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(57) On or about December 18, 1976, MITCHELL HERMANN, a/k/a MIKE COOPER, wrote a letter to HENNING HELDT and RICHARD WEIGAND explaining the attached "Project Troy" which called for the placing of a permanent electronic surveillance device in the IRS Chief Counsel's Office in the District of Columbia so that Scientology would remain informed of all IRS discussions relating to Scientology's request to be exempted from taxation.

(58) On or about December 20, 1976, HENNING HELDT approved "Project Troy" described in the preceding paragraph.

(59) On or about May 27, 1977, HENNING HELDT, GREGORY WILLARDSON and MO BUDLONG issued on behalf of JANE KEMBER Guardian Program Order 158 R ("Early Warning System") which called once again for the infiltration of the Office of the United States Attorney for the District of Columbia for the purpose of obtaining information about any potential legal action against L. Ron Hubbard.

(Violation of 18 U.S. Code §371)

COUNT TWO

On or about November 1, 1974, within the District of Columbia, the defendants MARY SUE HUBBARD, JANE KEMBER, MO BUDLONG, HENNING HELDT, DUKE SNIDER, RICHARD WEIGAND, GREGORY WILLARDSON, and MITCHELL HERMANN, a/k/a MIKE COOPER, and CINDY RAYMOND did willfully intercept and procure other persons to intercept an oral communication, that is, oral communications made during a meeting of agents and employees of the Internal Revenue Service of the United States Department of the Treasury, held at the IRS headquarters in the District of Columbia.

(Violation of 18 U.S. Code §§2511(1)(a), 2)

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COUNTS THREE TO EIGHT

On or about the dates for each count listed below in the column entitled "Dates", within the District of Columbia, 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 GERALD BENNETT WOLFE entered a room consisting of the office of the individual listed below in the column entitled "Office of" with intent to steal property of another, that is, documents and photocopies thereof, located therein, which were the property of the United States of America, in the care, custody and control of the individual listed below in the column entitled "Individual":

<u>COUNT</u>	<u>DATE</u>	<u>OFFICE OF</u>	<u>INDIVIDUAL</u>
3	January 18, 1976	Lewis J. Hubbard IRS, Office of Chief Counsel, 1111 Consti- tution Avenue, Northwest	Lewis J. Hubbard
4	March 4, 1976	Joseph A. Tedesco IRS, Exempt Organization Division, 1111 Consti- tution Avenue, Northwest	Joseph Tedesco
5	March 10, 1976	Jeanne Gessay IRS, Exempt Organization Division, 1111 Consti- tution Avenue, Northwest	Jeanne Gessay
6	March 15, 1976	IRS Identification Room 1111 Constitution Avenue, Northwest	Agents and Employees of the IRS
7	April 8, 1976	Associate Deputy Attorney General, Togo G. West, Jr. United States Department of Justice Constitution Avenue and Ninth Street, Northwest	Togo G. West, Jr.
8	April 14, 1976	IRS Office of International Operations, Howard J. Rosen 1325 K Street, Northwest	Howard J. Rosen

(Violations of 22 D.C. Code §§1801(b), 105)

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COUNTS NINE-THIRTEEN

On or about the dates for each count listed below in the column entitled "Dates", within the District of Columbia, 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 GERALD BENNETT WOLFE did willfully and knowingly steal, purloin and convert to their own use records and things of value of the United States and of a department and agency thereof, that is, a package of documents and photocopies thereof, the property of the department and agency listed below in the column entitled "Department and agency," in the care, custody and control of the individual listed below in the column entitled "Individual":

<u>COUNT</u>	<u>DATE</u>	<u>DEPARTMENT AND AGENCY</u>	<u>INDIVIDUAL</u>
9	June 21, 1975	IRS, Office of Chief Counsel	Lewis J. Hubbard
10	March 4, 1976	IRS, Exempt Organization Division	Joseph A. Tedesco
11	March 10, 1976	IRS, Exempt Organization Division	Jeanne Gessay
12	April 9, 1976	United States Department of Justice	Togo G. West, Jr.
13	April 14, 1976	IRS, Office of International Operations	Howard J. Rosen

(Violation of 18 U.S. Code §641, 2)

COUNTS FOURTEEN-FIFTEEN

On or about the dates for each count listed below in the column entitled "Dates," within the District of Columbia, 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 entered a room consisting of the office of

