

DECLARATION OF ROBERT VAUGHN YOUNG

COPY

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 that 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 Dianetics and Scientology Mission of Davis included giving introductory lectures, supervising the communications course,

1 giving professional Dianetic auditing and handling of public
2 relations for the Mission.

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

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 including those in the United Kingdom, Australia, New
15 Zealand and one that was currently being conducted by the U.S.
16 Food and Drug Administration. I also studied the press files
17 which were extensive, with literally thousands of clippings from
18 around the world. I was also able to read internal dispatches
19 about these situations and problems with the media.

20 My PR training also included studying confidential material
21 written by Scientology founder L.Ron Hubbard and Guardian Office
22 (GO) personnel on how to handle public relations. This
23 confidential material was viewed only by authorized GO personnel
24 like myself. The material was on defining, identifying and
25 dealing with those viewed as enemies of L.Ron Hubbard and
26 Scientology. This material was part of my issued "hat pack"
27 which is a folder of material that explains how to do one's job
28 or "hat". As new material was issued, it was studied and put

1 into the pack.

2 In addition, my PR training included "drills" which were
3 exercises to teach me basic PR skills such as how to write press
4 releases, give press conferences, how to respond to reporter's
5 questions, how to divert a reporter, and how to avoid questions.
6 Use of these drills continue past one's initial training for as
7 long as one is in PR. I also drilled many others.

8 I underwent a "mini-hat" instruction to enable me to
9 temporarily manage other bureaus such as the Intelligence Bureau
10 which ran covert operations.

11 6. I was also trained and briefed from 1971 onwards on
12 Scientology as a religion. At no time in nearly twenty years was
13 the purpose of our image as a church ever designed or executed as
14 anything but a PR, tax or legal ploy. However, there were
15 occasions when Scientology or L. Ron Hubbard has to assume a
16 secular mode and so I was also trained how to also make him and
17 Scientology appear to be secular and how we could easily switch
18 from one mode to the next, depending on the need. I was also
19 trained on special circumstances, such as in Mexico, where we had
20 to pretend to be Dianetics. We often practiced our responses.
21 Thus if the audience were business people, we could promote our
22 or Hubbard's secular side. If we were attacked, we would switch
23 to a religious facade. This strategy came from Hubbard himself
24 and I was privy to it. I was personally able to follow this
25 attitude and strategy from 1971 until I left in 1989.

26 7. When I completed my PR training, I returned to San
27 Francisco where I assumed the position of Assistant Guardian (AG)
28 and ran all bureaus so the then-AG could go to Los Angeles. She

1 was gone for perhaps four months. While serving as the AG, the
2 San Francisco organization encountered a severe financial crisis.
3 With the advice of the Guardian's Office U.S. in Los Angeles, I
4 stepped in, seized the accounts and ran the entire organization
5 until it returned to solvency. This experience taught me the
6 financial structure of Scientology including how money was sent
7 to various bank accounts in San Francisco, Los Angeles, and
8 overseas.

9 8. As the AG, I conducted internal investigations into
10 personnel in the organization by reviewing their ethics files,
11 personnel files and auditing folders. I learned how to alter
12 records in the organization to mask the trail of personnel going
13 to the Intelligence Bureau so that they could not be traced back
14 to Scientology. It was standard practice to destroy or alter
15 records so that there was not trace of the persons responsible
16 for covert acts in the event that law enforcement should try to
17 find them.

18 9. As the Public Relations Officer (PRO), I took orders
19 from the Guardian's Office US (Los Angeles) and the Guardian's
20 Office World Wide (in England). I worked with all media in
21 Northern California. Anytime a story was printed which
22 Scientology considered unfavorable, I would act as the
23 Scientology spokesman for Northern California to refute any such
24 undesirable media.

25 10. While working for the Church of Scientology in San
26 Francisco, I worked with other Dianetics & Scientology Missions
27 which enabled me to learn more about how the Scientology
28 organizations operated.

