 certainty that Fishman was not an experienced Scientology
7 auditor.

8 16. Stacy also pointed out that they both knew that
9 Fishman's claims of having completed the Saint Hill Special
10 Briefing Course -- an advanced course in Scientology counseling
11 -- was a lie, that it was physically impossible for anyone to
12 complete the course in the six weeks Fishman claimed. In fact,
13 after recounting these facts, both Vaughn and Stacy stated that
14 they knew that Fishman and his co-defendant, Uwe Geertz, were
15 both crazy and that their allegations about Scientology were
16 false.

17 17. Stacy said she had to come up with a way of supporting
18 Fishman's claims for Berry because she needed the money. She
19 said she knew that she could not state in a declaration that
20 Fishman was a long-term Scientologist as that would be, in her
21 words, "completely untrue." Instead, she said that she played
22 with words and concepts so that she could, without directly
23 lying, construct a picture that would create the impression that
24 Fishman knew what he was saying about Scientology. She said she
25 even knew that Fishman was ineligible for Church services due to
26 an extensive history of psychological treatment, and to solve
27 that she had created a way of explaining his "involvement" by
28 alleging that "the Church had negligently allowed Fishman to read

1 church scripture," and that this "resulted in Fishman's mental
2 state deteriorating." She said that she knew his mental state
3 was not good, and that he knew some Scientology words and terms
4 (though he usually misused them) and therefore this was a
5 "credible" scenario that suited the attorney.

6 18. Stacy said that her theory was used to support the
7 contention that Fishman had been "exposed" to upper level Church
8 scriptures, even though he had never attained that level in the
9 Church and the materials are kept strictly confidential in the
10 Church.

11 19. She went on to explain that her distortions had extended
12 to allegations about brainwashing, and that here she had quoted
13 completely out of context from the writings of L. Ron Hubbard.
14 She gave this as a classic example of how one can distort the
15 facts. She said that it was ironic that while she was in the
16 Church she had compiled a pack of materials written by L. Ron
17 Hubbard where he had alerted people to the existence and dangers
18 of mind control techniques through the use of pain, drugs and
19 hypnosis. She had created the pack to rebut falsehoods presented
20 by Bent Corydon in his case against the Church and that it showed
21 that Mr. Hubbard was in the forefront of the condemnation of
22 brainwashing techniques and had developed the first techniques to
23 counteract it. For the Fishman case, however, she explained that
24 she took this very same material and pulled selected quotes out
25 of context to give her declaration a 180-degree reverse "spin."
26 Her Fishman declaration then gave the false impression that
27 Scientology techniques were mind control when, in fact, they are
28 just the opposite.

1 20. One of the falsehoods I brought up with Vaughn Young was
2 his allegation that David Miscavige was involved in the death of
3 his mother-in-law, and that Vaughn had stated that it was a
4 murder. He said that "if you read my statements exactly ('Mr.
5 Miscavige's behavior was overlooked in the investigation of the
6 death of his mother-in-law... She died... from three shots to the
7 chest and to the temple from a .22 rifle.') you'll see I didn't
8 say David Miscavige murdered his mother-in-law." I told him that
9 this was the impression he created and he replied "Exactly." He
10 said that he could never have directly made the accusation as it
11 wasn't true but he crafted his declaration to create that
12 impression.

13 21. Young said he had done the same thing when he attempted
14 to create the impression that the Church was involved in the
15 death of Steven Fishman's wife, even though he knew this was
16 simply incredible. However, he explained that they needed
17 statements that would support the defense's position, so he
18 worked with the material he had.

19 22. This is what led to him supporting Fishman's contention
20 that he had been ordered to commit suicide or to "do an 'end of
21 cycle.'" Young explained that the three words did have a meaning
22 in Scientology, and even though he knew that Fishman falsely
23 claimed the term was Scientology slang for suicide or murder, and
24 that this in fact was further evidence that Fishman was not a
25 Scientologist, he had enough to go on to fashion a statement for
26 a declaration that would be interpreted to support Fishman's
27 claims.

28 23. Vaughn also said that the Church could be poisoned by

1 throwing around numerous allegations about the Church ordering
2 people to commit suicide or murder. This was especially
3 difficult to respond to when the events were so old they could
4 not be objectively verified, and where no allegation of
5 wrongdoing had been made at the time, so it would be too time
6 consuming to attempt to correct them all.

7 24. Vaughn had further expanded on this theory when he
8 stated that one cannot simply leave Scientology -- i.e., cease
9 being a member of the Church -- because a Church policy states
10 that it is better that a person "be dead" than to not be a
11 dedicated Scientologist. Vaughn said he knew the quote was not
12 meant to be taken literally, but again, it was something that as
13 written he could not be charged with perjury for, yet he created
14 a completely wrong impression. Ironically, both of them
15 acknowledged that except for assistance from the Church to help
16 them retrieve their belongings after they abruptly left the
17 Church without notice, they had had no contact with any
18 Scientologists from shortly after they left the Church until they
19 began to file declarations against the Church, a period of more
20 than three years.

21 25. Stacy also talked about her assertions that the upper
22 level scriptures of the Church were in the public domain. She
23 was challenged on this and admitted that she knew that the Church
24 took great care to maintain the confidentiality of these
25 scriptures as a matter of religious faith and actively would seek
26 to prevent the improper distribution and exposure of these
27 materials. She said she was willing to withdraw her declaration
28 on this matter, as she knew how important this was to

1 Scientologists.

2 26. After Vaughn and Stacy had opened up and talked a great
3 deal about what they had been doing in their anti-Scientology
4 litigation, they also discussed some of the other witnesses who
5 had been hired by Graham Berry to attack the Church. Their
6 descriptions match my personal knowledge and made it obvious that
7 these are not credible witnesses. Stacy specifically mentioned
8 Gerry Armstrong and Larry Wollersheim, both of whom were also
9 paid witnesses for Berry. Stacy told me that Armstrong is
10 psychotic and lives in a delusory world in which he holds
11 conversations with God. She said that Wollersheim is as crazy as
12 Armstrong is.

