

AFFIDAVIT OF EDWARD WALTERS

I, Edward Walters, hereby depose and state under pains and penalties of perjury:

1. I have personal knowledge of the facts sworn to herein and if called as a witness to testify thereto could do so of my own personal knowledge.

2. I was a member of the Church of Scientology for approximately nine (9) years from 1970 through March of 1979.

3. My position in the Church of Scientology was that of Case Supervisor, a Class VII Auditor and I was generally considered one of the highest "tech" people, knowledgeable about Scientology policy in the U.S., I was also directly responsible for the handling of pre-clear folders.

4. While a member of the Church of Scientology, I had frequent contact with Susan Reed, the Assistant Guardian, Matty Reese, the Assistant Guardian Public Relations Officer, and Chuck Reese, Assistant Guardian of Intelligence. Susan Reed often told me to be aware of "evil" and "suppressive" groups and organizations which were out to stop Scientology. She said "evil groups

were as I remember, the United States Government, the American Medical Association, the Better Business Bureau, doctors, lawyers, and police agencies of any kind. She stated that the Guardian's Office was responsible for stopping these attacks against Scientology by any means available including electronic surveillance, infiltration, burglary and theft. The above named Guardian's Office personnel would tell me of the "wins" that they would have in their covert operations to stop or destroy those groups or individuals whom they considered to be suppressive. At this time Susan Reed introduced me to a fellow in her office and who told me his name was Randy. Randy said he was an intelligence agent working directly under Mary Sue and L. Ron Hubbard, and that he worked on the most sensitive and most secret of all Scientology's covert operations. He also stated that there was a need to do away with "suppressives" and groups attacking Scientology in whatever way necessary, including burglary, larceny, and "framing". He informed me how the Guardian's Office technology worked. For instance, he said that the Guardian's Office would plant dope on some "SP", then call the police and have the fellow arrested. The Guardian's Office would circulate word of the fellow's arrest and whatever the fellow said about Scientology would not be believed. It was in this

way that they framed some of the SP's. He then told me that if Susan Reed wanted me to contact him that I should call the Los Angeles Guardian's Office and ask for either "Randy", "Bruce", "Raymond" or "Bruce Raymond". He then told me I was not to reveal what he had told me or who he was to anyone and that grave consequences could result to me if I divulged any of this.

5. On several occasions I overheard phone conversations between the above named individuals and people in the United States Guardian's Office in Los Angeles with respect to illegal acts and covert operations requested to be done by the United States Guardian's Office in Los Angeles.

6. I know from my own personal experience that the Guardian's Office of each local Org is controlled by and reports to the United States Guardian's Office in Los Angeles. The United States Guardian's Office in Los Angeles is operated by the Church of Scientology of California and is controlled by Mary Sue Hubbard and L. Ron Hubbard. I also know that there is a direct telex connection between the United States Guardian's Office and the Clearwater headquarters of the Church of Scientology and that this telex connection is used by the United States Guardian's Office to consult with Mary Sue and

L. Ron Hubbard, of Clearwater, Florida. The United States Guardian's Office in Los Angeles consults on a periodic basis with officials in Clearwater, Florida but would always consult with them in matters of special importance to the Church of Scientology.

7. I know from my experience and observation that the Guardian's Office has systematically, through the years, used "pre-clear" data as a tool against a pre-clear who would threaten to go to authorities or see a lawyer to sue or get his money back. I observed Matty and Chuck Reese of the Las Vegas Guardian's Office do this for many years and at times, they had told me how "we stopped" or "we showed that lawyer what a client he really has and he backed off right away", etc.

8. While Case Supervisor in 1978 at the Celebrity Center Mission in Las Vegas, Bruce Hamilton of the Las Vegas Guardian's Office came to see me and asked me to go through my PC files and to provide him with any information which had been disclosed in auditing sessions which I thought would be helpful to control the person and would be "helpful to his cause". When I disagreed with these "gestapo type tactics" he told me that these orders came "directly from Los Angeles" or "this comes directly from Clearwater", and that if I didn't comply, it would be "treason".

9. On a number of occasions I had been requested by individuals in Clearwater, Florida to forward pre-clear folders to them or people who were undertaking auditing. In accordance with these requests I have sent a number of pre-clear folders to the Clearwater headquarters and have received written receipts for them. I have a number of these receipts in my custody at this time.