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

6 My first assignment with GOUS was to be the Public Relations
7 Establishment Officer (PR Esto) where I was to work with all
8 personnel in the PR US Bureau. I also handled the budget for the
9 bureau, called the "FP" or "Financial Planning." This was done
10 in liaison with other bureaus. This position allowed me to learn
11 all functions in the PR US Bureau and how the finances for the
12 continental office worked.

13 12. After a few months of serving as the PR Esto, I was
14 assigned to the position of Public Relations Liaison US (PRL US).
15 During this time, I was in charge of the PR section of the most
16 secret and largest program of the Guardian's Office - the "Snow
17 White Program." The "Snow White Program" consisted of several
18 programs written by L. Ron Hubbard and was designed to ferret out
19 the source of international criticism of Scientology. There were
20 people assigned to each bureau to carry out the Snow White
21 program. As the PRL US, I was afforded the opportunity to
22 become familiar with dozens of Scientology organization across
23 the United States.

24 13. While working in the Snow White Program, I was directly
25 responsible for obtaining a number of key acceptances and/or
26 religious recognitions from federal agencies for the Church of
27 Scientology. These came to the Church of Scientology on federal
28 agency letterhead and were addressed to me, giving Scientology

1 some form of acceptances, recognition or permission. These came
2 from various agencies such as the Department of Labor and the
3 Department of State. These letters to me were subsequently used
4 widely by Scientology in the media, in publications and in law
5 suits to show how Scientology had been accepted as a religion.

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

20 15. In July, 1977, the Federal Bureau of Investigations
21 (FBI) raided Scientology headquarters in Los Angeles and
22 Washington D.C. The Guardian's Office selected me as the
23 national spokesman for Scientology and briefed me as to what to
24 say at the press conferences. The FBI raid resulted in the
25 conviction of L.Ron Hubbard's wife, Mary Sue as well as ten other
26 Guardian's Office personnel.

27 16. Before the trial of Mary Sue Hubbard and the Guardian's
28 Office personnel, I was given access to the documents that the

1 government was going to use at trial. I read and reviewed
2 thousands of highly confidential transmittals including
3 communications with the highest executives in Scientology. In
4 1979, while preparing for that trial, I was sent to Washington
5 D.C. to counter the negative publicity that Scientology was
6 getting with propaganda that was pro-Scientology. I wrote
7 stories which were published in Scientology publications such as
8 "Freedom" magazine.

9 17. After the trial and conviction of the GO personnel, I
10 returned to Los Angeles to head the Specialist Branch at PR US
11 which created Scientology propaganda booklets and publications.
12 It was there that I authored or helped on various articles and
13 books on Scientology.

14 18. About 1978, I joined the Sea Organization ("Sea Org" or
15 "SO") in Los Angeles, where I trained as a Sea Org member. I
16 also know how the Sea Organization, an unincorporated entity, is
17 touted to be a mere fraternal organization, as if it has no
18 power. It is, in truth, the actual infra-structure that I and
19 others used to direct, control and operate Scientology, whether
20 it be "church" or "secular". I lived communally with other Sea
21 Org staff members and therefore am intimately familiar with the
22 Sea Org life style.

23 19. In 1980, I was informed that the secret hiding place of
24 L.Ron Hubbard near Hemet, California was about to be exposed in
25 the media. The location was also the secret international
26 headquarters of Scientology. The Guardian's Office ordered me to
27 take command of the base. With the permission of Mary Sue
28 Hubbard, I converted it to look like a film and tape production

1 studio so that the media would not discover the true nature of
2 the base at Gilman Hot Springs, California.

3 20. In 1981, I was asked to gather information from non-GO
4 archives about L. Ron Hubbard in preparation of his biography.
5 The archives were run by Gerry Armstrong and contained about 25
6 filing cabinets full of Hubbard's personal papers and
7 memorabilia. When Gerry Armstrong disappeared from archives, I
8 was left in charge of Hubbard's private papers and able to read
9 them in great detail.

