

DECLARATION OF STACY BROOKS YOUNG

I Stacy Brooks Young declare as follows:

1. I am over the age of 18 years.
2. I have been retained as an expert consultant and expert witness by Dr. Uwe Geertz's counsel in the case captioned Church of Scientology International v. Steven Fishman and Uwe Geertz, #CV-6426-HLH (Tx) currently pending in the United States District Court, Central District of California. The statements herein are of my own personal knowledge or reasonably based upon information and belief, and if called upon as a witness, I can testify competently thereto.
3. This declaration is submitted in support of Defendant Dr. Geertz's opposition to Plaintiff's "Motion to Strike or, in the Alternative, to Seal the Declarations of Robert Vaughn Young and Stacy Young."
4. I have read plaintiff Church of Scientology International's "Motion to Strike or, in the Alternative, to Seal the Declarations of Robert Vaughn Young and Stacy Young," the "Declaration of Heber C. Jentsch in Support of..." this motion, and the "Declaration of Kendrick L. Moxon in Support of..." this motion. I have also reviewed my two declarations of December 10, 1993, and January 4, 1994, which, along with several declarations filed by my husband Robert Vaughn Young, are the subject of this motion. Having reviewed my declarations I wish to state that I can find nothing in either one that should be modified or changed in any way. Everything I stated is true and, in fact, if anything, I downplayed many of the things I stated. Certainly I exaggerated nothing.
5. Attorney for the plaintiff Jonathan Lubell described me as an "embittered apostate" in his motion, and, indeed, calls my declarations "false, scandalous and scurrilous" in an attempt to turn my motives into an issue in my designation as an expert on Scientology. Mr. Moxon falsely quotes me as having said that I had become an expert because it was "more lucrative"; in fact it was Mr. Moxon who stated this, not I. He badgered me repeatedly in deposition to say that I was making money by being an expert consultant, for the specific purpose of later being able to use the quote against me, just as he has now done. Attached hereto as Exhibit A is 28:6,8 of my deposition in Dickerson v Sally Jessy Raphael, et al, Washetaw County Case No. NG-WA-92-007117 NZ. I would point out that it is only

in the Sea Organization of Scientology that people are expected to work for nothing; in the real world it is necessary to make a living.

6. Furthermore, for the record, I would like the Court to know that I was asked by Attorney Graham Berry to assist him as an expert consultant; I did not seek him out. My husband and I thought long and hard about the consequences before we agreed to assist him, knowing full well that we would be subjecting ourselves to the full wrath and the Fair Game policy of the church if we did so.

7. Yet knowing what was in store for me, I still decided to do it, not because I am bitter, or at "war" with the church, or any other of Mr. Jentzsch's or Mr. Moxon's characterizations of me. I decided to do it because I feel the truth needs to come out about how people are being abused and how people's civil rights are being trampled upon within the Church of Scientology, particularly the staff members or those who go to work for the church, as Fishman alleges he did.

8. Few people who are qualified are willing to act as an expert on the subject of Scientology. This is because of the church's well-known policy of Fair Game. Unfortunately, Scientology is not a subject that one can learn by taking a course at the local university. It can only be understood by experiencing it, as I did for 15 years. Mr. Lubell states in his motion that "If there were such a thing as an 'expert' on Scientology scripture, such a designation could only be made by the Church"; yet it is utterly impossible for anyone in the church to tell the truth about what is going on. It means instant declaration as a "Suppressive Person" and expulsion from the church. One can only tell the truth after having made the decision no longer to adhere to the policies of Scientology, which include protecting it at all costs and never uttering a word of criticism.

9. I decided to assist Mr. Berry in this case because I believe it is crucial for outsiders to begin to understand what Scientology really is, what motivates its members, how the leadership views non-Scientologists and critics of Scientology (particularly psychiatrists and psychologists such as Defendant Dr. Uwe Geertz), how Scientologists manipulate the courts for their own ends, and the cold-bloodedness with which people like Steven Fishman are coerced into parting with huge sums of money.

10. The Scientology attorneys claim that I am putting the "religious beliefs" of Scientology on trial. That is nonsense. This is the United States of America; people have the right to believe whatever they want to and I have no desire to convince anyone to stop believing in the Scientology

philosophy. It is the practices of this organization that concern me, not the belief system.

