

DECLARATION OF ROBERT VAUGHN YOUNG

I, ROBERT VAUGHN YOUNG, declare as follows:

1. I was a member of the Church of Scientology for twenty years from 1969 to 1989. For fifteen of those twenty years, I lived communally in the Church's organization. During my twenty years with the Church, I acquired extensive information and training in the methods of Scientology. I have worked directly with every phase and aspect of Scientology from introductory levels to the highest management echelons.

2. The matters set forth herein are of my own personal knowledge and I could and would competently testify thereto. In my various capacities, I have had occasion to work directly with Scientology organizations and staff members in at least a dozen countries. Material that I produced was used in every Scientology organization at one time. I know the Scientology corporate structures and how they interlock. I am also familiar with the "secular" side of Scientology, groups that appear to be outside of the Church of Scientology but which are operated by the Scientology hierarchy. I have also completed what the Church considers to be one of its most confidential levels of personal counseling.

3. In 1968, I began studying Scientology while working in the Ph.D. program at the University of California, Davis. I even used Scientology books in the philosophy courses that I was teaching. In 1969, I left the Ph.D. program to help start the Dianetics and Scientology Mission of Davis. My functions at the

1 Dianetics and Scientology Mission of Davis included giving
2 introductory lectures, supervising the communications course,
3 giving professional Dianetic auditing and handling of public
4 relations for the Mission.

5 4. In early 1971, I joined the Guardian's Office of the
6 Church of Scientology, San Francisco. This organization is
7 presently titled the "Office of Special Affairs" or "OSA". The
8 Guardian's Office was that part of Scientology which dealt with
9 external matters such as media, lawsuits and government.

10 5. Upon joining the Guardian's Office, I was immediately
11 sent to Los Angeles for training in Public Relations (commonly
12 referred to as "PR" within Scientology). During my PR training,
13 I was required to study various official investigations into
14 Scientology. I also studied the press files which were
15 extensive. I was also able to read internal dispatches about
16 these situations and problems with the media.

17 My PR training also included studying confidential material
18 written by Scientology founder L.Ron Hubbard and Guardian Office
19 (GO) personnel on how to handle public relations. This
20 confidential material was viewed only by authorized GO personnel
21 like myself. The material was on defining, identifying and
22 dealing with those viewed as enemies of L.Ron Hubbard and
23 Scientology.

24 In addition, my PR training included "drills" which were
25 exercises to teach me basic PR skills such as how to write press
26 releases, give press conferences, how to respond to reporter's
27 questions, how to divert a reporter, and how to avoid questions.

28 I underwent a "mini-hat" instruction to enable me to

1 temporarily manage other bureaus such as the Intelligence Bureau
2 which ran covert operations.

3 6. I was also trained and briefed from 1971 onwards on
4 Scientology as a religion. At no time in nearly twenty years was
5 the purpose of our image as a church ever designed or executed as
6 anything but a PR, tax or legal ploy. However, there were
7 occasions when Scientology or L. Ron Hubbard had to assume a
8 secular mode and so I was also trained how to also make him and
9 Scientology appear to be secular and how we could easily switch
10 from one mode to the next, depending on the need. I was also
11 trained on special circumstances, such as in Mexico, where we had
12 to pretend to be Dianetics. We often practiced our responses.
13 Thus if the audience were business people, we could promote our
14 or Hubbard's secular side. If we were attacked, we would switch
15 to a religious facade. This strategy came from Hubbard himself
16 and I was privy to it.

17 7. When I completed my PR training, I returned to San
18 Francisco where I assumed the position of Assistant Guardian (AG)
19 and ran all bureaus. She was gone for perhaps four months.
20 While I was serving as the AG, the San Francisco organization
21 encountered a severe financial crisis. With the advice of the
22 Guardian's Office U.S. in Los Angeles, I stepped in, seized the
23 accounts and ran the entire organization until it returned to
24 solvency. This experience taught me the financial structure of
25 Scientology.

26 8. As the AG, I conducted internal investigations into
27 personnel in the organization by reviewing their ethics files,
28 personnel files and auditing folders. I learned how to alter

1 records in the organization to mask the trail of personnel going
2 to the Intelligence Bureau so that they could not be traced back
3 to Scientology. It was standard practice to destroy or alter
4 records so that there was not trace of the persons responsible
5 for covert acts in the event that law enforcement should try to
6 find them.

7 9. As the Public Relations Officer (PRO), I took orders
8 from the Guardian's Office US (Los Angeles) and the Guardian's
9 Office World Wide (in England). I worked with all media in
10 Northern California.

11 10. In late 1973, I was promoted from the San Francisco
12 office to the Guardian's Office U.S. (GOUS) located in Los
13 Angeles where I had previously received my PR training. GOUS's
14 function was to direct and run all Guardian's Offices in the
15 United States as well as Mexico.

16 My first assignment with GOUS was to be the Public Relations
17 Establishment Officer (PR EstO) where I was to work with all
18 personnel in the PR US Bureau. I also handled the budget for the
19 bureau, called the "FP" or "Financial Planning." This was done
20 in liaison with other bureaus. This position allowed me to learn
21 all functions in the PR US Bureau and how the finances for the
22 continental office worked.

23 11. After a few months of serving as the PR EstO, I was
24 assigned to the position of Public Relations Liaison US (PRL US).
25 During this time, I was in charge of the PR section of the most
26 secret and largest program of the Guardian's Office - the "Snow
27 White Program." The "Snow White Program" consisted of several
28 programs written by L. Ron Hubbard and was designed to ferret out

1 the source of international criticism of Scientology. There were
2 people assigned to each bureau to carry out the Snow White
3 program. As the PRL US, I was afforded the opportunity to
4 become familiar with dozens of Scientology organization across
5 the United States.

6 12. While working in the Snow White Program, I was directly
7 responsible for obtaining a number of key acceptances and/or
8 religious recognitions from federal agencies for the Church of
9 Scientology. These came to the Church of Scientology on federal
10 agency letterhead and were addressed to me, giving Scientology
11 some form of acceptances, recognition or permission. These came
12 from various agencies such as the Department of Labor and the
13 Department of State. These letters to me were subsequently used
14 widely by Scientology in the media, in publications and in law
15 suits to show how Scientology had been accepted as a religion.