10 21. In 1982, I joined "Special Project" which was being run
11 by David Miscavige, the current head of the Church of
12 Scientology. Special Project later became "Author's Services ,
13 Inc." (a.k.a. "ASI"). ASI was a for-profit group ostensibly
14 created to serve as Hubbard's literary agency. The actual
15 functions of ASI were three-fold; 1) to run the "All-Clear
16 Mission" which was supposed to get rid of all lawsuits against L.
17 Ron Hubbard; 2) make money for L. Ron Hubbard; and 3) run the
18 Church of Scientology. To the extent that ASI ran the "All-Clear
19 Mission", ASI was running the Guardian's Office/OSA which was
20 responsible for handling the suits.

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

25 23. While a public relations executive with ASI, I directed
26 the operations of Hubbard's personal international public
27 relations network which operated in the Church of Scientology.
28 The international head of that network reported directly to me.

1 I held meetings with these staffs on church, as well as ASI
2 property, and directed their training as well as their
3 production.

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

19 25. Because of my position, I have also been privy to the
20 creation and restructuring of corporations within Scientology.
21 Much of this was done at Hubbard's direction. The purpose was
22 usually to mask his or our role in ASI when it came to running
23 Scientology and yet to facilitate the takeover of any group
24 should it run out of control.

25 26. Since the FBI raids in 1977 decimated the Church of
26 Scientology's Intelligence Bureau, ASI became the focal point for
27 "intelligence." In an effort to prevent convictions of Church
28 personnel like those that occurred in 1977 from happening again,

1 it was decided that the more "sensitive" work was to be assigned
2 to attorneys and private investigators and call it "attorney work
3 product." As a result, I am familiar with how the legal and
4 investigative arms of Scientology came to be developed after the
5 Guardian's Office was renamed the Office of Special Affairs.

6 27. When the Church of Scientology sued Gerry Armstrong
7 (the man described above as controlling L. Ron Hubbard's
8 archives) in 1984, I was assigned to research Hubbard's life to
9 refute Armstrong's claims that Hubbard had lied to members of the
10 Church of Scientology. During the Armstrong trial, the Church
11 called me as an expert witness to testify as to what I found in
12 my research on L. Ron Hubbard's life.

13 28. I held a variety of positions at ASI that ranged from
14 public relations to writing/editing. During that time I became
15 quite familiar with how Hubbard issued orders into church
16 management and how we worked with him to mask this connection. I
17 was also intimately familiar with his personal and public
18 writings, including his fiction, and was even cited in the media
19 as a forthcoming Hubbard biographer. When L. Ron Hubbard died in
20 1986, I was one of perhaps ten people selected to go that night
21 to the site of his death to handle the situation. My task was to
22 deal with the media and my effort appeared in a great many news
23 stories.

24 29. After L. Ron Hubbard's death, a power struggle ensued
25 between Pat Broeker and David Miscavige. David Miscavige won and
26 consequently consolidated his position as head of Scientology.
27 Since I was viewed as being aligned with Broeker, I ended up on
28 the "Rehabilitation Project Force" (RPF), which was a hard labor

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

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

27 31. As a longtime Scientologist, staff member and a highly
28 experienced and trained public relations specialist (hereinafter

1 "PR"), I was and am familiar with Sterling Management and the
2 role they plan in Scientology which was not unlike the roles I
3 handled as a PR many times.

4 32. Scientology could be likened to a coin with two sides:
5 religious and secular. To the Scientologist, however, there are
6 not two sides. There is no difference. But we (in the
7 Guardian's Office/Office of Special Affairs and/or Author
8 Services, Inc.) had to manufacture difference for PR or legal
9 purposes.

10 33. Sterling Management has long been a source of income
11 and new people for the Church of Scientology. Sterling
12 Management is an excellent example of a Scientology organization
13 that is used to disseminate Scientology into areas where the
14 Church of Scientology could not go, namely businesses. We never
15 treated it as anything but a means of covertly putting L. Ron
16 Hubbard and Scientology into an area or organization.