11. Violations of civil and human rights, to say nothing of common decency, are so rampant in this organization that it is extremely difficult for an outsider to comprehend why anyone would remain in such a group. Yet this is precisely why the Scientologists continue to get away with such abuse. Former members have such bizarre, outrageous tales to tell that outsiders find their stories very difficult to believe, and the Scientologists do everything they can to discredit the former members as liars, thieves, and worse. The result is that while declaration after declaration has been filed detailing horror stories of sleep deprivation, starvation, involuntary incarceration, loss of consortium, child abuse, suicide, financial crimes and more, Scientology has successfully convinced many courts that the authors of such statements were nothing more than “embittered apostates,” as they have now described me.

12. The truth is much simpler: I am no longer under the influence of the coercive and manipulative methods of Scientology and I can now see how abusive the practices of this group are. There are many people who are still its spiritual, psychological and emotional captives, and these people are not only being victimized by the Scientology Sea Organization command structure but are also perpetrating abuse on others, including children who cannot speak for themselves. People are being held under guard; people are being interrogated on the E-Meter for the slightest infraction or the slightest hint of disaffection; women are being coerced into aborting their unborn children; parents are being kept from their children for weeks and even months at a time. Scientology registrars are coercing people to part with their life savings; they are convincing people to turn over their credit cards; Scientology leaders are pouring money into the Sea Org coffers while staff in the local organizations live in abject poverty.

13. Mr. Jentsch takes offense at my reference to the dangerous methods of Black Dianetics; yet methods of “reverse processing” are employed as control tactics against Scientology staff members on a regular basis. I have no doubt that he himself has been the target of such methods. Such methods include brutal interrogations in which two or more people gang up on someone (who has been deprived of sleep for days) in a locked room and scream abuses until the person confesses to anything they want him or her to confess to; “overt/withhold” writeups in which the person is forced to continue writing up “crimes,” whether real or imagined, until he or she is allowed to go to sleep; “ethics conditions” in which one is not

“upgraded” to the next condition until one has satisfied the ethics officer or senior that one has “fully confronted” one’s criminality; group “musters” at which staff members are publicly condemned for their “crimes,” denounced to their peers and ordered to jump into a freezing lake as punishment.

14. Mr. Jentzsch states that both my husband and I have been on the Rehabilitation Project Force, or RPF. This is very true, and it is where the most horrifying of the abuses takes place, out of sight of anyone else, where staff members are Fair Game for whatever punishment or coercive tactics those in control of Scientology think should be meted out to them. There is no recourse; there is no way off the RPF except to finish the program, and the product of the program is a person who will be utterly, uncritically compliant with his or her seniors without question. Until that is achieved the person is not a “product” and must remain on the RPF. I know that this is true. I experienced it, and so did my husband. So have many other people who have already spoken out about these abuses. There are also many, many others who would speak out except that they are afraid of what the Scientologists will do to them for telling the world what is really going on.

15. I note that there are many things I stated in my declarations which have not been challenged by either Mr. Moxon or Mr. Jentzsch in their declarations. This is because what I have said is true, and they would be perjuring themselves to call me a liar. They malign my character; they call me many names; but they dispute very little of the facts contained in my declarations.

16. Reference is made to what Mr. Jentzsch and Mr. Moxon say in their respective declarations. They are telling what are known in Scientology policy as “acceptable truths,” and Mr. Jentzsch and Mr. Moxon are both veterans of this tactic. So am I; I used to write much of the material that was used to discredit people. Mr. Moxon even used to have me review his letters and pleadings to make sure they were worded well enough. Attached hereto as Exhibit B is a cover note that I attached to a letter ... Accordingly, I am very familiar with the process by which these two men’s declarations were written. Furthermore, I doubt Mr. Jentzsch wrote his own declaration; I used to have to ghost write his material because his Scientology seniors did not think he was a good enough writer to do his own work). Whoever wrote Mr. Jentzsch’s declaration would have been intently searching through my declarations, looking for statements that could easily be discredited. Obviously they were not able to find very many, based on what they have written.

17. Mr. Jentzsch provides a good example of a Scientology tactic, which is to divert attention off the actual point. I stated in my January 4 declaration that what I found most shocking about Steven Fishman's treatment by Scientology was that he was sold E-Meters even though he could never qualify for auditing. Mr. Jentzsch never explains why someone who would never be eligible for training or processing would have been sold E-Meters. Instead, he skirts the issue, saying that "the various uses of E-meters by Scientology ministers is hardly relevant to this Court"; yet in fact the uses of the E-Meter are relevant in the extreme. I repeat what I stated in my earlier declaration: only people who are eligible for auditor training or solo auditing – indeed, only people who are ministers or ministers-in-training – are supposed to be sold E-Meters. Fishman was eligible for neither; he should never have been sold an E-Meter.