16 13. During this time, I helped form front groups that were
17 nothing but letterhead such as the National Commission on Law
18 Enforcement & Social Justice. While working in the Snow White
19 Program, I was able to obtain information that the International
20 Criminal Police Organization (Interpol) had a Nazi history. Once
21 this information was disclosed, it enabled Scientology to gain
22 considerable media coverage for years around the world. As a
23 result, I testified twice before Congressional Subcommittees and
24 appeared on radio and television shows. For my success, the
25 Church sent me to England where the Guardian's Office World Wide
26 (GOWW) was located. At GOWW, I was given additional training in
27 PR and learned further how the other bureaus worked, especially
28 in other countries. I was thus given an international

1 perspective in Scientology PR, Finance, Legal and Intelligence.

2 14. In July, 1977, the Federal Bureau of Investigation
3 (FBI) raided Scientology headquarters in Los Angeles and
4 Washington D.C. The Guardian's Office selected me as the
5 national spokesman for Scientology and briefed me as to what to
6 say at the press conferences. The FBI raid resulted in the
7 conviction of L.Ron Hubbard's wife, Mary Sue as well as ten other
8 Guardian's Office personnel.

9 15. Before the trial of Mary Sue Hubbard and the Guardian's
10 Office personnel, I was given access to the documents that the
11 government was going to use at trial. I read and reviewed
12 thousands of highly confidential transmittals including
13 communications with the highest executives in Scientology. In
14 1979, while preparing for that trial, I was sent to Washington
15 D.C. to counter the negative publicity that Scientology was
16 getting with propaganda that was pro-Scientology. I wrote
17 stories which were published in Scientology publications such as
18 "Freedom" magazine.

19 16. After the trial and conviction of the GO personnel, I
20 returned to Los Angeles to head the Specialist Branch at PR US
21 which created Scientology propaganda booklets and publications.
22 It was there that I authored or helped on various articles and
23 books on Scientology.

24 17. About 1978, I joined the Sea Organization ("Sea Org" or
25 "SO") in Los Angeles, where I trained as a Sea Org member. I
26 also know how the Sea Organization, an unincorporated entity, is
27 touted to be a mere fraternal organization, as if it has no
28 power. It is, in truth, the actual infra-structure that I and

1 others used to direct, control and operate Scientology, whether
2 it be "church" or "secular". I lived communally with other Sea
3 Org staff members and therefore am intimately familiar with the
4 Sea Org life style.

5 18. In 1980, I was informed that the secret hiding place of
6 L.Ron Hubbard near Hemet, California was about to be exposed in
7 the media. The location was also the secret international
8 headquarters of Scientology. The Guardian's Office ordered me to
9 take command of the base. With the permission of Mary Sue
10 Hubbard, I converted it to look like a film and tape production
11 studio so that the media would not discover the true nature of
12 the base at Gilman Hot Springs, California.

13 19. In 1981, I was asked to gather information from non-GO
14 archives about L. Ron Hubbard in preparation of his biography.
15 The archives were run by Gerry Armstrong and contained about 25
16 filing cabinets full of Hubbard's personal papers and
17 memorabilia. When Gerry Armstrong disappeared from archives, I
18 was left in charge of Hubbard's private papers and able to read
19 them in great detail.

20 20. In 1982, I joined "Special Project" which was being run
21 by David Miscavige, the current head of the Church of
22 Scientology. Special Project later became "Author's Services ,
23 Inc." (a.k.a. "ASI"). ASI was a for-profit group ostensibly
24 created to serve as Hubbard's literary agency. The actual
25 functions of ASI were three-fold; 1) to run the "All-Clear
26 Mission" which was supposed to get rid of all lawsuits against L.
27 Ron Hubbard; 2) make money for L. Ron Hubbard; and 3) run the
28 Church of Scientology. To the extent that ASI ran the "All-Clear

1 Mission", ASI was running the Guardian's Office/OSA which was
2 responsible for handling the suits.

3 21. Since ASI was the senior Scientology organization,
4 regular and numerous legal strategic meetings with the Office of
5 Special Affairs personnel were held at ASI. I was able to sit in
6 many of these meetings.

7 22. While a public relations executive with ASI, I directed
8 the operations of Hubbard's personal international public
9 relations network which operated in the Church of Scientology.
10 The international head of that network reported directly to me.
11 I held meetings with these staffs on church, as well as ASI
12 property, and directed their training as well as their
13 production.

14 23. While at ASI, I was personally sent to the base at
15 Gilman Hot Springs to handle various situations. This base
16 contained the film and tape production unit known as Golden Era
17 Studios as well as the international management organization that
18 ran all of Scientology, from the church to the "secular" side
19 such as WISE (World Institute of Scientology Enterprises.) I
20 also gave a number of briefings to the entire base. On many
21 occasions, this was on Hubbard's direct orders. I handled
22 personnel and situations at every echelon, from musicians to
23 members of the Watchdog Committee, which was touted as the most
24 senior body in the Church of Scientology. I was thus privy to
25 statistics as well as reports from around the world on the
26 operations of Scientology.

27 24. Because of my position, I have also been privy to the
28 creation and restructuring of corporations within Scientology.

1 Much of this was done at Hubbard's direction. The purpose was
2 usually to mask his or our role in ASI when it came to running
3 Scientology and yet to facilitate the takeover of any group
4 should it run out of control.

5 25. Since the FBI raids in 1977 decimated the Church of
6 Scientology's Intelligence Bureau, ASI became the focal point for
7 "intelligence." In an effort to prevent convictions of Church
8 personnel like those that occurred in 1977 from happening again,
9 it was decided that the more "sensitive" work was to be assigned
10 to attorneys and private investigators and call it "attorney work
11 product." As a result, I am familiar with how the legal and
12 investigative arms of Scientology came to be developed after the
13 Guardian's Office was renamed the Office of Special Affairs.