17 34. To a Scientologist, the entire reason for being a
18 Scientologist is to "move up The Bridge." This refers to a
19 series of steps that is supposed to bring about a higher level of
20 awareness. Like every evangelical movement, Scientologists seek
21 to recruit others to their form of personal salvation. That is
22 what "The Bridge" is. However, "The Bridge" can be traveled or
23 done only at the Church of Scientology. Thus, if one is a
24 Scientologist and supporting "The Bridge", then one is moving
25 people ONTO it, as one might escort people to any enterprise.

26 35. In the overall scheme of Scientology as laid out by L.
27 Ron Hubbard, the function of Sterling Management is quite simple:

28 (1) It feeds people to the Church of Scientology.

- 1 (2) It provides jobs to Scientologists who want to raise
2 money so THEY can go up "The Bridge."
3 (3) It provides money to the Scientology hierarchy through
4 licensing agreements and royalties. These agreements
5 are with WISE, the World Institute of Scientology
6 Enterprises.

7 36. WISE promotes itself as an umbrella organization over
8 those that use the technology of L. Ron Hubbard (LRH). However,
9 a review of statements by WISE and the Church of Scientology will
10 show the conflict.

11 37. In a statement from the Church of Scientology
12 International (attached to IRS form 1023), WISE is called a
13 "nonprofit religious corporation" that "was formed to accomplish
14 several objectives with respect to expanding the religion and
15 disseminating secular applications of the technology throughout
16 society." (Exhibit "35", page 60.) However, in WISE's licensing
17 agreement with Sterling Management dated 7 February 1991 (Exhibit
18 "78"), WISE is called a "nonprofit religious fellowship. . ." It
19 says WISE is there to unite businesses and individuals for "broad
20 dissemination" of LRH technology. But there is no mention of
21 "expanding the religion."

22 38. This vital omission is a clear example of what we at PR
23 faced when dealing with WISE and WISE groups such as Sterling
24 Management and how we handled it: we simply told two different
25 stories and hoped that no one would compare notes.

26 39. A closer examination of the WISE licensing agreement
27 with Sterling Management shows that WISE uses "arbiters" to
28 resolve disputes between WISE and any member. However, the

1 requirements of an "arbiter" (Exhibit "2") shows the connection
2 into the Scientology hierarchy, vis "Each arbiter shall be a
3 member in good standing under the Scientology Scriptures, a
4 minister of the Religion of Scientology, a member of the Sea Org,
5 and well versed in the Scientology Scriptures, in particular
6 those Scientology Scriptures pertaining to Scientology ethics and
7 justice."

8 40. First, in my 20+ years in Scientology, I never met a
9 Scientologist who referred to the material of L. Ron Hubbard as
10 "scriptures". This is part of vocabulary that we first concocted
11 and developed in the Guardian's Office so we could appear to be a
12 religion and get our tax exemption from the IRS. It is not a
13 language that is used in Scientology and is even objected to by
14 many Scientologists who resent Hubbard's writings being refereed
15 to as "scriptures." However, in public relations we had to learn
16 to speak this language and dress the part (with turned-around
17 collars) solely to appear as a religion. Away from the TV camera
18 or the courtroom, we laughed at the concept for it was a complete
19 fabrication, a show that we put on for the courts, the media and
20 the IRS.

21 41. Second, the key phrase in the licensing agreement is
22 "Sea Org", short for Sea Organization. The Sea Organization is
23 an unincorporated entity that promotes itself as a "fraternal
24 organization" that has no power. Any experienced Scientologist
25 or staff member knows the truth: the Sea Org is the most powerful
26 entity in Scientology. Being unincorporated, it escapes legal
27 scrutiny. However, every major Scientology organization, is
28 personnel and bank accounts are under the control of Sea org

1 personnel.

2 42. In short, WISE is no more a "fellowship" than the Sea
3 Org because WISE is an extension of the Sea Org and it is the Sea
4 Org that runs all of Scientology. It is the Sea Org that
5 permeates all corporate shells and allows the orders to flow in
6 one direction and the personnel and money to flow in the other.