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<u>COUNT</u>	<u>DATE</u>	<u>DEPARTMENT AND AGENCY</u>	<u>INDIVIDUAL</u>
18	May 17, 1976	United States Department of Justice	John F. Shaw

(Violations of 18 U.S. Code §§641, 2)

COUNTS NINETEEN-TWENTY

On or about the dates for each count, listed below in the column entitled "Dates," within the District of Columbia, the defendants MARY SUE HUBBARD, JANE KEMBER, MO BUDLONG, HENNING HELDT, DUKE SNIDER, RICHARD WEIGAND, GREGORY WILLARDSON, MITCHELL HERMANN, a/k/a MIKE COOPER, and CINDY RAYMOND entered the office of Assistant United States Attorney Nathan Dodell, located in the United States Courthouse, Constitution Avenue and John Marshall Place, Northwest, with intent to steal property of another, that is, documents and photocopies thereof, located therein, which were the property of the United States of America, in the care, custody and control of Nathan Dodell.

<u>COUNT</u>	<u>DATE</u>
19	May 21, 1976
20	May 28, 1976

(Violation of 22 D.C. Code §§ 1801(b), 105)

COUNTS TWENTY ONE-TWENTY TWO

On or about the dates for each count listed below in the column entitled "Dates," within the District of Columbia, the defendants MARY SUE HUBBARD, JANE KEMBER, MO BUDLONG, HENNING HELDT, DUKE SNIDER, RICHARD WEIGAND, GREGORY WILLARDSON, MITCHELL HERMANN, a/k/a MIKE COOPER and

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John F. Shaw, Special Assistant to the Assistant Attorney General for Administration, United States Department of Justice, Constitution Avenue and Ninth Street, Northwest, with intent to steal property of another, that is, documents and photocopies thereof, located therein, which were the property of the United States of America, in the care, custody and control of John F. Shaw:

<u>COUNT</u>	<u>DATE</u>
14	April 29, 1976
15	May 17, 1976

(Violation of 22 D.C. Code §§ 1801(b), 105)

COUNTS SIXTEEN-EIGHTEEN

On or about the dates for each count listed below in the column entitled "Dates," within the District of Columbia, 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 did willfully and knowingly steal, purloin and convert to their own use records and things of value of the United States and a department and agency thereof, that is, a package of documents and photocopies thereof, the property of the department and agency listed below in the column entitled "Department and Agency," in the care, custody and control of the individual listed below in the column entitled "Individual":

<u>COUNT</u>	<u>DATE</u>	<u>DEPARTMENT AND AGENCY</u>	<u>INDIVIDUAL</u>
16	April 26, 1976	United States Department of Justice	Paul Figley
17	April 29, 1976	United States Department of Justice	John F. Shaw

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CINDY RAYMOND did willfully and knowingly steal, purloin and knowingly convert to their own use records and things of value of the United States and a department and agency thereof, that is, a package of documents and photocopies thereof, the property of the Office of the United States Attorney for the District of Columbia, in the care, custody and control of Assistant United States Attorney Nathan Dodell.

<u>COUNT</u>	<u>DATE</u>
21	May 21, 1976
22	May 28, 1976

(Violation of 18 U.S. Code §§ 641, 2)

COUNT TWENTY-THREE

1. Between on or about May 21, 1976 and on or about June 11, 1976, within the District of Columbia, GERALD BENNETT WOLFE and Michael J. Meisner, on three occasions, entered the United States Courthouse for the purpose of burglarizing and stealing documents from the office of an Assistant United States Attorney. On each occasion, Meisner, and on one occasion WOLFE, gained entry fraudulently, through the use of forged IRS credentials bearing false names.

2. On or about June 11, 1976, during the third of these entries, GERALD BENNETT WOLFE and Michael J. Meisner were confronted and questioned by agents of the Federal Bureau of Investigation (FBI).

3. Beginning on or about June 11, 1976 and continuing up to and including on or about July 8, 1977, as a result of the confrontation referred to in the preceding paragraph, the FBI and the Office of the United States Attorney for the District of Columbia were conducting an investigation which was continued in conjunction with a Grand Jury of the United States District Court for the District of Columbia

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duly empaneled and sworn on or about October 13, 1976, to determine whether violations of statutes of the United States and of the District of Columbia had been committed in the District of Columbia and elsewhere, and to identify the individuals who had committed such violations.