14 26. When the Church of Scientology sued Gerry Armstrong
15 (the man described above as controlling L. Ron Hubbard's
16 archives) in 1984, I was assigned to research Hubbard's life to
17 refute Armstrong's claims that Hubbard had lied to members of the
18 Church of Scientology. During the Armstrong trial, the Church
19 called me as an expert witness to testify as to what I found in
20 my research on L. Ron Hubbard's life.

21 27. When L. Ron Hubbard died in hiding in 1986, I was one of
22 perhaps ten people selected to go that night to the site of his
23 death to handle the situation. My task was to deal with the
24 media and my effort appeared in a great many news stories.

25 28. After L. Ron Hubbard's death, a power struggle ensued
26 between Pat Broeker and David Miscavige. David Miscavige won and
27 consequently consolidated his position as head of Scientology.
28 Since I was viewed as being aligned with Broeker, I ended up on

1 the "Rehabilitation Project Force" (RPF), which was a hard labor
2 camp operated by the Church of Scientology at Gilman Hot Springs,
3 California. Those sent to the RPF are kept under 24 hour guard
4 until the Church believes that the prisoner is "rehabilitated"
5 i.e. no longer thinking things which are critical of David
6 Miscavige, Hubbard or how Scientology is operated. After 14
7 months on the RPF, I was considered "rehabilitated" and was
8 reassigned to ASI by David Miscavige where I was assigned the
9 task of producing "Ron Mags," a publication initiated by my wife
10 and I in 1982 about L. Ron Hubbard. When I refused to follow an
11 illegal order several months later, I was physically assaulted
12 and beaten by Norman Sharkey, Trustee. When I said I wanted to
13 leave ASI and be assigned to the Office of Special Affairs, I was
14 taken to the base at Gilman Hot Springs, California, for further
15 "handling" by Greg Wilhere, the Inspector General, supposedly the
16 highest ranking position in Scientology. When I did not change
17 my attitude and I asked Wilhere about my status, I was told I was
18 not going to be allowed to leave. Pretending to be better, I was
19 subsequently allowed to visit my wife in Los Angeles. On July 3,
20 1989, after filing a report with church attorney Kendrick Moxon
21 about the beating at ASI, my wife and I fled Los Angeles with a
22 few items of clothing, leaving the rest of our personal
23 belongings behind.

24 29. After about two months of travel, my wife and I finally
25 settled in San Diego, California, to begin our lives over. I
26 subsequently began to write for a number of publications and have
27 won awards from the Society of Professional Journalists and the
28 San Diego Press Club.

1 31. As a longtime Scientologist, staff member and a highly
2 experienced and trained public relations specialist (hereinafter
3 "PR"), I was and am familiar with Sterling Management and the
4 role they play in Scientology which was not unlike the roles I
5 handled as a PR many times.

6 30. After my wife and I fled Scientology, we wanted to
7 simply put it behind us. We wanted no contact with anyone. All
8 we wanted to do was to reconstruct our lives, without the fear
9 that we would be locked in a room and interrogated for days and
10 even beaten to force compliance or - if one will not comply - be
11 dragged off to a gulag and be kept under guard while working at
12 hard labor until we were "rehabilitated." That is the fear that
13 Scientology imposes on its staff and that was the nightmare we
14 wanted to never see again.

15 31. When obtaining writing jobs, I kept my Scientology
16 background hidden because I needed time to recover. I also knew
17 that Scientology executives would monitor us to see how we felt.
18 This is done with private detectives who rummage through your
19 trash, interview neighbors, etc., to see if we were planning to
20 make any publicly critical remarks about Scientology. If they
21 found that I was discussing Scientology with anyone (and this
22 could be for professional, religious or medical reasons), they
23 would institute Fair Game, a doctrine I will discuss shortly.

24 32. After more than three years of this existence, three
25 years of trying to hide my past, I began to come to grips with
26 what happened. I began to read texts that were forbidden
27 Scientologists. (Scientologist cannot exercise their basic
28 constitutional rights and read what they wish, say what they wish

1 and associate with whom they wish.) The first book was Jon
2 Atack's A Piece of Blue Sky. I had never spoken to or met Atack.
3 All I did was read the book. As I did, I realized that I had
4 lived in an artificial world in Scientology and had created
5 another since leaving. I also realized that I had friends back
6 in the organization who were also suffering and that as long as
7 people such as David Miscavige and Norman Starkey and Marty
8 Rathbun and the others were allowed to terrorize and intimidate
9 and harass and then dress in tuxedos like Mafia dons and pretend
10 there was no blood on their hands, the abuse would only grow.

11 33. I also realized that there had never been a person like
12 me to have left Scientology, nor a couple like my wife and me.
13 Between us we had 35 years in the highest echelons. I knew
14 virtually every phase and level of activity. I knew the policies
15 and directives and orders that told us how to lie, deceive,
16 bully, harass and destroy people.

17 34. I knew without a doubt that if we spoke out, they would
18 seek to destroy my wife and me. This is not said lightly. I
19 spent 20 years in those sections of Scientology where the lives
20 of "enemies" - from apostates to journalists to judges - were
21 made targets of destruction. I knew how Miscavige was ready to
22 spend millions to destroy anyone. I have sat in on those
23 conferences as one of his top aides. I heard the screaming
24 profanities as people were ordered to "get" a person at all
25 costs. I also knew that the smiling, cordial attitude given to
26 the courts and the media was a facade that we practiced and how
27 we laughed later how a judge or journalist was fooled. I knew
28 all those schemes and which Hubbard "scriptures" told us to

1 destroy anyone in Scientology's path. That is why I have
2 undertaken additional security measures including briefing local
3 law enforcement as to our situation.

4 35. One of the first results of my decision was a feature
5 article that I wrote for Quill, the publication of the Society of
6 Professional Journalists, titled, "Scientology: From Inside Out."
7 (Exhibit "A") My credentials for being published in a
8 professional journal that has included Pulitzer Prize winners is
9 stated in the article. I wrote it to try to educate the media on
10 how Scientology abuses and misleads them and what they can do
11 about it. I wrote it after reading a piece in Quill published
12 two years earlier by Los Angeles Times writer Robert Welkos who
13 told how he had been the target of Fair Game when writing about
14 Scientology. (Exhibit "B") After reading it, I realized that it
15 was not right that such abuse continue in the media as well as
16 the courts and that it was time to speak out.

