

FILED IN OPEN COURT

AUG 15 1978

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JAMES F. DAVEY, Clerk

UNITED STATES OF AMERICA :

Criminal Case No. 8-00401

Grand Jury Original

v. :

Violations: 18 U.S.C. §§ 2, 371,
641, 1503, 1623
2511(1)(a) (Conspiracy,
Theft of Government
Property, Aiding and
Abetting, Obstruction
of Justice, False
Declarations Before
a Grand Jury,
Interception of Oral
Communication)

MARY SUE HUBBARD :

- JANE KEMBER :

- MORRIS BUDLONG, also known as :

MO BUDLONG :

HENNING HELDT :

DUKE SNIDER :

GREGORY WILLARDSON :

RICHARD WEIGAND :

MITCHELL HERMANN, also known as :

MIKE COOPER :

CINDY RAYMOND :

GERALD BENNETT WOLFE :

SHARON THOMAS ;

22 D.C. Code §§ 105,
1801(b) (Burglary,
Aiding and Abetting)

The Grand Jury charges:

INTRODUCTION

1. At all times material herein, the Church of Scientology (Scientology) had offices in various cities in the United States and elsewhere. Within Scientology, a department known as the "Guardian's Office" had responsibility to promote the interests of Scientology by covertly identifying, locating, and obtaining all Scientology-related information in the possession of various individuals, government agencies and private organizations.

2. At all times material herein, the Guardian's Office had worldwide headquarters (Guardian's Office WW) at Saint Hill Manor, East Grinstead, Sussex, England. It had United States headquarters (Guardian's Office US) in Los Angeles, California. It had a local office in the District of Columbia (Guardian's Office DC) and other cities throughout the United States. Each of the Guardian Offices was composed of five bureaus including the Information Bureau which was assigned the responsibility for the conduct of covert operations including the collec-

HART, J.

- 2 -

tion of data and documents of interest to Scientology.

3. At all times material herein, L. RON HUBBARD, who held the title of "Commodore," by virtue of his role as the founder and leader of Scientology exercised overall supervision of the Guardian's Office.

4. At all times material herein, MARY SUE HUBBARD held the titles of "Gontroller" and "Commodore Staff Guardian" (CSG) and as the second person in the hierarchy of Scientology had duties, under her husband L. RON HUBBARD, which included supervision of the Guardian's Office.

5. At all times material herein, JANE KEMBER had the title of "Guardian World-Wide" (GWW) and headed the daily operation of all Guardian's Offices, reporting directly to L. RON HUBBARD and MARY SUE HUBBARD.

6. At all times material herein, MORRIS BUDLONG, a/k/a MO BUDLONG (hereinafter MO BUDLONG), held the title "Deputy Guardian for Information World-Wide" (DG I WW), supervised all Information Bureaus around the world and reported directly to JANE KEMBER.

7. During the approximate periods listed below in the column entitled "Approximate Periods" the individuals listed below in the column entitled "Individuals" held the positions, in the Guardian's Office US, listed below in the column entitled "Positions":

<u>INDIVIDUALS</u>	<u>APPROXIMATE PERIODS</u>	<u>POSITIONS</u>
HENNING HELDT	Nov. 21, 1973 - June 20, 1977	Deputy Guardian US (DG US)
DUKE SNIDER	March 1974 - Dec. 1, 1974	Deputy Guardian - Information US (DG I US)
	Dec. 1, 1974 - June 20, 1977	Deputy-Deputy Guardian US (DDG US)
RICHARD WEIGAND	Dec. 1, 1974 - May 15, 1977	Deputy Guardian - Information US (DG I US)

8-00101

- 3 -

<u>INDIVIDUALS</u>	<u>APPROXIMATE PERIODS</u>	<u>POSITIONS</u>
GREGORY WILLARDSON	Sometime 1974 - Jan. 1, 1976	Information Bureau Branch I Director US
	Jan. 1, 1976 - June 16, 1977	Deputy-Deputy Guardian Information US (DDG I US)
	June 16, 1977 - June 20, 1977	Deputy Guardian Information US (DG I US)
MITCHELL HERMANN a/k/a MIKE COOPER	Jan. 1, 1974 - March 1, 1975	Branch I Director, Guardian's Office, DC
	Jan. 1, 1976 - March 1, 1977	Southeast US Secretary, Guardian's Office, US (SEUS SEC.)
CINDY RAYMOND	June 1, 1974 - Jan.1, 1976	Information Bureau Collections Officer US
	Jan. 1, 1976 - Sept. 1, 1976	Information Bureau Branch I Director US
	Sept. 1, 1976 - June 20, 1977	Information Bureau National Secretary US