4. On or about June 30, 1976, within the District of Columbia, GERALD BENNETT WOLFE was arrested by agents of the FBI and charged with the use and possession of a forged official government pass in violation of 18 U.S. Code §499.

5. On or about August 5, 1976, within the District of Columbia, a United States Magistrate Arrest Warrant was issued for Michael J. Meisner charging him with the use and possession of a forged official government pass in violation of 18 U.S. Code §499.

6. On or about May 13, 1977, an information was filed in the United States District Court for the District of Columbia in Criminal Case No. 77-283 charging GERALD BENNETT WOLFE with the wrongful use of the government seal in violation of 18 U.S. Code §1017. That same day, WOLFE entered a plea of guilty to that charge.

7. On or about June 10, 1977, within the District of Columbia, GERALD BENNETT WOLFE was sentenced in Criminal Case No. 77-283 by United States District Judge Thomas A. Flannery. That same day, WOLFE testified, pursuant to a subpoena, before the Grand Jury described in paragraph three (3) above.

THE CONSPIRACY

8. Beginning on or about June 11, 1976, and continuing at least until on or about July 8, 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 GERALD BENNETT WOLFE, together with unindicted co-conspirator Michael J. Meisner, and other unindicted co-conspirators both known and unknown to the Grand

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Jury, willfully and knowingly did conspire, confederate, combine, and agree together and with each other, to commit offenses against the United States of America, to wit:

(a) to obstruct justice in violation of Title 18, United States Code, Section 1503;

(b) to obstruct a criminal investigation in violation of Title 18, United States Code, Section 1510;

(c) to harbor and conceal a fugitive from arrest in violation of Title 18, United States Code, Section 1071;

(d) to make false declarations in violation of Title 18, United States Code, Section 1623;

all in violation of Title 18, United States Code, Section 371.

OBJECT AND MEANS

9. It was an object of said conspiracy to corruptly influence, obstruct and impede, and corruptly endeavor to influence, obstruct and impede, the due administration of justice in connection with the investigation referred to in paragraph three (3) above, and in connection with the case of United States v. Gerald Bennett Wolfe, Criminal Case No. 77-283, referred to in paragraphs six and seven (6 and 7) above, for the purpose of concealing and causing to be concealed the identities of the persons who were responsible for, participated in, and had knowledge of (a) activities which were the subject of the above-mentioned investigation and judicial proceedings, and (b) other illegal and improper activities.

10. It was further an object of said conspiracy, for the purposes stated in paragraph nine (9) above, willfully to endeavor by means of misrepresentation, intimidation, and force and threats thereof to obstruct, delay, and prevent the communication of information relating to a violation of a criminal statute of the United States by a person to a criminal investigator.

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11. It was further an object of said conspiracy, for the purposes stated in paragraph nine (9) above, that the defendants and unindicted co-conspirators, having received notice and acquired knowledge of the fact that an arrest warrant for Michael J. Meisner had been issued under provisions of a law of the United States, would and did harbor and conceal him, so as to prevent his discovery and arrest.

12. It was further an object of said conspiracy, for the purposes stated in paragraph nine (9) above, that the defendants and unindicted co-conspirators, knowingly made and caused to be made false material declarations under oath in proceedings before a Grand Jury of the United States.

13. Among the means by which the defendants and the unindicted co-conspirators would and did carry out the aforesaid objects of the conspiracy were the following:

(a) The defendants and the unindicted co-conspirators would and did plan, solicit, assist and facilitate the giving of false, deceptive, evasive and misleading statements and testimony;

(b) The defendants and the unindicted co-conspirators would and did give false, misleading, evasive and deceptive statements and testimony;

(c) The defendants and the unindicted co-conspirators, in order to limit the investigation by exposing only GERALD BENNETT WOLFE and Michael J. Meisner to criminal prosecution and in order to prevent the uncovering of the true facts regarding the scope of their illegal activities, would and did plan, solicit, order, assist, encourage and facilitate the entry of a plea of guilty by Wolfe;

(d) The defendants and the unindicted co-conspirators, in an effort to harbor and conceal unindicted co-conspirator

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Michael J. Meisner, would and did plan, direct, order, and assist in his initial concealment, and later in his forcible removal to secure hiding places where he was kept under guard.