17 36. This was not an easy decision. By speaking out,
18 exercising my constitutional right, by being willing to present
19 sworn testimony, I am an "enemy" to Scientology. No
20 Scientologist questions this because Hubbard is senior to the
21 Constitution and to the law. They are willing to abrogate their
22 rights and even their lives to his will. I am no longer willing
23 to do so. I wish to present my sworn statements as to the truth
24 of the organization.

25 37. I have already served as a Scientology expert
26 consultant to attorneys involved with a Scientology case in
27 Michigan (Dickerson v. Sally Jesse Raphael, et al.; Washtenaw
28 County Case Number NG-WA-92-007117 NZ). I am also serving as a

1 Scientology expert in a case where Scientology is suing over a
2 1991 article in Time magazine. (Church of Scientology v. Steven
3 Fishman and Uwe Geertz in US District Court, Central District of
4 California, Case No. 91-642HLH J (Tx).)

5 38. I have been asked to serve as a Scientology expert
6 consultant in the case in which this declaration is filed,
7 Sterling Management v. Cult Awareness Network and have already
8 filed a declaration. My declaration explained why, although the
9 Church of Scientology and Sterling Management are two corporate
10 entities, they are not truly separate. What Scientology presents
11 to the courts and to any legal entity is entirely different from
12 the actual practice conducted each day within Scientology.

13 39. Scientology executives don't want me to testify to a
14 truth that is known and accepted and even applauded within
15 Scientology. The reason is the same as if it were the Mafia: I
16 am telling people outside the secret circle. For that, a person
17 becomes "Fair Game."

18 40. Hubbard's Fair Game doctrine has already come into play
19 in this case. It is directed at me and my family for my
20 willingness to expose it. The following is a documented account
21 of what Fair Game is and how it works.

22 41. Scientology seeks and tries to crush and destroy what
23 it feels are its "enemies." It tries to use the courts to do
24 this. The target can be an apostate, a potential witness, an
25 attorney or even a judge.

26 42. This end-justifies-the-means method of retaliation is
27 called Fair Game, a doctrine that Scientology officials have
28 insisted was cancelled in 1968. This is not true. I was in the

1 movement for over 20 years, from 1968-1989, much of that in
2 echelons that dealt with "enemies" of Scientology and so I know
3 intimately that the practice never stopped and cannot stop. The
4 reason is that it is in the writings of Scientology Founder
5 Lafayette Ronald Hubbard which are now deemed "scripture."
6 Since, according to Scientology policy, no one but Hubbard can
7 cancel or revise his writings ("scriptures"), and since Hubbard
8 died in 1986, his extant writings stand. I will draw from those
9 writings.

10 43. Fair Game is basically the Hubbard doctrine that
11 "enemies" of Scientology can and should be destroyed. It is the
12 product of a man that grew so paranoid that he lived in hiding,
13 under an assumed name and disguise, pretending this lifestyle was
14 part of his "research."

15 44. In 1955, Hubbard laid the groundwork for Fair Game in
16 "The Scientologist: A Manual on the Dissemination of Material."
17 In it he offers two instances when a Scientologist must attack:
18 if arrested and if sued. Hubbard's orders what to do are clear.
19 The following are excerpts from that "scripture":

20 "Cause blue flame to dance on the
21 courthouse roof until everybody has
22 apologized profusely . . .

23 The DEFENSE of anything is UNTENABLE. The
24 only way to defend anything is to ATTACK
25 . . . NEVER BE INTERESTED IN CHARGES. DO,
26 yourself, much MORE CHARGING, and you will
27 WIN."

28 45. On using the law to harass (from the same text): "The

1 purpose of the suit is to harass and discourage rather than to
2 win. The law can be used very easily to harass and enough
3 harassment on somebody who is simply on the thin edge anyway,
4 well knowing that he is not authorized, will generally be
5 sufficient to cause his professional decrease. If possible, of
6 course, ruin him utterly."

7 46. There is also "investigation", Hubbard said in the same
8 document. This is used when you want "somebody haunted." The
9 purpose, he said, was to "crush" the people with what is called a
10 "noisy investigation.":

11 "When we investigate, we do so noisily
12 always. And usually mere investigation
13 stamps out the trouble even when we discover
14 no really pertinent facts. Remember that -
15 by investigation alone we can curb pushes and
16 crush wildcat people and unethical 'Dianetics
17 and Scientology' organizations."

18 In short, Hubbard (who died in hiding) felt that everyone
19 should be as terrified of an investigation as he was.

20 47. A few years later, Hubbard introduced the notion of
21 manufacturing evidence against an enemy. In "Department of
22 Government Affairs" (August 15, 1960) Hubbard wrote,

23 "If we are attacked on some vulnerable point
24 by anyone or anything or any organization,
25 always find or manufacture enough threat
26 against them to cause them to sue for peace.
27 Peace is bought with an exchange of
28 advantage, so make the advantage and then

1 settle. Don't ever defend. Always attack."

2 48. In the same "scripture" he said: "The goal . . . is to
3 bring the government and hostile philosophies or societies into a
4 state of complete compliance with the goals of Scientology. This
5 is done by high level ability to control and in its absence by
6 low level ability to overwhelm. Introvert such agencies.
7 Control such agencies. Scientology is the only game on Earth
8 where everybody wins. There is no overt in bringing good order."

9 49. An "overt" in Scientology is a transgression, a wrong,
10 an unethical act. What Hubbard is saying is that no crime can be
11 committed as long as one's actions are "bringing good order."
12 This is what permits Fair Game in Scientology, that the non-
13 Hubbard laws can be broken when pursuing "enemies."

14 50. The doctrine of Fair Game was codified on March 7,
15 1965, when Hubbard issued "Suppressive Acts: Suppression of
16 Scientology and Scientologists: The Fair Game Law". Hubbard
17 wrote:

18 "By FAIR GAME is meant, without rights for
19 self, possessions or position, and no
20 Scientologist may be brought before a
21 Committee of Evidence or punished for any
22 action taken against a Suppressive Person or
23 Group during the period that person or group
24 is 'fair game'." (A revision of December 23,
25 1965 changed it to read, "By FAIR GAME is
26 meant, may not be further protected by the
27 codes and disciplines of Scientology or the
28 rights of a Scientologist.")

