STATE OF FLORIDA)	
)	SS.
COUNTY OF PINELLA	4S)	

AFFIDAVIT OF SARAH HELLER

SARAH HELLER, being first duly sworn, deposes and says:

- 1. I am 18 years of age. I make the following statements of my own personal knowledge, and if called upon to testify as to these matters, I could and would do so competently.
- 2. I knew Zoe Woodcraft fairly well when I was in the Cadet School. She was always reading and seemed quite smart. She seemed very happy most of the time and seemed to enjoy herself. She was very proud of her siblings who were in the Sea Organization and spoke to me several times about them. I rarely heard her speak of her father and when she did, it did not sound like she had much of a relationship with him. The most she would say was something on the order of "oh, my father lives in California and is not in the Sea Organization".
- 3. I was in the Cadet School from 1990 to 1995. After that I went on the Estates Project Force, which is the project one does when first joining the Sea Organization. I am currently a member of the Sea Organization and work at the Church of Scientology, Flag Service Organization (generally called "Flag" or "the Church"). I continued to get regular schooling at the Cadet School until 1998, after which I took the

GED exams and earned my high school diploma at age 16 (the youngest you are allowed to take these tests in Florida).

- 4. When I first arrived from England in 1990 I lived at the Hacienda Garden Apartments with my mother. I was picked up by a Church bus and taken to the Cadet School every day and then brought back to my apartment in the evening to where I lived with my mother.
- 5. Two years later my mother moved to the staff housing located at the Cadet School and I lived with her in a room there. I saw my mother all the time and she was definitely a part of my life.
- 6. A year after that my mother moved to a different room and the room I was in became a dorm where I chose to stay.
- 7. From 1990 until about 1993 my father continued living in England. I would spend four months out of the year with him, and be at the Cadet School for the other eight months. No one at the Cadet School had a problem with me doing this, and there was no pressure on me to cut my trip to see my father down to three weeks, which is usually the time given for such trips. When I came back from seeing my father, they always welcomed me and did what they could to make me feel at home. (As you can imagine, it can be awkward for a nine-year-old to return somewhere after they had been away for four months.)
 - 8. Although the schedule was different at different times while I was at the

Cadet School, it was separated into school time, work time and Scientology study time.

- 9. At school there were several different courses you did. The emphasis was on the three R's, but there were many other things you could do. There were science courses, research projects, geography, history, etc. The school time was simply that: school. There was a separate time (at night) which was for "Scientology studies". For the most part, one would master the basics of the three R's before moving on to the other courses. This was done so that you could more easily study those subjects.
- We were encouraged to read. In fact, at one point, we had a game where if we read a certain number of books, based on our individual reading levels and vocabulary, we were given a certificate for a free taco from Taco Bell. The certificates were handed out each week and all of the people who received them went out to Taco Bell to celebrate. Another game we had was similar, except that we would go to Pizza Hut at the end of the month. During the summer the public libraries would have reading games where you would get a token for each book you read and then go to their "shop" and "buy" things with the tokens. We were encouraged to participate in this game. Additionally, while they were not books, practically every cadet had stacks of Archie magazines and they were traded around between cadets. Teen magazines were also read. Reading these were not discouraged.
- 11. I would go to the Clearwater Public Library almost every Saturday and get about twenty books to read. No one ever looked through my books to see if they were

"okay", no one ever said that there were books that I could not get.

- Work time could mean several different things. There were people who were "missionaires" who would do "missions" at Flag, helping out in different areas.

 Some of the "missions" I personally did were filing, helping out in one of the treasury offices, and grading the tests that Scientologists take while receiving religious services at Flag. All of the cadets enjoyed doing these "missions" and if someone did not want to do it, they were not made to go.
- 13. Other cadets did cleaning, and small fix-ups around the Cadet School. This is what one would normally start out doing and then as you showed responsibility and good discipline, you would move on to other things. This was not usually strenuous work, but things like cleaning the dining room, painting some walls, weeding, etc.

 Sometimes heavier projects would be done, but in that case, it would be done by the older, stronger cadets (mainly boys, although girls would help as well if they wanted to).

 Any very strenuous or possibly dangerous work would be done by adults.
- 14. Some cadets were Cadet School executives. These cadets had demonstrated an ability to be responsible for the other children and ensure that they were getting their projects done. Additional posts that were held by responsible children were in the Treasury and Qualifications divisions.
- 15. The disciplinary system used by the school is called an "awards and penalties" system. The basic theory of this is that when one does well, one is awarded

and when one doesn't he is penalized. The idea is to encourage people to want to do well. When one does well, it is called being "upstat" or "upstatistics" and when one isn't doing well one is "downstatisics or "downstat." Things such as cleaning one's room, being mannerly and finishing one's school work are given points. Depending on the number of points you had, you were "upstat" or "downstat". The awards given to people who were upstat were things they liked to do such as going to the movies, and the penalty would be not being allowed to go to the movies.