10. I was a member of the Las Vegas Org throughout the period that La Venda Van Schaick was a member of the Church of Scientology in Las Vegas. I have personal knowledge of the solicitation techniques used on new members ("raw meat"). I have personal knowledge of the "Church" policy throughout the period 1971-1979 both in

Las Vegas and throughout the U.S. with regard to the Church's "religious front" and with regard to the making of representations to raw meat to induce them to pay money or to join the organization. In Las Vegas and throughout the U.S. it was "Church policy" between 1971-1979 to state to everyone that the Church of Scientology was a law-abiding organization that operated only on scientific principles based on scientific validation of thousands of case studies over a period of 30 years by L. Ron Hubbard, a nuclear physicist, a combat veteran,

who healed war wounds with Dianetics. The scientific basis of Scientology, per policy, was held out to be more scientific than physics, etc. The representations made to people such as La Venda Van Schaick were made orally, in writing in small advertising flyers such as "What is Scientology" and through the sale of books and publications such as "Dianetics, The Modern Science of Mental Health". I was trained and others in the Org, called "body-routers" and "registrars" were trained to tell people that Scientology was a "science", not a "religion" and that "Religion" was only used to deal with the Government, taxes etc.

11. It was common knowledge in the "Church" and it was "Church Policy" to use the "religious front" to deal with the Government, but to solicit new recruits and train members based on "scientific technology" devoid of religious significance or context. Representations made to induce people like La Venda Van Schaick to pay money and become members were uniformly made, per policy, in the context of "scientifically guaranteeing" them higher I.Q., cure of psychosomatic disease, increased educational and career opportunities, working with Hubbard, earning a salary, receiving courses and training, room and board, health care, etc. It was

"Church policy" not to inject "religion" into the foregoing representations. It was common knowledge to everyone in Scientology that I dealt with between 1971-1979 in Las Vegas including Barbara Glass and Robert Harvey, that (1) religion was used as a "front"; (2) that courses and books were sold to "make money" based on specific promises or guarantees which had no religious context; and (3) that elaborate plans were used to create the impression with the Government that Scientology was a religion pursuant to a policy called "The Minister's Mock-Up", based on the "religious image check sheet". This policy required someone in the Church to wear a "minister's costume" whenever the Church dealt with the Government. Between 1971-1979, I know of three instances where this was done:

once when someone from the D.A.'s office came to the Org, once when a newspaper reporter came to the Org, and once when a magazine was preparing an article.

12. It is written "Church policy" to use the religious front for the Courts, the Government, lawyers, accountants, etc. In fact, the very effort presently made by Scientology lawyers in the Courts throughout the U.S. is based on Hubbard "tech" to present Scientology as a "religion". This is 180° opposite to what in reality happens in the Org when Scientology is being "sold". If

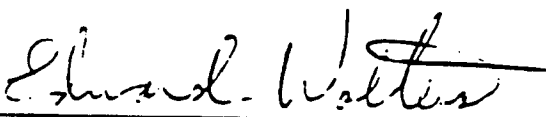
we tried to sell Scientology as a "religion" on the street or to members for more courses, we would have been laughed out of town, and wouldn't have received a nickel. There is no religious context to the sale of Scientology courses and books. After the F.D.A decision in the early 1970's, we were told to start putting "stickers" in the books which had something to do with a "religious disclaimer". However, it was Church policy to tell everyone that the "stickers" were just for the Government and didn't change anything. Scientology "tech" was an exact science, to be sold as such and not as a "religion".

13. The Church of Scientology of California ~~currently controls the responsibility for the~~ U.S. primarily through the Guardian's Office. All directors of the corporations must resign in advance, and all policies issued by California must be rigorously adhered to, including but not limited to the policy of using religion as a front, but soliciting people and money based on the scientific basis and principles of the organization.

14. The Church of Scientology has a very specific and deceptive policy of obtaining signatures on various forms, waivers, releases, etc. Often these forms are

signed just before or after auditing sessions, and the individual is told that it is just for the Government, or the individual does not even know what he is signing, or numerous documents are placed in front of an individual and signed without being read. This was a common practice.

Signed under the pains and penalties of perjury
this 22nd day of July, 1982.


Edward Walters