1 As to what was a "suppressive person" Hubbard gave the
2 definition:

3 "A SUPPRESSIVE PERSON or GROUP is one
4 that actively seeks to suppress or damage
5 Scientology or a Scientologist by Suppressive
6 Acts."

7 "SUPPRESSIVE ACTS are calculated to
8 impede or destroy Scientology or a
9 Scientologist and which are listed at length
10 in this policy letter."

11 Some of the suppressive acts listed included "public
12 disavowal of Scientology"; "public statements against
13 Scientology"; asking for a refund of fees paid; and "writing
14 anti-Scientology letters to the press." Even turning a
15 Scientologist into the proper authorities can gain one the label
16 of a suppressive. The issue also prohibits "1st degree murder,
17 arson, disintegration of persons or belongings not guilty of
18 suppressive acts." (emphasis added)

19 51. A few months later, Hubbard gave specific orders on how
20 to apply the Fair Game doctrine in HCO Executive letter 27
21 September 1965 on "Amprinistics". This was what he called a
22 "splinter" group, a group that was using Scientology methods
23 without his control. Hubbard's three-page issue blasts the
24 Amprinistics leaders with a variety of sexual charges (one of his
25 favorite topics for accusations) and says what should be done:

26 "They are each fair game, can be sued or
27 harassed [sic]. Horner can be barred out of
28 any Commonwealth Country or England as he was

1 the subject of a deportation order from
2 England and his file has come alive again in
3 the Home Secretary's Office. Harry
4 Thompson's wives and victims are always
5 looking for him to have him arrested. Watson
6 is a set up for arrest as a homosexual. Any
7 meeting held by them should be torn up. The
8 names of any persons attended should be
9 collected and they should be labelled SP
10 [suppressive person] as they have left
11 Scientology. . . . If these persons move
12 into your area act through any agency you can
13 to have them deported or arrested on whatever
14 grounds. . . . Horner's UK deportation
15 order, Thompson's police record and Watson's
16 homosexuality make them very vulnerable to
17 deportation or arrest."

18 Hubbard does not stop there. He goes on to issue a five-
19 step order that includes:

20 "(2) Harass these persons in any possible way

21

22 (4) Tear up any meeting held and get the
23 names of those attending and issue SP orders
24 on them and you'll have lost a lot of rats."

25 This order is one of the clearest examples of Hubbard's Fair
26 Game doctrine. What he wrote has never been cancelled and thus
27 is still "scripture."

28 52. In 1966, Hubbard began to codify those sections of

1 Scientology that would implement Fair Game. For example, on
2 February 17, 1966, he created the Public Investigation Section
3 with a policy letter of that name and date. He said it would
4 serve "the useful functions of an intelligence and propaganda
5 agency. It finds the data and sees that it gets action." The
6 statistic of the unit included "the number of derogatory news
7 stories appearing that week related to enemies of Scientology."

8 53. Hubbard also urged the priority of finding evidence of
9 "murder, assault, destruction, violence, sex and dishonesty, in
10 that order. Investigations which can uncover these factors in
11 the activities of individuals or a group attacking Scientology
12 are valuable in the degree that they contain a number of these
13 factors." And note that Hubbard's use of such evidence is not
14 for law enforcement but to the media. "In that way," he wrote,
15 "we then get rid of suppressive groups by investigation and
16 disclosure."

17 54. On February 25, 1966, Hubbard wrote an "Attacks on
18 Scientology" policy letter, in which he said to "Start feeding
19 lurid, blood sex crime actual evidence on the attackers to the
20 press."

21 55. On October 18, 1967, he issued "Penalties for Lower
22 Conditions", whereby Fair Game was automatically issued on anyone
23 (including staff members) who was an "enemy." They were, he said
24 Fair game. May be deprived of property or injured by any means
25 by any Scientologist without any discipline of the Scientologist.
26 May be tricked, sued or lied to or destroyed." (emphasis added)

27 56. In the late 1960's, Hubbard was having growing public
28 relations problems. One problem was Fair Game. To deal with it,

1 Hubbard wrote an issue that is often cited by the church as
2 evidence that Fair Game was cancelled. But a careful reading
3 will show that nothing has changed but semantics. The issue is
4 "Cancellation of Fair Game" dated 21 October 1968. The entirety
5 of the policy letter (P/L) is as follows:

6 "The practice of declaring people FAIR
7 GAME will cease. FAIR GAME will not appear
8 on any Ethics Order. It causes bad public
9 relations.

10 This P/L does not cancel any policy on
11 the treatment or handling of an SP.

12 [suppressive person]"

13 Notice that Hubbard did not cancel his "scripture" that
14 suppressives could be "tricked, sued or lied to or destroyed."
15 This so-called "cancellation of Fair Game" clearly states that
16 those treatments (or "handlings") were to continue unabated. All
17 that changed was the appearance of two words on a piece of paper.

18 57. As further evidence of Fair Game continuing, four
19 months later Hubbard wrote "Confidential: Targets, Defense" on
20 February 16, 1969, in which he listed "vital targets on which we
21 must invest most of our time . . ." The first and most
22 important: "T1. Depopularizing the enemy to a point of total
23 obliteration."

24 58. On the same day, February 16, 1969, he wrote
25 "Confidential: Battle Tactics", where he urged the use of
26 military tactics and strategy in dealing with the "enemy." He
27 wrote:

28 "A good general expends the maximum of enemy

1 troops and the minimum of his own. He makes
2 the war costly to the enemy, not to himself.
3 One cuts off enemy communications, funds,
4 connections. He deprives the enemy of
5 political advantages, connections and power.
6 He takes over enemy territory. He raids and
7 harasses. All on a thought plane - press,
8 public opinion, governments, etc."

9 59. Hubbard wrote about how to "embarrass, discredit or
10 overthrow or remove an actual or possible opponent" through
11 "covert operations" in "Confidential: Intelligence-Actions:
12 Covert Intelligence: Data Collection: of December 2, 1969.