7 43. This is also shown in the "Command Chart of
8 Scientology" (Exhibit "50".) At the top is the "Watchdog
9 Committee" (hereinafter "WDC"). This is made up of highly
10 dedicated Sea Org personnel. It will be noted that one area is
11 reserved for WISE. This position is called "WDC WISE." Note how
12 there is a connection to another level of WISE beneath it, but
13 there is no connection to the "member" at the bottom. This was
14 done for legal reasons, to avoid showing evidence that orders are
15 given and that money flows. However, it does not take much to
16 see that it is useless to have an entire structure if it does not
17 connect to the member.

18 44. For example, in an undated, copyrighted, 191 WISE
19 newsletter called "WISE WINS" (Exhibit "58"), bar graphs are used
20 to show the "Number of people routed to The Bridge by WISE
21 members." The bar graph accompanies a story about how WISE
22 groups are expanding and cites a number of cases with numbers, on
23 people going "up The Bridge." One group is cited as having
24 "donated over \$8,000,000 to The Bridge!" That means people who
25 came to that WISE group were sent to a Church of Scientology and
26 those people paid \$8,000,000 for counseling, training, books,
27 etc.

28 45. That WISE is a route into the Church of Scientology is

1 also visually shown in WISE promotion. In a large membership
2 package issued in 1990 and sent to Scientologists, there is a
3 "WISE IS. . ." photo essay. The last photo in the series shows a
4 person being escorted into a door labeled "Church of
5 Scientology." (Exhibit "51".)

6 46. It is hardly a secret in Scientology that groups such
7 as Sterling Management route people into the Church of
8 Scientology. In fact, if they didn't, they would be chastised.
9 So their role is highly promoted and praised and cited with great
10 pride. It is disputed only when there is a legal case or when
11 the IRS might want to know about the flow of money between two
12 disparate entities.

13 47. For example, in Issue 26 of the magazine "Prosperity"
14 which is published by WISE International (Exhibit "54"), an
15 editorial on page 1 says, in part, "The impact by WISE members
16 this past year was unprecedented. Thousands of people were
17 gotten onto "The Bridge" by members who do management consulting
18 in the field and by members who FSM [Field Staff Member - the
19 acronym here is being used as a verb, basically meaning "sign
20 up"] their own employees and business associates. People who
21 begin to resolve seemingly unsolvable problems with LRH's
22 Admin[istrative] Tech[nology], invariably reach for more LRH Tech
23 to handle their personal life and thus begin The Bridge to
24 freedom by going to Scientology organizations."

25 48. In that same issue, Barbara Wilson of Sterling
26 Management is pictured on page 24 with a statement she wrote.
27 She says, "As [Sterling Management] clients get LRH's
28 Admin[istrative] Tech[nology], they inevitably reach for other

1 LRH Tech with many who end up on The Bridge to total freedom."

2 49. These references to "Scientology organizations" and
3 "The Bridge" and "other LRH Tech" are all references to what is
4 offered at a Church of Scientology.

5 50. It might be asked if people and this magazine are
6 referring to the Church of Scientology, why don't they say the
7 Church of Scientology? The reason is the IRS. One of my
8 functions in PR was to teach others how to rewrite their
9 statements so there would be no obvious connection made between
10 the for-profit groups and the Church of Scientology, which was
11 always fighting for its tax-exempt status. So our way of doing
12 it was to delete reference to the church as "church" and try to
13 refer to it benignly as "The Bridge" or "other Scientology
14 groups", etc. However, to a dedicated Scientologist, there is no
15 question what is being said. It is only to a non-Scientologist
16 that it might appear that they are not referring to the Church of
17 Scientology. That was the purpose in writing it this way, so
18 that if it were debated in court, the issue could be confused.

19 51. Those that send people to a Church of Scientology are
20 called an 'FSM', a Field Staff Member. The FSM can be a person
21 or a group. While the exact function and duties of an FSM has
22 evolved over the years since it started in the mid-1960's, an FSM
23 is basically a salesman who gets someone interested in buying
24 Scientology services. When the person buys the service, the FSM
25 gets a commission. It is as simple as that.