8. From on or about January 1, 1974 until on or about June 11, 1976, MICHAEL J. MEISNER, also known as John M. Foster, Jeff Murphy, and "Herbert," held the title "Assistant Guardian for Information - DC" (AG I DC). As such, he supervised the Information Bureau in the District of Columbia, and reported to the Southeast US Secretary and the Deputy Guardian for Information US. From on or about July 1, 1976 until on or about August 30, 1976, he held the title "National Secretary - US" in Los Angeles, California. As such, he supervised the operation and formulation of Information Bureau programs of national scope.

9. At all times material herein, GERALD BENNETT WOLFE, also known as "Silver" and "Kelly," was an agent of Scientology. As such, from on or about November 18, 1974 until on or about June 30, 1976, he was a covert operative for the Guardian's Office employed as a clerk at the Internal Revenue Service of the United States Department of the Treasury (hereinafter IRS) in the District of Columbia.

- 4 -

10. At all times material herein, SHARON THOMAS, also known as "Judy," was an agent of Scientology. As such, from on or about February 29, 1976 until on or about November 5, 1976, she was a covert operative for the Guardian's Office employed as a secretary at the United States Department of Justice in the District of Columbia.

COUNT ONE

THE CONSPIRACY, ITS OBJECT AND MEANS

1. Beginning on or about November 21, 1973, and continuing until on or about May 27, 1977, within the District of Columbia and elsewhere, the defendants MARY SUE HUBBARD, JANE KEMBER, MO BUDLONG, HENNING HELDT, DUKE SNIDER, RICHARD WEIGAND, GREGORY WILLARDSON, MITCHELL HERMANN, a/k/a MIKE COOPER, CINDY RAYMOND, and SHARON THOMAS, together with unindicted co-conspirators Gerald Bennett Wolfe and Michael J. Meisner, and other unindicted coconspirators both known and unknown to the Grand Jury, willfully and knowingly did conspire, confederate, combine, and agree together and with each other, to commit offenses against the United States of America, that is, by various illegal and unlawful means, to locate and obtain illegally information and documents in the possession of the United States of America which were related to Scientology and to individuals, organizations and agencies perceived to be enemies of Scientology. The illegal and unlawful means which are known to the Grand Jury that were used or attempted to be used by the defendants and the unindicted co-conspirators were as follows:

a. To willfully and knowingly steal, purloin and convert to their own use records and things of value of the United States and departments and agencies thereof, that is, documents and photocopies thereof which were the property of the IRS, the United States Department of Justice, and the Office of the United States Attorney for the District of Columbia, in violation

- 5 -

of Title 18, United States Code, Section 641;

b. To willfully intercept and procure other persons to intercept oral communications made during a meeting of agents and employees of the IRS held at IRS headquarters in the District of Columbia, in violation of Title 18, United States Code, Section 2511(1)(a);

c. To falsely make and forge official passes and permits issued by and under the authority of the United States, that is, false identification cards bearing the seal of the IRS, for the purpose, among others, of gaining entry to various government buildings, in violation of Title 18, United States Code, Section 499;

d. To enter rooms of various employees of the IRS, the United States Department of Justice, and the Office of the United States Attorney for the District of Columbia, with intent to steal documents located therein, which were the property of the United States, in the care, custody and control of said agencies and their employees, in violation of Title 22, District of Columbia Code, Section 1801(b);

e. To recruit agents of Scientology to infiltrate various agencies and departments of the United States;

f. To place these agents in various positions within these agencies;

g. To use bogus credentials to gain access to various agencies and departments;

h. To utilize electronic surveillance devices;

i. To gain access to areas within these agencies which contained documents and information of value to Scientology.

- 6 -

OVERT ACTS

2. To effect the objects and means of this conspiracy, the defendants, together with the unindicted co-conspirators, committed various overt acts within the District of Columbia and elsewhere, including but not limited to the following:

(1) On or about November 21, 1973, JANE KEMBER issued a directive to HENNING HELDT ordering him and his staff to obtain all INTERPOL (the international police organization) documents relating to Scientology and connecting its founder, L. Ron Hubbard, to criminal activity.