13 60. In 1977, Hubbard's spy world exploded when the FBI
14 conducted raids on the Intelligence Bureaus of the Guardian
15 Offices in Los Angeles and Washington, D.C. From evidence
16 collected in that raid, 11 top Scientologists went to jail,
17 including Hubbard's wife, Mary Sue. (I was Scientology's
18 national spokesman on the day of the raid and the months that
19 followed.)

20 61. On October 6, 1979, Hubbard's wife Mary Sue and eight
21 other Scientology executives signed a 282 page (plus exhibits)
22 Stipulation of Evidence that stated the government's case. That
23 document details the burglaries, forgeries, conspiracies to
24 obstruct justice and other crimes committed. However, it is the
25 Sentencing Memorandum for Jane Kember (The Guardian) and Mo
26 Budlong (her intelligence chief) of September 16, 1980, by
27 Assistant US Attorney Raymond Banoun that gives the most succinct
28 view of how Fair Game was conducted after 1968. In fact, the

1 memo discloses an admission by defendants that Fair Game
2 continued even beyond the conviction of Mary Sue Hubbard, until
3 mid-1980. (Banoun speculates in the memo "as to whether these
4 illegal activities were ever terminated by defendants.")

5 62. The memo relates how the defendants combined
6 intelligence and legal to defraud and abuse the courts. Portions
7 are hereby excerpted from it.

8 "These crimes included: the infiltration and
9 theft of documents from a number of prominent
10 private, national and world organizations,
11 law firms, newspapers and private citizens;
12 the execution of smear campaigns and baseless
13 lawsuits for the sole purpose of destroying
14 private individuals who had attempted to
15 exercise their First Amendment rights to
16 freedom of expression; the framing of private
17 citizens who had been critical of
18 Scientology, including the forging of
19 documents which led to the indictment of at
20 least one innocent person; and violation of
21 the civil rights of prominent private
22 citizens and public officials."

23 The memo points out how Mary Sue Hubbard had said on the
24 witness stand that she and her co-defendants "felt they could do
25 to others whatever they perceived, however erroneously, others
26 were doing to them."

27 "They presented this Court with a shabby
28 attempt at impeaching Meisner's credibility

1 [the Scientology intelligence agent who
2 turned and started the investigation that led
3 to the raid] by claiming that he stole money
4 from the Church - the same false claim they
5 made against another former Scientologist who
6 had the courage to expose their crimes and
7 thus fell victim to their fair game
8 doctrine." Allard v. Church of Scientology of
9 California, 68 Cal.App.3d 439, 129 Cal.Rptr
10 797 (Ct. App. 1976), cert. denied, 97 S.Ct
11 1101 (1977) - page 14.

12 "The defendants' contentions that they
13 committed the crimes of which they stand
14 convicted in order to protect their Church
15 from Government harassment collapses when one
16 reviews a sample of the remaining documents
17 seized by the FBI during the execution of the
18 two Los Angeles search warrants. If
19 anything, these documents establish beyond
20 question that the defendants, their convicted
21 co-defendants, and their unindicted co-
22 conspirators [which included Ron Hubbard and
23 current Scientology counsel, Kendrick Moxon],
24 as well as their organization, considered
25 themselves above the law. They believed that
26 they had carte blanche to violate the rights
27 of others, frame critics in order to destroy
28 them, burglarize private and public offices

1 and steal documents outlining the strategy of
2 individuals and organizations that the Church
3 had sued. These suits were filed by the
4 Church for the sole purpose of financially
5 bankrupting its critics and in order to
6 create an atmosphere of fear so that critics
7 would shy away from exercising the First
8 Amendment rights secured them by the
9 Constitution. FOOTNOTE: The defendants and
10 their cohorts launched vicious smear
11 campaigns, spreading falsehoods against those
12 they perceived to be enemies of Scientology
13 in order to discredit them and, in some
14 instances, to cause them to lose their
15 employment. Their targets included, among
16 others, the American Medical Association
17 (AMA), which had branded Scientology's
18 practice of "dianetics" as "quackery"; the
19 Better Business Bureau (BBB), which sought to
20 respond to private citizens' inquiries about
21 the courses offered by Scientology;
22 newspapers which merely sought to report the
23 news and inform the public, law firms which
24 represented individuals and organizations
25 against whom Scientology initiated lawsuits
26 (often for the sole purpose of harassment);
27 private citizens who attempted to exercise
28 their First Amendment rights to criticize an

1 organization whose tactics they condemned;
2 and public officials who sought to carry out
3 the duties for which they were elected or
4 appointed in a fair and even-handed manner.
5 To these defendants and their associates,
6 however, anyone who did not agree with them
7 was considered to be an enemy against whom
8 the so-called "fair game doctrine" could be
9 invoked. Allard v. Church of Scientology,
10 supra. That doctrine provides that anyone
11 perceived to be an enemy of Scientology or a
12 "suppressive person" "[m]ay be deprived of
13 property or injured by any means by any
14 Scientologist without any discipline of the
15 Scientology. [He m]ay be tricked, sued or
16 lied to or destroyed." Id., 58 Cal.App.3d at
17 413 n.1, 129 Cal.Rptr at 800 n.1.3 This
18 policy, together with the actions of these
19 defendants who represent the very top
20 leadership of the Church of Scientology,
21 bring into question their claim that their
22 Church prohibited the commission of illegal
23 acts."

24 "It is interesting to note that the
25 Founder of their organization, unindicted co-
26 conspirator L. Ron Hubbard, wrote in his
27 dictionary entitled 'Modern Management
28 Technology Defined' that 'truth is what is

1 true for you,' and 'illegal' is that which is
2 'contrary to statistics or policy' and not
3 pursuant to Scientology's 'approved program.'
4 Thus, with the Founder-Commodore's blessing
5 they would wantonly commit crimes as long as
6 it was in the interest of Scientology."

7 "These defendants rewarded criminal
8 activities that ended in success and rebuked
9 those that failed. The standards of human
10 conduct embodied in such practices represent
11 no less than the absolute perversion of any
12 known ethical value system. In view of this,
13 it defies the imagination that these
14 defendants have the unmitigated audacity to
15 seek to defend their actions in the name of
16 religion."