26 52. It could work in the following way: An FSM
27 disseminates or promotes a particular course to a person. That
28 person says they would like to do the course. The FSM fills out

1 a slip and tells them to take it to the org. The person does and
2 pays for the course. The FSM gets a commission on that and
3 subsequent services the person buys.

4 53. Because of the high cost of Scientology services, this
5 can be quite substantial. For example, in a newsletter issued by
6 the Flag Service Organization in Clearwater, Florida, they list
7 how much Sterling Management made in commissions. The
8 newsletters are undated but each make reference to commissions
9 made "in the past two weeks." They are during 1989-90. They are
10 cited by volume/issue number. They offer a spot survey on
11 Sterling Management's commissions with only one organization:

12	Vol. 17, Issue 4	\$7,220 (Exhibit "75")
13	Vol. 17, Issue 6	\$7,725
14	Vol. 17, Issue 8	\$9,896
15	Vol. 18, Issue 1	\$5,961
16	Vol. 18, Issue 2	\$2,158 (Exhibit "76")
17	Vol. 18, Issue 5	\$5,954 (Exhibit "77")

18 If the commission being paid is a minimum of 10% of what was
19 paid to the FSO by the selectee(s), multiplying the above amount
20 by 10 will give approximately how much money Sterling Management
21 fed to this one organization every two weeks. Sterling is an FSM
22 to several Scientology organizations.

23 54. Sterling Management takes great pride in how they are
24 able to create new Scientologists. For example, in an undated
25 issue of "Prosperity" (Vol. 2, Issue, 1, copyright 1985), it is
26 said that Sterling Management "has created an enormous flow of
27 clients onto the Bridge. In the last 12 months, Sterling
28 Management Systems has FSMed over 1.3 million dollars into the

1 San Francisco Mission, San Francisco Org, and Flag, from raw
2 public individuals. Greg and Debbie Hughes and Lyn Irons, owners
3 of the company, decided that the way to expand from here is to
4 get even closer to Source [L. Ron Hubbard]. As such, they have
5 now decided to turn the company into a WISE Office. . ."

6 55. That promise was fulfilled in an undated piece of
7 promotion that appears to be from 1987, where Sterling Management
8 is promoting itself as WISE Glendale. The promotion said
9 Sterling Management/WISE Glendale had "put as many as 1000 people
10 on the road to Clear and OT." (Exhibit "59") These are levels on
11 "The Bridge" which can be achieved only at a Church of
12 Scientology.

13 56. Another piece of Sterling Management promotion from
14 1991 is headlined, "Want to Really Help Clear the Planet?" This
15 is clearly directed to Scientologists for that is the objective
16 of the Church of Scientology. The promotion goes on to say,
17 "Sterling Management is the top FSM Group on the planet. . . . In
18 the first half of 1991, close to 800 Sterling clients became
19 Scientologists." (Exhibit "64") (No definition is offered but
20 to a Scientologist this means the taking of a Scientology service
21 at a Church of Scientology.)

22 57. In an undated piece of promotion for WISE, Susan Ochart
23 of Sterling Management said, "This last quarter, the number of
24 our clients that went Clear at Orange County Org alone totalled
25 109 [more than one a day.] That's what this is all about."
26 (Exhibit "66").

27 58. This statistic is apparently repeated in "The Auditor:
28 The Monthly Journal of Scientology" (Issue 253, copyright 1991)

1 (Exhibit "70"), which is published by the Church of Scientology
2 where it says, 'WISE field activities are very important in
3 Scientology expansion, for example Sterling Management in the USA
4 had 109 clients attest Clear in the last 3 months!'

5 59. Besides providing people and funds to Churches of
6 Scientology, Sterling Management also provides personnel to the
7 Sea Org. Sterling Management is, in the vernacular of
8 Scientology, a "recruitment pool."