(2) On or about July 1, 1974, DUKE SNIDER directed Michael J. Meisner to implement JANE KEMBER's directive described in the preceding subparagraph by obtaining all INTERPOL documents relating to Scientology from the INTERPOL office then located in the United States Department of the Treasury.

(3) On or about August 15, 1974, CINDY RAYMOND informed Michael J. Meisner that he was to assist her in recruiting a loyal Scientology agent for placement as an employee at the IRS in the District of Columbia.

(4) On or about September 15, 1974, CINDY RAYMOND notified Michael J. Meisner that she had selected Gerald Bennett Wolfe to be the Scientology agent at the IRS in the District of Columbia and that Meisner was to help him obtain a position there as soon as possible.

(5) On or about October 21, 1974, JANE KEMBER issued Guardian Program Order 1361 addressed to HENNING HELDT, DUKE SNIDER and RICHARD WEIGAND, directing, among other things, the infiltration of the District of Columbia offices of the IRS and of the Tax Division of the United States Department of Justice for the purpose of obtaining all files on Scientology,

- 7 -

its founder, L. Ron Hubbard, and internal memoranda of attorneys representing the government in Scientology - initiated lawsuits.

(6) On or about October 31, 1974, a Scientology agent transported an electronic listening device from Los Angeles, California, to the District of Columbia.

(7) On or about November 1, 1974, within the District of Columbia, MITCHELL HERMANN, a/k/a MIKE COOPER, and two other Scientology agents, placed an electronic listening device in an IRS conference room and recorded an IRS meeting concerning Scientology's application for tax exempt status and related matters.

(8) Between on or about November 10, 1974, and on or about November 14, 1974, MO BUDLONG, HENNING HELDT, DUKE SNIDER, and Michael J. Meisner sent numerous telexes relating to the placement of a Scientology agent at the IRS in the District of Columbia.

(9) On or about November 18, 1974, Gerald Bennett Wolfe began employment as a clerk-typist at the IRS in the District of Columbia.

(10) On or about December 4, 1974, DUKE SNIDER sent a telex to MO BUDLONG, informing him that the first shipment of stolen IRS documents had been received in Los Angeles.

(11) On or about December 5, 1974, MO BUDLONG sent a telex to DUKE SNIDER acknowledging receipt of the information regarding the stolen IRS documents.

(12) On or about December 30, 1974, within the District of Columbia, Gerald Bennett Wolfe stole documents from the office of Barbara Byrd of the Chief Counsel's Office of the IRS.

- 8 -

(13) On or about December 30, 1974, within the District of Columbia, Michael J. Meisner, having received a package of stolen documents referred to in the preceding subparagraph from Gerald Bennett Wolfe, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(14) Between on or about May 3, 1975 and on or about May 17, 1975, within the District of Columbia, Gerald Bennett Wolfe illegally entered on three occasions the offices of various United States Department of Justice Tax Division staff attorneys assigned to the defense of Scientology-initiated law suits and stole documents located therein.

(15) Between on or about May 3, 1975 and on or about May 17, 1975, within the District of Columbia, Michael J. Meisner, having received three packages of stolen documents referred to in the preceding subparagraph from Gerald Bennett Wolfe, forwarded said packages to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(16) On or about May 27, 1975, MARY SUE HUBBARD instructed JANE KEMBER and HENNING HELDT to "use any method at our disposal to win the battle and gain our non-profit [tax] status."

(17) On or about June 18, 1975, HENNING HELDT wrote a letter to MARY SUE HUBBARD and JANE KEMBER informing them that HUBBARD's order referred to in the preceding subparagraph had been relayed to the Information Bureau with instructions to complete within two to three months the collection of documents from the IRS and the Tax Division of the United States Department of Justice.

(18) On or about June 4, 1975, GREGORY WILLARDSON wrote a letter to Michael J. Meisner directing him to prepare a plan to obtain by August 30, 1975 all documents of interest to Scientology

- 9 -

which were in the possession of the IRS Office of International Operations, Intelligence Division, and Special Services Section.