17 "It is clear from the press releases
18 issued by Scientology following the jury's
19 verdict, and their vicious actions against
20 another member of this Court, that they have
21 yet to learn the errors of their criminal
22 ways."

23 63. The other member of the Court that was being referred
24 to was Federal District Judge Charles Richey who as the target of
25 a sting operation conducted by a private investigator hired by
26 Scientology that forced the judge to recuse himself from the
27 Scientology case he was sitting on. The judge was allegedly set
28 up with a prostitute. The action was clearly Fair Game.

1 Scientology publications however called it a "BIG WIN." He would
2 not be the last judge to be the target of Scientology Fair Game.

3 64. In 1981, a new campaign was undertaken against Gerald
4 Armstrong, a staff member who had fled with some of Hubbard's
5 files. Contrary to what Scientology executives have said, there
6 were Fair Game actions taken against Armstrong after the GO was
7 "disbanded." I know because I sat in on those strategy meetings
8 and was ordered by Hubbard as well as David Miscavige to "get
9 Armstrong." For example, Hubbard created a "reward" poster that
10 would characterize Armstrong as a criminal. I did not comply
11 with the order, for which I was severely berated by Miscavige.)

12 The use of Fair Game on Armstrong was confirmed in 1984 when
13 California Superior Court Judge Paul Breckenridge, Jr., ruled
14 against Scientology with a opinion that included a statement
15 about the civil rights of members and Hubbard:

16 "In addition to violating and abusing its own
17 members' civil rights, the organization over
18 the years with its 'Fair Game' doctrine has
19 harassed and abused those persons not in the
20 Church whom it perceives as enemies. The
21 organization clearly is schizophrenic and
22 paranoid, and this bizarre combination seems
23 to be a reflection of its founder LRH. The
24 evidence portrays a man who has been
25 virtually a pathological liar when it comes
26 to his history, background and achievements.
27 The writings and documents in evidence
28 additionally reflect his egoism, greed,

1 avarice, lust for power and vindictiveness
2 and aggressiveness against persons perceived
3 by him to be disloyal or hostile."

4 65. Another judge who stepped down from a Scientology case
5 was Federal District Judge James M. Ideman. But as he did so, he
6 filed a declaration in his court on June 21, 1993 which said, in
7 part:

8 "Plaintiff has recently begun to harass my former
9 law clerk who assisted me on this case, even
10 though she now lives in another city and has other
11 legal employment. This action, in combination
12 with other misconduct by counsel over the years
13 has caused me to reassess my state of mind with
14 respect to the propriety of my continuing to
15 preside over the matter."

16 Part of the problem, he said, was seeking to have
17 Scientology comply with discovery. They would not comply, he
18 said.

19 Judge Ideman later remarks how Scientology apparently views
20 "litigation as war" and seeks to break the opposition through
21 increased litigations costs. This is not news to members of the
22 Guardian's Office, now known as the Office of Special Affairs.
23 This is part of Fair Game.

24 66. The reason that Fair Game does not stop is because the
25 doctrine stems from policies and directives by Hubbard and they
26 cannot be cancelled or exchanged except by him. Since he died in
27 1986, nothing past that point can be changed. This is also
28 stated in an issue of July 7, 1982, called "The Integrity of

1 Source" which said:

2 "It is hereafter firm Church policy that
3 LRH issues are to be left intact as issued.

4 "No one except LRH may cancel his
5 issues.

6 "No one except LRH can revise his issues
7 whereby changes are incorporated into the
8 text and then reissued. Any valid revisions
9 must hereafter be made in a separate issue
10 stating the change and how the revision is to
11 be read. . .

12 "Already existing issues stand intact
13 and valid."

14 67. On Saturday, October 23, 1993, from 9:00 a.m. until
15 3:30 p.m., my deposition was taken by Kendrick "Rick" Moxon, in
16 Dickerson v. Sally Jesse Raphael, et al. I have known Moxon
17 since about 1973 when he was in the Legal Bureau of the Guardian
18 Office in Washington, D.C. After the 1977 FBI raid, Moxon was
19 named as an unindicted co-conspirator by the Federal Grand Jury
20 that indicted Mary Sue Hubbard and ten others. Moxon is thus a
21 key example of how Scientology executives have lied when they say
22 that anyone involved in the Guardian Office was removed and none
23 remain. Moxon remained in the Guardian Office, even when it
24 underwent the name change to the Office of Special Affairs (OSA).
25 Moxon is still OSA staff and is now the lead in-house attorney
26 for OSA, church of Scientology International. His law firm
27 (Bowles & Moxon) pretends to be an independent law firm when, as
28 it is well-known in OSA and all other senior ranks of

1 Scientology, he and the firm are controlled and operated by OSA
2 and then by OSA's senior, the Religious Technology Center (RTC).

3 68. The stated purpose of the deposition that Moxon took
4 was that I might be called to testify as an expert.

5 69. But not until the last 30 minutes or so of my
6 deposition did Moxon even start to address my position in
7 relation to the case at hand. The time was spent trying to find
8 the names of those I have worked for or associated with since I
9 left Scientology in 1989. I knew the purpose: to initiate the
10 "Fair Game." In 24 hours, I received calls from two former
11 employers who said Eugene Ingram, who was thrown off the Los
12 Angeles Police Department for his association with drugs and
13 prostitutes and turned to being a private detective for
14 Scientology, had been trying to find information about me.

15 70. They are also harassing a woman who I had never met
16 face-to-face. She has nothing to do with Scientology or any
17 case. We had corresponded via a BBS (bulletin board system, a
18 form of E-Mail) perhaps six months earlier and she had asked me
19 to look at material she had written. I agreed and she mailed it
20 to me. I did not respond and instead discarded the material.
21 That Ingram had the material meant that he or someone had taken
22 it from my trash. This is a standard "noisy investigation"
23 technique.)

24 My interest in BBSs was generated by research I had
25 conducted for an article in the May issue of Orange Coast
26 magazine (Exhibit "C").