OVERT ACTS

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

(1) On or about June 11, 1976, after Michael J. Meisner notified MITCHELL HERMANN, a/k/a MIKE COOPER, that he had been confronted by the FBI in the United States Courthouse in the District of Columbia, HERMANN, after discussing the matter with RICHARD WEIGAND, directed Meisner to stay in a hotel overnight, prepare a memorandum detailing what had occurred in the Courthouse that evening, and leave for Los Angeles the next morning for further meetings.

(2) On or about June 11, 1976, RICHARD WEIGAND wrote a letter to MO BUDLONG, notifying him of the events which had transpired in the United States Courthouse in the District of Columbia, and of the cover plans which he and his superiors in the Guardian's Office - US proposed to implement.

(3) On or about June 12, 1976, RICHARD WEIGAND, GREGORY WILLARDSON and Michael J. Meisner had a meeting in Los Angeles, to discuss Meisner's report on his confrontation with the FBI the previous day, and to formulate the Guardian's Office's strategy in response to the anticipated federal investigation into the Courthouse entry in the District of Columbia.

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(4) On or about June 12, 1976, RICHARD WEIGAND ordered Michael J. Meisner to stay at a nearby hotel in Los Angeles under a false name.

(5) On or about June 13, 1976, HENNING HELDT, DUKE SNIDER, RICHARD WEIGAND, and Michael J. Meisner had a meeting in Los Angeles to discuss the alternative cover up plans prepared the previous day by WEIGAND, GREGORY WILLARDSON and Meisner and decided that a further plan should be considered.

(6) On or about June 13, 1976, RICHARD WEIGAND, GREGORY WILLARDSON, MITCHELL HERMANN, a/k/a MIKE COOPER, and Michael J. Meisner had a meeting in Los Angeles to discuss yet another cover up plan.

(7) On or about June 13, 1976, HENNING HELDT, DUKE SNIDER and RICHARD WEIGAND had a meeting in Los Angeles to discuss the cover up plan referred to in the preceding subparagraph. At the conclusion of the meeting, HELDT approved the cover up plan pursuant to which GERALD BENNETT WOLFE would be told to continue working at the IRS until he was arrested, give the agreed upon cover story to the federal authorities, plead guilty, and Michael J. Meisner would then surrender, give the same cover story, and plead guilty.

(8) On or about June 14, 1976, pursuant to the directions of his superiors, Michael J. Meisner changed his physical appearance to avoid arrest.

(9) On or about June 14, 1976, GERALD BENNETT WOLFE, RICHARD WEIGAND, GREGORY WILLARDSON and Michael J. Meisner had a meeting in Los Angeles, at which WOLFE was briefed on the previously agreed upon cover story, and pursuant to the agreed upon plan, was directed to return to

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the District of Columbia, await arrest, give that cover story to the federal authorities and plead guilty.

(10) On or about June 14, 1976, MITCHELL HERMANN, a/k/a MIKE COOPER, travelled to the District of Columbia to supervise the execution of the cover up plan in the District of Columbia.

(11) On or about July 1, 1976, the defendants and unindicted co-conspirators arranged for Michael J. Meisner to stay away from the District of Columbia, remain in Los Angeles by appointing him National Secretary - US and directing him to use the alias "Jeff Murphy."

(12) On or about June 30, 1976, MITCHELL HERMANN, a/k/a MIKE COOPER, wrote a letter to RICHARD WEIGAND which notified him of GERALD BENNETT WOLFE's arrest by the FBI that same day in the District of Columbia, and of the steps which were being taken as a result thereof, including the destruction of evidence linking Meisner and WOLFE to Scientology.

(13) Beginning on or about July 1, 1976, and continuing until on or about July 13, 1976, MARY SUE HUBBARD, MO BUDLONG, and RICHARD WEIGAND discussed in various correspondence the arrest of GERALD BENNETT WOLFE, the cover story to be used by him and Michael J. Meisner and the destruction of all evidence linking Meisner to the Guardian's Office and Scientology.

(14) On or about August 30, 1976, within the District of Columbia, the Assistant Guardian for Legal Affairs - DC wrote a letter to the Deputy Guardian for Legal Affairs - US which informed her that FBI Agents had visited the Church of Scientology and had advised them (1) that a warrant had been issued for the arrest of

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Michael J. Meisner, and (2) that the law prohibited the harboring of fugitives.