(19) On or about June 11, 1975, within the District of Columbia, Michael J. Meisner wrote a letter in response to the letter of GREGORY WILLARDSON described in the preceding subparagraph and attached the requested plan.

(20) On or about June 30, 1975, GREGORY WILLARDSON wrote a letter to Michael J. Meisner approving the plan described in the preceding subparagraph.

(21) On or about June 21, 1975, within the District of Columbia, Gerald Bennett Wolfe stole documents from the office of Lewis Hubbard of the Chief Counsel's Office of the IRS.

(22) On or about June 21, 1975, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe a package of stolen documents referred to in the preceding subparagraph, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(23) On or about June 27, 1975, JANE KEMBER and MO BUDLONG issued Guardian Program Order 9 directing that all INTERPOL documents relating to Scientology and its founder L. Ron Hubbard be obtained through infiltration of, or the placing of "clandestine agents" in, the INTERPOL offices at the United States Department of the Treasury.

(24) On or about July 2, 1975, DUKE SNIDER wrote a letter to RICHARD WEIGAND directing him to obtain by August 30, 1975, all Scientology-related documents in possession of the IRS in the District of Columbia and thereafter to obtain all Scientology-related documents from the possession of the

Tax Division of the United States Department of Justice.

(25) On or about July 28, 1975, within the District of Columbia, Gerald Bennett Wolfe stole documents from the Disclosure Division of the Chief Counsel's Office of the IRS.

(26) On or about July 28, 1975, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe a package of stolen documents referred to in the preceding subparagraph, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(27) Between on or about September 24, 1975 and on or about September 30, 1975, within the District of Columbia, Gerald Bennett Wolfe on two occasions stole documents pertaining to Scientology from the Disclosure Division of the Chief Counsel's Office of the IRS.

(28) Between on or about September 24, 1975 and on or about September 30, 1975, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe two packages of stolen documents referred to in the preceding subparagraph, forwarded said packages to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(29) On or about December 5, 1975, HENNING HELDT and RICHARD WEIGAND issued on behalf of JANE KEMBER Guardian Program Order 158 ("Early Warning System") which was designed to protect the "personal security" of Scientology's founder L. Ron Hubbard. The order called for the infiltration of government agencies which had power to subpoena or bring suits against Hubbard or which would possess advance warning of such subpoenas or suits.

- 11 -

(30) On or about December 10, 1975, CINDY RAYMOND directed Michael J. Meisner to implement Guardian Program Orders 9 (referred to in subparagraph 23 above) and 158 (referred to in the preceding paragraph), as well as JANE KEMBER's order of November 21, 1973 to obtain all INTERPOL documents on Scientology, by placing a Scientology agent in the United States Department of Justice.

(31) On or about December 15, 1975, within the District of Columbia, Michael J. Meisner, having selected SHARON THOMAS to become Scientology's agent within the United States Department of Justice, requested approval of his choice from RICHARD WEIGAND.

(32) On or about December 20, 1975, RICHARD WEIGAND sent a telex to Michael J. Meisner approving the selection and placement of SHARON THOMAS as Scientology's agent at the United States Department of Justice.

(33) On or about January 18, 1976, within the District of Columbia, Michael J. Meisner, Gerald Bennett Wolfe, and a Scientology agent sent from Los Angeles, entered the office of Lewis Hubbard of the Chief Counsel's Office of the IRS and stole documents located therein.

(34) On or about January 21, 1976, RICHARD WEIGAND wrote a letter to HENNING HELDT informing him that the IRS office of Lewis Hubbard in the District of Columbia had been entered by Scientology agents and that numerous IRS documents had been stolen therefrom.

(35) Between on or about February 1, 1976 and February 15, 1976, HENNING HELDT, RICHARD WEIGAND, GREGORY WILLARDSON, Michael J. Meisner and other Guardian's Office officials met in various groups on several occasions in Los Angeles, California, to discuss the burglaries and the infiltration of United States

- 12 -

government agencies in the District of Columbia and the documents which had been stolen from those agencies.

(36) On or about February 11, 1976, RICHARD WEIGAND wrote a letter to JANE KEMBER, informing her that all IRS documents sought pursuant to Scientology's Guardian Program Order 1361 had been obtained through Scientology infiltration of the IRS.

(37) On or about February 29, 1976, SHARON THOMAS began employment as a secretary at the United States Department of Justice in the District of Columbia for the purpose of obtaining documents and information of interest to Scientology.