27 71. As a result of their "fishing" tactics, one week after
28 Moxon took my deposition in Dickerson v. Sally Jesse Raphael, his

1 partner, Timothy Bowles used a portion of the unedited transcript
2 to try to quickly exclude me as an expert witness in an unrelated
3 case (Church of Scientology v. Steven Fishman and Uwe Geertz)
4 with a motion served on Fishman.

5 72. I left Scientology after I was mentally and physically
6 abused to the point of breaking. I had been locked in rooms and
7 assaulted until, like a prisoner of war, I had "confessed" to
8 pre-ordained crimes and ordered to put them into my own
9 handwriting. (The parallel of Scientology interrogation
10 techniques to those of the Communists in obtaining "confessions"
11 is staggering. Like many Communists, the Scientologist may even
12 come to believe that he or she committed the fictional crime.
13 The purposes of these "confessions" - particularly in their own
14 handwriting - is to have material that can be used to blackmail
15 or coerce the person later and thus to keep them in the
16 organization, keep them compliant and to keep them from talking
17 about the crimes being conducted in the name "religion".)

18 73. My wife was abused and was nearly crippled for life.
19 We were physically separated on several occasions for months at a
20 time to try and break our marriage. I had to literally sneak out
21 from my captors to visit her and then sneak back before my
22 absence was known.

23 74. I was physically assaulted by Hubbard Trustee Norman
24 Starkey. I reported the felony in writing to Moxon as a church
25 attorney but he disregarded it. That and other incidents leave
26 no doubt in my mind that the people who still run this
27 organization are capable of continued abuse, harassment and
28 physical assault upon myself and my family. Their use now of a

1 person who was thrown off the LAPD for association with
2 prostitutes and drugs also concerns me.

3 75. The conduct of Moxon in my last deposition, haranguing
4 me for hours, left no doubt what they intend: to use the courts
5 for Fair Game as they have in the past.

6 76. Although I wish to exercise my basic constitutional
7 rights of freedom of speech, freedom of association and freedom
8 of religion, my desire to do so makes me a target of retribution.
9 I am "Fair Game" for merely wanting to walk away. No one walks
10 away from Scientology. In Hubbard's words, he would "rather see
11 you dead."

12 77. Because I know how abusive Scientology executives can
13 become (especially via attorneys and private detectives who are
14 used as cut-outs), I have taken additional security measures to
15 protect myself, my family and my home. This includes briefing
16 neighbors, family friends and law enforcement of our situation
17 and possible tactics and methods and by whom.

18 78. I am not only willing but desirous to testify about the
19 policies, practices and doctrines of Scientology as well as its
20 link to Sterling Management and how Scientology abuses the courts
21 and the law. But to do this fully, I require:

- 22 1. A non-Scientology related location. I am fearful for
23 my personal safety. I was physically assaulted twice
24 in Scientology organization by Scientology executives.
25 I have seen others physically assaulted. I have also
26 been locked up, kept under 24-hour guard, and
27 interrogated for days on end until I broke. I cannot
28 give free testimony at a Scientology location such as

1 at the in-house attorney firm of Bowles & Moxon, nor
2 any group affiliated with the World Institute of
3 Scientology Enterprises.

4 2. No deposition recordings not authorized by the court.

5 Surreptitious records (video as well as audio) are
6 standard Scientology intelligence methods. They were
7 done against federal agencies, federal judges and even
8 private citizens. I have seen these recordings and
9 heard the audio tapes that were secretly made. It is
10 part of "Fair Game."

11 3. No one in the room or nearby but attorneys, and
12 officers of Sterling and/or Cult Awareness Network.

13 Scientology attorneys like to bring in others who have
14 known the deponent plus a private investigator (who was
15 thrown off the Los Angeles Police Department for his
16 link to prostitutes and drugs.) The purpose for
17 bringing them in is intimidation while the attorney
18 conducts the third degree. I am willing to respond to
19 an attorney, not a gallery. Nor do I want any others
20 on the premises, lurking in the halls or a nearby
21 restroom where I can be kidnapped, harassed or beaten
22 as Scientology executives have done and ordered done.

23 4. No harassment. Their cop-turned-criminal has already
24 undertaken the "noisy investigation" on me, per
25 Hubbard's "scriptures." This has included contacting
26 former employers and harassing those they think might
27 know me, sometimes misrepresenting himself as with the
28 LAPD. My trash is also occasionally stolen. And the

1 middle-of-the-night phone calls have started. (This is
2 where the invention of the answering service is
3 appreciated.) I want my family, my friends and my home
4 safe from their Fair Game harassment. They have a
5 right to investigate but not to conduct what Hubbard
6 called "Black Propaganda" where discreditable
7 information is provided people under the guise of an
8 investigation.

9 5. No information from my confidential Scientology files.

10 Scientology touts how various files are "confidential"
11 and "priest/penitent." But under Fair Game, they
12 violate their fiduciary relationships and cull the
13 folders for what might be embarrassing or harassing.
14 Some of this is "laundered" by giving the information
15 to other people who then testify about it. I know how
16 this is done because I saw these tactics used time and
17 again. I also know that Scientology executives deny it
18 is done. This is a lie and they know it. It is simply
19 Fair Game.

20 6. No penetration of attorney work product in unrelated

21 cases. In my last deposition, they sought to learn the
22 names of other Scientology-related cases and attorneys
23 I have been in contact with. They also tried to trick
24 me into lifting the confidentiality of other cases so
25 they could gain information. They also were listing
26 the names of attorneys and cases to see if I had worked
27 for any of them. All of this is Fair Game where they
28 have complete disdain for the legal process.

1 79. I have a right to be an ex-Scientologist and to express
2 my expert opinion and to give sworn testimony without being
3 attacked, harmed, harassed or intimidated by thugs, executives,
4 attorneys or anyone in their hire. And my family and friends
5 have the right, to be free from Hubbard's Fair Game Doctrine.

6 I declare under penalty of perjury that the foregoing is
7 true and correct.

8 Executed this 23^d day of November, 1993, at Orange,
9 California.

10 
11 ROBERT VAUGHN YOUNG
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