9 60. A good example is shown by a "success story" by Anthony
10 Alvarez that was used to promote the Sea Org. Mr. Alvarez said
11 he had been working for Sterling Management when WDC WISE (Mr.
12 Greg Hughes) came by Sterling Management and recruited Mr.
13 Alvarez for the Sea Org. Mr. Alvarez's story is not unusual and
14 would be expected from an organization such as Sterling
15 Management. Knowing the Sea Org and Scientology organizations,
16 Mr. Hughes would have been welcome at Sterling Management at any
17 time and would have been treated as a VIP. He could have visited
18 as an individual or as part of an event. (Sea Org recruitment
19 tours regularly go through organizations.) Regardless, Mr.
20 Alvarez's recruitment into the Sea Org occurs in such
21 organizations all the time for that is one of their functions.
22 (Exhibit "83")

23 61. There is a magazine ("Freewinds") issued by the ship of
24 that name. The ship is operated exclusively by the Sea Org and
25 sails the Caribbean. The Freewinds offers the most exclusive
26 (and most expensive) services, including a section called "OT
27 VIII [8]". Issue #6 has an interview with Mr. Chris Estey after
28 he completed OT 8. (It contains some Scientology jargon that

1 will be defined.)

2 "Freewinds: That's fantastic! Are you still working
3 full time in Scientology?

4 Mr. Estey: Yes, I'm now the Executive Director at
5 Sterling Management. I realized that New OT IX [the
6 next level after OT 8] would never get released if we
7 didn't get the orgs [organizations] up to Saint Hill
8 size fast. [Saint Hill was a large facility in the U.K.
9 where LRH Lived and worked.] . . . I wanted to
10 contribute to the expansion of Scientology . . . I
11 connected up to Sterling Management because it is a
12 major contributor to org[anization] expansion. It FSMs
13 [the plural noun is being used as a verb] on the
14 biggest scale I could find. They are at the top as
15 FSMs for orgs such as Flag [in Florida], Orange County,
16 San Francisco, Los Angeles and many others."

17 62. Another way that Scientology gets money from Sterling
18 Management is via "donations" to the International Association of
19 Scientologists (IAS). According to an application for
20 membership, the purpose of the IAS "is to advance, protect and
21 support Scientology religion and Scientologists so that the
22 purpose of Scientology philosophy can be achieved and the goal of
23 freeing mankind come true." [sic] The application requires the
24 potential member agrees to "support dismantling of any groups and
25 organizations which have as their purpose to prevent Scientology
26 religion and freedom for mankind." (Exhibit "84)

27 63. According to the IAS magazine "Impact", Issue 35,
28 copyright 1990 (Exhibit "85"), Gregory K. Hughes and Kevin C.

1 Wilson are each listed as "Patron Meritorious" which means each
2 has donated more than \$250,000 to the IS "war chest". Deborah
3 (Mrs. Gregory) Hughes is listed as having donated \$100,000, as is
4 Barbara Wilson, wife of Sterling owner Kevin Wilson.

5 64. Kevin Wilson has also admitted that he contributed
6 \$3,000 a month to WISE to be a member of WISE's "CEO Circle."
7 (Exhibit "100", pp.64-66).

8 65. To a dedicated Scientologist, none of this is at all
9 unusual. In fact, it is highly commendatory that Sterling
10 Management would put this many new people onto "The Bridge" and
11 would, in turn, contribute this much money back to WISE. To a
12 dedicated Scientologist, the worth of bringing people into the
13 Church of Scientology by masking the introduction as "admin tech"
14 is measured by Sterling Management's success in recruiting for
15 Scientology.

16 66. That is how and why money and personnel move freely
17 between these organizations, regardless of any non-Scientology
18 regulations. To a dedicated Scientologist, it is simply a way to
19 "go free." In short, the end justifies the means.

20 I declare, under penalty of perjury, that the foregoing is
21 true and correct.

22 Executed this 28 day of September, 1993 at Naples Beach,
23 California.

24 
25 ROBERT VAUGHN YOUNG
26
27
28