(38) On or about March 4, 1976, within the District of Columbia, Gerald Bennett Wolfe stole documents from the office of Joseph Tedesco of the Exempt Organization Division of the IRS.

(39) On or about March 4, 1976, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe a package of stolen documents referred to in the preceding subparagraph, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(40) On or about March 10, 1976, within the District of Columbia, Gerald Bennett Wolfe stole documents from the office of Jeanne Gessay, of the Exempt Organization Division of the IRS.

(41) On or about March 10, 1976, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe a package of stolen documents referred to in the preceding subparagraph, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-

- 13 -

conspirators.

(42) On or about March 15, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe entered the identification equipment room at the IRS and falsely made for themselves forged official IRS credentials bearing false names.

(43) On or about March 22, 1976, within the District of Columbia, Gerald Bennett Wolfe stole documents from the office of Assistant Commissioner Alvin Lurie of the IRS.

(44) On or about March 22, 1976, within the District of Columbia, Michael J. Meisner, having received from Gerald Bennett Wolfe a package of stolen documents referred to in the preceding subparagraph, forwarded said package to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(45) Between on or about March 22, 1976 and April 26, 1976, within the District of Columbia, SHARON THOMAS on a number of occasions stole documents from the office of United States Department of Justice Attorney Paul Figley.

(46) Between on or about March 22, 1976 and on or about April 26, 1976, within the District of Columbia, Michael J. Meisner, having received from SHARON THOMAS packages of stolen documents referred to in the preceding subparagraph, forwarded said packages to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(47) On or about March 27, 1976, MARY SUE HUBBARD, JANE KEMBER, MO BUDLONG, HENNING HELDT, RICHARD WEIGAND, GREGORY WILLARDSON approved Guardian Program Order 302 which was written by CINDY RAYMOND. The order directed the infiltration of all government agencies for the purpose of illegally obtaining those documents relating to Scientology which had been

- 14 -

withheld by these agencies pursuant to provisions of the Freedom of Information Act.

(48) On or about April 9, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe entered the office of Associate Deputy Attorney General Togo G. West, Jr. at the United States Department of Justice, stole documents located therein, and forwarded them to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(49) Between on or about April 14, 1976 and on or about May 17, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe on at least two occasions entered the Office of International Operations of the IRS, stole documents located therein, and forwarded them to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(50) On or about April 27, 1976, RICHARD WEIGAND wrote an order to MITCHELL HERMANN, a/k/a MIKE COOPER, directing him to implement burglaries of the office of Assistant United States Attorney Nathan Dodell in the District of Columbia and obtain any documents containing any prediction on any potential subpoena or deposition of L. Ron Hubbard.

(51) Between on or about April 30, 1976 and May 17, 1976, within the District of Columbia, SHARON THOMAS and Michael J. Meisner, on two occasions, burglarized the office of Special Assistant to the Assistant Attorney General for Administration John F. Shaw at the United States Department of Justice and stole documents found therein. Meisner then forwarded these documents to Los Angeles for distribution to the defendants and unindicted co-conspirators.

- 15 -

(52) On or about May 1, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe entered the United States Courthouse in order to locate the office of Assistant United States Attorney Nathan Dodell.

(53) On or about May 4, 1976, within the District of Columbia, Gerald Bennett Wolfe stole from the United States Courthouse, keys to the office of Assistant United States Attorney Nathan Dodell for the purpose of having them duplicated.

(54) On or about May 21, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe entered the office of Assistant United States Attorney Nathan Dodell in the United States Courthouse and stole documents located therein. Meisner then reported to RICHARD WEIGAND details of the entry and forwarded the stolen documents to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(55) On or about May 28, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe again entered the office of Assistant United States Attorney Nathan Dodell in the United States Courthouse and stole documents located therein. Meisner then reported details of the entry to his superiors in Los Angeles and forwarded the stolen documents to Los Angeles for distribution to the defendants and unindicted co-conspirators.

(56) On or about June 11, 1976, within the District of Columbia, Michael J. Meisner and Gerald Bennett Wolfe entered the United States Courthouse for the purpose of burglarizing and stealing documents from the office of Assistant United States Attorney Nathan Dodell and were confronted by agents of the Federal Bureau of Investigation.