DECLARATION OF STACY BROOKS YOUNG

OF

LEWIS. D'AMATO
SBOIS & BISGAARD
LAWYERS DATE
SUITE 1200
N. FIGUEROA STREET

ANGELES, CA 90012 (213) 250-1800 I, STACY BROOKS YOUNG, declare as follows:

- 1. I am a resident of Corona del Mar, California. I have been retained by the law firm of Lewis, D'Amato, Brisbois & Bisgaard as an expert counsel and expert witness in the litigation captioned Church of Scientology International v. Fishman & Geertz, U.S.D.C. C.D. C.A. No. CA-91-6426-HLH. I declare that the facts contained within this declaration are within my own personal knowledge except those stated to be upon information and belief. If called upon to testify thereto I could competently do so.
- 2. At approximately 4:30 in the afternoon of Tuesday, February 1, 1994, I was sitting at my desk in the office of my home at 713 Marguerite Avenue, Corona del Mar, California. The office has a window which faces Marguerite. The left side of the window does not open, but the right side opens outward. I had the right side of the window open about 18 inches, as wide as possible. Beneath the widow are azalea bushes that come to the bottom of the window.
- 3. My desk is on the left side of the room and faces to the left. I was typing on my computer so that I was facing to the left, with the open window to my right. I was concentrating intently on what I was writing, when suddenly I heard someone rustling the azalea bushes outside the window.
- 4. I turned my head and saw a burly man leaning over the bushes coming right at the open window, with a police officer standing directly outside the open side of the window to the right, watching me. The burly man reached into the open window and dropped a brown envelope on the book shelf right inside the window.

Then he stuck his head in the open side of the window and yelled, "You're served, Stacy!" Then he disappeared to the left.

- 5. I was in a state of shock at having a man come in the window of my home while a Newport Beach policeman watched him do it. I kept my eyes on the policeman because I was afraid of what he was going to do to me. I saw that the policeman's name was Cantrell by the badge on his chest. He called in to me, saying, "Stacy, he called and asked that I come along to make sure everything was OK." I did not say anything in response because I did not understand what he meant and I was not sure what he expected of me. I felt the safest thing to do was to keep perfectly still and say nothing.
- 6. Then the policeman said to me, "Is everything OK? Is everything OK?" I still did not say anything but simply kept my eyes on him, making sure to keep my hands in clear sight on my desk so the policeman would not shoot me.
- 7. I wish to point out that the doorbell was not rung nor was their a knock on the door. The doorbell was tested and it does work. I was taken by complete surprise. This illegal entry was done without any attempt to contact me via the front door, and Officer Cantrell allowed this.
- 8. Finally, the policeman shrugged his shoulders and walked away, and I heard the burly man call out, "Thank you, officer." I was terrified for the rest of the afternoon because I suddenly felt that I was no longer safe in my own home.
- 9. Because of the work my husband and I have been doing in a number of legal cases involving the Church of Scientology, and because I am very familiar with Scientology's Fair Game doctrine

Lewis. D'Amato ISBOIS & BISGAARD LAWYERS DA'

N. FIGUEROA STREET ANGELES, CA 90012 (213) 250-1800

which calls for them to harass, intimidate and destroy anyone they perceive as an enemy of the church, we asked a Newport Beach policeman named Mark to our home, explained to him our situation and asked what could be done to protect us from Scientology's harassive tactics. He said that we could file material with the police department, which was done. The material included information on how Scientology uses private investigators to harass.

- 10. Until now I have felt very safe in Corona del Mar, feeling that the police would protect us as citizens of the town. But after the incident with the policeman named Cantrell I no longer feel the police will protect me from Scientology's harassment.
- 11. After the incident occurred I called my attorney, Graham Berry, who is a partner in the firm of Lewis, D'Amato, Brisbois & Bisgaard in Los Angeles, and told him what had occurred. He later told me that he called the Newport Beach Police Department and was told that Cantrell answered a "Keep the Peace" call from John Gaw, who I have been told by my attorney is a private investigator for the Church of Scientology. As I understand it, a "Keep the Peace" call is when a policeman accompanies someone when they are afraid the people they are going to visit might get violent.
- 12. It is a common Fair Game tactic by Scientology to lie about someone to get their neighbors, friends and business associates to turn against them. But I am extremely dismayed that a Newport Beach policeman believed this Scientology operative's lies about me to such an extent that he woul2d allow him to stick

Lewis, D'Amato ISBOIS & BISGAARD

his arm and head into the office of my home without ever even attempting to ring the doorbell of my house. This is a very frightening turn of events for me and makes me feel that if the Scientologists can turn the police department of my own town against me, I am no longer safe even in my own home.

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

Executed on February and, 1994, at Corona del Mar, California.

Stacy Brooks Young

28
LEWIS, D'AMATO
SBOIS & BISGAARO
LAWYERS DATA94LA: 3788.1