18. Mr. Jentzsch then mischaracterizes what I wrote in paragraph 62 of my January 4 declaration. I never said, as he claims, that Fishman was driven mad by reading Scientology materials. On the contrary, I stated, "There is little doubt that Fishman used his E-Meters to 'audit' himself, an action that could easily drive him into a psychotic break." Self auditing is known in Scientology as the sign of a borderline psychotic. To sell someone with a known psychiatric history an E-Meter so that they can self-audit is tantamount to driving them into a psychotic break. Any technically trained Scientologist can confirm this (although no one who is still inside would be allowed to do so).

19. Mr. Jentzsch states that the plaintiff "can produce 1,500 staff members of plaintiff who are more competent than the Youngs and could testify that they are wrong...." Of course all 1,500 staff members of CSI will testify that I am wrong. If they are ordered to do so, they have no choice. It doesn't matter what they personally believe; if they do otherwise than denounce me for what I am revealing about Scientology, they will be declared Suppressive and expelled. Indeed, it has been my experience that the current Scientology leaders will stop at nothing to protect Scientology from anyone they perceive as a threat.

20. I am still recovering from my experience in Scientology. I am still learning about how groups like Scientology use coercive methods to control people like myself, my husband and many other individuals who are still under its spell. I believe that all Scientologists, even the current leadership, are the victims of Hubbard's version of mind control, just as I was. These people, including the Scientology attorneys and paralegals who deal with the courts, have no idea how much they are under the coercive

influence of Scientology and its leaders. They are utterly fanatical about their dedication, and determined to protect Scientology from “enemies” like my husband and me.

21. I have no wish to turn this litigation into a personal “war” with Scientology, as Mr. Jentzsch suggests. It is Scientology, by its refusal to admit the truth of its actions, that invariably turns any litigation into a war.

22. There have been a number of people before me who have publicly told the truth about Scientology, and nearly every one of them has been threatened, frightened, coerced or bought off into silence. I have spoken to many of these people, and many others who are too frightened to come forward publicly, and I can assure you that the information I have been providing to this Court can be corroborated by many other former Scientologists. These people are not “embittered apostates.” They are decent human beings who regret having wasted years of their lives in an organization which they now realize was coercive and destructive of their civil and human rights. They have friends who are still captive, as do I. They want to do whatever they can to help those who are still in this group, as do I. I feel it is my duty to provide the truth to the Court as long as the Court will allow me to do so.

23. I also feel it is imperative upon the Court to listen to what I and others like me have to say. There are citizens of the United States, right now, whose civil rights are being trampled upon and who have no recourse to the laws of this country. This is happening right in Los Angeles and many other cities. There is a compound (called “the base” or “Int”) near Hemet, California, in Riverside County, where armed security guards keep watch on the staff members to make sure they do not leave the compound. If these people violate the Scientology rules they risk being refused food and shelter. Others are being involuntarily imprisoned. The women at this compound are not allowed to get pregnant and if they do, they are coerced into getting abortions at the Riverside Planned Parenthood Clinic. Church funds are being spent to build exercise rooms and sports fields for the exclusive use of celebrities like Tom Cruise and Nicole Kidman, using slave labor from the RPF at \$5.00 a week. These laborers are kept up for days at a time at the whim of Scientology leaders. Children are being kept at camps, away from their parents for weeks at a time. Parents who ask to see their children more than this are frowned upon; children are considered “distractions” to production. Mr. Jentzsch knows this: he and his wife Karen were coerced by David Miscavige into being divorced because Karen wanted Heber to spend more time with their son, Alexander. Miscavige viewed Alexander as a distraction to Heber’s production.

24. My declarations have nothing to do with religious beliefs. They have to do with serious violations of civil rights of U.S. citizens. Surely this is information the Court needs. Surely this is relevant to this litigation, in which Scientology is running roughshod over the civil rights of Dr. Geertz and Mr. Fishman for having dared to expose Scientology for what it is. This is not the view of an embittered apostate; this is the view of a citizen of this country who feels that all Americans have the right to life, liberty and the pursuit of happiness, no matter what their religious beliefs. If the Court silences voices like mine, there will be no one to speak for the people who are being victimized and destroyed by this group, people like Fishman and Dr. Geertz whose only crime has been to tell the truth to the best of their knowledge.

25. The information I have provided should not be stricken nor should it be sealed; the public has a right to know what this group is doing to its members, and to those it perceives as "enemies." It all relates to CSI instructions to commit murder, instructions to commit suicide, and participation in financial frauds and stock scams.

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

Executed in Corona del Mar, California, this 21 day of February, 1994.

Stacy Brooks Young