(15) On or about August 30, 1976, RICHARD WEIGAND wrote a letter to MARY SUE HUBBARD which informed her that a warrant had been issued for the arrest of Michael J. Meisner and that he had ordered the removal of Meisner from all official Guardian's Office positions, ordered Meisner to further alter his physical appearance, and decided to send Meisner out of the country so he could not be located by the authorities.

(16) Sometime after on or about August 30, 1976, MARY SUE HUBBARD wrote a letter to RICHARD WEIGAND, responding to his letter referred to in the preceding subparagraph, telling him that instead of sending Meisner out of the country, it was preferable to have him disappear within the United States.

(17) On or about September 2, 1976, RICHARD WEIGAND wrote a letter to MARY SUE HUBBARD which notified her that under the plans in effect Michael J. Meisner would not surrender until the Guardian's Office determined it was in its best interest for him to do so.

(18) On or about September 3, 1976, RICHARD WEIGAND and HENNING HELDT wrote a letter to MITCHELL HERMANN, a/k/a MIKE COOPER, which directed him to hide Meisner in the Los Angeles, California, area.

(19) On or about September 26, 1976, Michael J. Meisner wrote a letter to MARY SUE HUBBARD which discussed the previously approved cover up plans for the District of Columbia situation and some alternative proposals he was submitting for her approval.

(20) On or about September 30, 1976, MARY SUE HUBBARD

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wrote a letter to RICHARD WEIGAND which directed him to prepare for her a list of all buildings which Michael J. Meisner had illegally entered.

(21) On or about October 8, 1976, RICHARD WEIGAND responded to the letter of MARY SUE HUBBARD described in the preceding subparagraph and informed her of all the government agencies and private organizations which GERALD BENNETT WOLFE, Michael J. Meisner and other Guardian's Office operatives had illegally entered, the number of illegal incursions made, and the false names used on each occasion.

(22) On or about October 18, 1976, CINDY RAYMOND wrote a letter to RICHARD WEIGAND informing him that she was in the process of complying with his order to create false leads for the FBI in their WOLFE-Meisner investigation.

(23) On or about October 31, 1976, MARY SUE HUBBARD wrote a letter to RICHARD WEIGAND in which she discussed a further aspect of the cover story which could be used by GERALD BENNETT WOLFE and Michael J. Meisner in the District of Columbia.

(24) On or about November 1, 1976, HENNING HELDT wrote a letter to GREGORY WILLARDSON in which he told him to order GERALD BENNETT WOLFE to have his attorney resolve the case pending against him more speedily.

(25) On or about November 4, 1976, DUKE SNIDER wrote a letter to HENNING HELDT which informed him that, pursuant to the previously agreed cover up plans, all Guardian's Office files were being purged of all references to Michael J. Meisner and his activities on behalf of Scientology.

(26) On or about November 26, 1976, Michael J. Meisner wrote a letter to MARY SUE HUBBARD which reviewed the events

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surrounding the preparation of the cover story and cover up plans by the other defendants and unindicted co-conspirators.

(27) On or about November 30, 1976, MITCHELL HERMANN, a/k/a MIKE COOPER, wrote a report summarizing the events leading up to the illegal entry and burglary of the United States Courthouse in the District of Columbia and the preparation of the subsequent cover up plans.

(28) On or about December 9, 1976, RICHARD WEIGAND sent to MARY SUE HUBBARD the complete agreed upon cover up plan for the handling of the investigation of the illegal entry and burglary of the United States Courthouse in the District of Columbia.

(29) On or about December 9, 1976, RICHARD WEIGAND sent to MO BUDLONG, a copy of the complete agreed upon cover up plan referred to in the preceding subparagraph.

(30) On or about January 7, 1977, MITCHELL HERMANN, a/k/a MIKE COOPER, wrote a letter to HENNING HELDT informing him of the particulars of a meeting between GERALD BENNETT WOLFE, his attorney, and the Office of the United States Attorney for the District of Columbia.

(31) On or about January 23, 1977, MITCHELL HERMANN, a/k/a MIKE COOPER, wrote a memorandum to HENNING HELDT and RICHARD WEIGAND, informing them of a meeting which GERALD BENNETT WOLFE was scheduled to have with the Office of the United States Attorney for the District of Columbia which should "serve as a means of presenting further cover story to them as a possible means of forestalling a possible grand jury."

(32) On or about March 23, 1977, CINDY RAYMOND wrote a letter and report to HENNING HELDT and RICHARD WEIGAND