13 27. They also talked about Andre Tabayoyon. Stacy was
14 especially upset about him, and described an incident in which
15 she and others were at the offices of Berry's law firm.
16 Tabayoyon was upset that he had not been paid and began yelling
17 in a wild and uncontrolled manner and threatening to kill people.
18 When Stacy told him to stop shouting and to act more
19 professionally, he began to make threatening remarks to her. His
20 yelling drew the attention of employees of the law firm who came
21 to see what was going on. When they arrived in the conference
22 room where Stacy and Tabayoyon were located, Tabayoyon abruptly
23 stormed out of the office. Stacy also told me that Tabayoyon
24 continually mistreated his wife, Mary, and that he regarded her
25 as a slave. Both Stacy and Vaughn found this conduct very
26 disturbing, and they said they would find excuses not to have to
27 socialize with the Tabayoyons because they were not good company
28 and had nothing worthwhile to say.

1 28. The Youngs said they would write declarations to set the
2 record straight on points described above along with others.
3 However, they said that as they would no longer have a source of
4 income they needed help in getting on their feet. They wanted to
5 get into the environmental or animal rights fields. They wanted
6 nothing to do with litigation any longer, and even said that once
7 they got established they might be able to help forward the
8 Church's environmental campaigns and programs. We said we would
9 try to help find them jobs and might be able to assist them with
10 a small loan or possibly even purchase of the rights to future
11 writings to help them while they embarked on a new career.

12 29. We suggested that while we made inquiries about possible
13 jobs for them, they should put together declarations which would
14 rectify the falsehoods and misimpressions they had created. They
15 agreed that this would be easy for them to do.

16 30. Mike Sutter and I returned to Los Angeles and contacted
17 Church staff and professionals who had connections in the
18 environmental and animal rights areas and lined up several
19 possible jobs for Vaughn and Stacy.

20 31. We returned to Seattle some days later to give Vaughn
21 and Stacy the good news about the jobs we had found. We thought
22 they wanted to resolve their differences with the Church and
23 settle down to an honest living and that this would come as
24 welcome news. It became clear almost immediately that they were
25 not interested.

26 32. They said they had not written draft declarations, and
27 in fact, had been thinking about it and had decided that they
28 wanted the Church to pay them \$540,000 -- enough money to live

1 without having to work for five years. They claimed that if they
2 were to set the record straight it would end their careers as
3 anti-Scientology consultants and that this was a lot of future
4 income to give up. They made no mention of the morality of their
5 position, and when challenged on it, merely responded that this
6 was just a matter of money, not of right and wrong nor truth or
7 fact. They would do and say whatever would make them money.

8 33. In an attempt to make their ridiculous demand sound
9 reasonable, they stated that even for \$540,000 they were not sure
10 that they would write the declarations to correct the record as
11 they had earlier agreed. They said that since we had left they
12 had been in communication with some people they refused to
13 identify, and had been given "legal advice" that if they were to
14 correct the declarations they had filed, the insurance company
15 could sue them for "breach of contract."

16 34. It should be made clear here that neither of the Youngs
17 has any claim against the Church and both have stated such when
18 asked this question directly in deposition. I brought this up to
19 the Youngs to make clear to them that they couldn't even have a
20 reason for thinking we owed them money. I told them that if they
21 wanted peace they had to voluntarily provide truthful
22 declarations to correct their lies and that we would not accede
23 to their extortionate demand. While admitting that we didn't owe
24 them anything for what they had done while in the Church, their
25 answer was simple. It was not a moral question. They earned a
26 good living distorting facts against Scientology, and for them to
27 stop, we should pay up. Vaughn Young summed up their position by
28 claiming that the more of an asshole one is the more one is

1 worth in this game.

2 35. I told Vaughn that I could not believe he was demanding
3 that the Church pay him an enormous amount of money so he would
4 not have to work at all. He became very indignant at this and
5 threatened that he would "do more" and that we would wish that we
6 had "paid him now rather than have to deal with what he would do
7 to us in the future."

8 36. Thus the Youngs ultimately refused to put down on paper
9 what they had so willingly told us in person, because we would
10 not pay them for the truth like they had been paid to lie.

11 37. The Youngs never retracted their admissions that their
12 publicly filed declarations created false impressions and
13 contained lies. In fact, they even said they would now have
14 difficulty carrying on with their "profession" as witnesses due
15 to what they had told us.

16 38. In summary, the facts are as follows: When we met with
17 them alone, the Youngs candidly admitted what we have been
18 telling the court all along, they have been lying and
19 intentionally distorting facts. They do it knowingly and will
20 readily admit to it outside the presence of an attorney or Court
21 Reporter. They feel comfortable in making these allegations
22 because they know that unfounded accusations against Scientology
23 are given much greater deference in the Courts than are false and
24 degrading accusations made about others. They saw this
25 themselves when they were in the Church, and now they exploit it
26 for cash.

27 39. No doubt they will now try to deny the facts laid out in
28 this declaration, but when they do so, their motivation should be

1 remembered. They still have their jobs as anti-Scientology
2 witnesses to protect.

3 I declare under penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct.

5 Executed this 27th day of October 1994 at Los Angeles,
6 California.

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8 MICHAEL RINDER
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