- 16. The disciplinary system that was in place the longest was "Class A, B and C" and "Red, Blue and Gold". "Class A, B, and C" was a long-range "class" based on responsibility and statistics, "Class A" being the highest and "Class C" being the lowest. "Class A's" had a few special privileges such as being allowed to eat sugar if they wanted to (this was prohibited for the rest of the cadets during the week and was only allowed on Friday night and Saturday as the kids could get hyperactive).
- 17. "Red, Blue and Gold" was a week-by-week system with "Gold" being the best and "Red" being the worst. It was based on how well you did in school and on your work, as well as specific hygiene and manners points that week. If you were "Gold" there was a party on Friday night with a movie and treats and you could spend Saturday as you liked. On Saturday you could be wherever you wanted at the School and adjacent housing area, or you could leave the grounds and go to the nearby mall, or movie theater as long as you went with someone. (By being "Gold", you were considered responsible

and having a "buddy" was simply for safety reasons.) If you were "Blue" you were also off on Saturday, but you were not allowed to leave the QI unless your parents were with you. If you were "Red" you did chores on Saturday afternoon, unless your parents were off and then of course you would go with them for the day. Some times there were special outings for the people who were "Blue" and "Gold".

- 18. At one time there was a story going around about a room with plywood on the walls and that it was supposed to be a disciplinary space where people would be locked up. But I believe that it was simply that, a story. There was a room with plywood on the walls but it was used as a storage room and at one point a tool shed. I never heard anyone in the room and never heard of anyone being put in there.
- 19. Most of the dorms were fairly nice. Children were encouraged to use hygiene and did courses on hygiene such as "How to Make a Bed" and "How to Fold your Clothes". There was a "Children's Cleaning Course" for the younger children and more in-depth courses for the older children on hygiene and "Your Body". Bugs were not allowed to infest the rooms and if any bugs were found, it was handled immediately. I would visit Zoe in her room many times and observed her room to also be clean and un-infested.
- 20. In the three years I lived in a dorm, I think I moved twice. There were not that many switches that I can recall, unless the person wanted to move and live with people they were more friendly with, etc. There was no preferential treatment as to who

got what dorm or what dorm was nicest based on the positions the cadet's parents had.

The cadets who kept their rooms nice and neat had the nicest rooms.

- 21. We were taken a lot of places while I was a cadet. Every other week or so, we were taken to the Largo Library and spent several hours there. We were allowed to read whatever books we wanted and if you did not have a library card, the supervisor would often check them out for you. By the library was a playground where we would play as well.
- 22. We would also be taken to a very nice park which is one of the stops on the Pinellas Trail. You could bring your bike, roller blades, roller skates, skateboard, etc. and go with one adult on the trail, or stay with one of the other adults at the park where there was a nice playground and a lake where you could take nice walks. I can specifically remember doing this about ten times.
- 23. There is a nature park called Moccasin Lake which we went to three or four times which is also nearby.
- 24. Another place that we went at least twice was "Old McMickey's Farm" which is an educational farm. These were day trips.
 - 25. We also went to a museum in Tampa.
- 26. Several times we went to Ruth Eckerd Hall for performances. One that I particularly remember was a performance done by some fascinating acrobats.
 - 27. There were several trips to Washington, D.C. and to the Rocky Mountains,

as well as many camping trips.

- 28. At one time (in 1994, I believe) we had a swim team. We would swim at the School, but the pool is not really big enough for that, so we also joined a local swim team at the Long Center. We would go there three times a week and were part of a swimming class there.
- 29. At one time we also had a sailing school. There were several gradients up to the point where you could sail and take care of a four-person boat. Eight or ten people at a time did this.
- 30. There were plenty of places to play at the School. There was a jungle gym, two basketball courts, a volleyball court, swings, monkey bars and a swimming pool. There was also equipment so you could put up soccer goals and play soccer. There was one section where there were lines painted on the ground for several games such as "four-square" and hopscotch so people could play those games too. A small running track was also painted on the ground for people to run races. The Volleyball court also had lines painted so that it could be used for "Crossfire". There were also at least three "tether ball" places set up. At one time we also had a large trampoline outside and gymnastics mats in a large recreation room that people would use to play on. There was also a TV and VCR set up in the recreation room. We were not supposed to play in our rooms as it would be impossible for the adults to supervise us there.
 - 31. There was always medical care available for the cadets. When I first

arrived from England I did not have any immunization shots. As it is the law that you must get them, I did. Later two or three people came out to the School and administered the needed "booster shots" for all of the cadets who needed them.

- 32. I personally never got severely sick or injured, but I have no doubt that I would have been well taken care of if I had.
- 33. There were always lots of vitamins at the QI for those who wanted them and basic first aid materials.

SARAH HELLER

STATE OF FLORIDA COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me this day of February 2001, by Sarah Heller, who is personally known to me OR produced as identification.

A. BAXTER

MY COMMISSION # CC 830212

EXPIRES: Apr 26, 2003

Notary Distribution Fix Notery Service a Bonding Co.

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