



1 the highest levels of Scientology management exercise over every  
2 aspect of Scientology and Scientology-related organizations,  
3 whether "church" or "secular," and the ruthlessness with which  
4 any sign of disloyalty or disaffection is handled. This control  
5 extends without any question to the attorneys and all other staff  
6 who are part of Bowles & Moxon.

7       5. The law firm of Bowles & Moxon is actually the in-house  
8 attorney unit of the Church of Scientology and it is utterly  
9 controlled by the Scientology hierarchy, headed by David  
10 Miscavige, the managing agent of the Church of Scientology.  
11 Neither Moxon nor Bowles takes any action whatsoever that is not  
12 ordered or approved by the church command line, which is via the  
13 Religious Technology Center (hereinafter "RTC") and "OSA" to the  
14 in-house attorney unit. RTC is the current command unit for all  
15 of Scientology.

16       6. When David Miscavige took over full control of the  
17 Guardian Office (hereinafter "GO"), he also took over control of  
18 all the attorneys who had been hired by the GO's Legal Department  
19 to carry out Hubbard's policy of using the courts to harass and  
20 intimidate Scientology's critics.

21       7. At that time none of the church attorneys were  
22 Scientologists, and Miscavige found it extremely irritating to  
23 have to deal with people who were not under his complete control.

24       8. It was after Judge Paul Breckenridge's scathing  
25 indictment of Hubbard and Scientology in his decision in the 1984  
26 Gerry Armstrong case and Justice Latey's equally disastrous  
27 decision in a child custody case in England that Miscavige  
28 decided to create the in-house attorney unit, now known to the

1 outside world as the law firm of Bowles & Moxon.

2 9. Miscavige created this unit pursuant to a February 18,  
3 1966 policy letter entitled Attacks on Scientology (Continued),  
4 in which Hubbard stated the following:

5 [One of the actions that has not been  
6 effective in handling attacks on Scientology  
7 has been] "Hiring expensive outside  
8 professional firms. . . .

9 [One of the actions that has been  
10 positive in stopping these attacks has been]  
11 "Having our own professional firmly on staff  
12 (but not halfway on staff). . . .

13 "In the first group [of actions] you can  
14 see large possible outlays to professional  
15 firms, attorneys, accountants. This is money  
16 utterly wasted. They flop and we have to do  
17 it all ourselves anyway."

18 10. Rick Moxon was a long-term Scientologist and GO staff  
19 member. He had been the Assistant Guardian for Legal Affairs in  
20 Washington, D.C., for many years (indeed, he was named as an  
21 unindicted co-conspirator when Hubbard's wife Mary Sue and 11 GO  
22 staff members were <sup>indicted</sup> ~~convicted~~ for theft of government documents in  
23 1978). He took a break from his staff duties to go to law  
24 school, which he attended specifically so that he could become an  
25 attorney for the church. When he passed the bar he became the  
26 first of a new breed: an attorney totally dedicated to the  
27 Scientology doctrine of using the courts to harass Scientology's  
28 enemies.

1        11. He was then transferred to the in-house attorney unit,  
2 which is part of "OSA" US. Tim Bowles, another dedicated  
3 Scientologist, was recruited to close his law practice in  
4 Portland and became an in-house attorney for "OSA".

5        12. When the in-house attorney unit was first formed it was  
6 just Moxon and Bowles, and the legal staff of OSA US provided  
7 their administrative assistance. The in-house attorney unit  
8 offices are right above the OSA US offices in the big blue  
9 building at Sunset and Berendo. OSA US is on the third floor,  
10 and the in-house attorney unit is on the fourth floor. The  
11 official address given for Bowles and Moxon is nothing more than  
12 a mail drop and a front so that people will not know that their  
13 offices are really in the big blue Scientology building. When I  
14 was in OSA I spent quite a bit of time in the in-house attorney  
15 unit.

16        13. Bowles and Moxon were expected to come to OSA staff  
17 musters every day, and they were expected to attend the OSA  
18 weekly staff meetings on Friday night. They submitted purchase  
19 orders to OSA financial planning, and were in every way  
20 considered to be an extension of the OSA legal department.

21        14. Moreover, Bowles and Moxon take their orders from the  
22 RTC/OSA command lines. They do not do anything that is not  
23 approved by their RTC and OSA seniors. They do not handle any  
24 cases that are not related to Scientology.

25        15. David Miscavige has complete authority over every  
26 single action that Bowles and Moxon take. Marty Rathbun runs OSA  
27 and the in-house attorney unit for Miscavige, so Rathbun also has  
28 complete authority over them. If Bowles or Moxon do not do

1 exactly what Miscavige and/or Rathbun tell them to do, they risk  
2 being expelled from Scientology forever. For a Scientologist,  
3 this is a fate worse than death, so Bowles and Moxon do exactly  
4 what they are told to do, regardless of whether it is in keeping  
5 with the rules and regulations of the court. This is why their  
6 behavior appears to be so bizarre at times; they are following  
7 the orders of their seniors Miscavige and Rathbun, neither one of  
8 whom is an attorney and neither one of whom has any respect for  
9 the law. Scientologists believe that the Scientology justice  
10 system is the only valid form of justice and that the U.S. court  
11 system is, as Rathbun put it in a recent declaration, "barbaric."

12 I declare under penalty of perjury under the laws of the  
13 State of California that the foregoing is true and correct.

14 Executed this 8th day of January, 1994 at Corona del Mar,  
15 California.

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18 STACY YOUNG  
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