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Attorneys for Respondent United States of America \* Nos Angeles Ofmes

Frt., Nov. 3, 1978-Part 1 27

The U.S. Justice Department, at least for the next

month, cannot disseminate to the public or other governmental agencies documents seized by the FBI from the Church of Scientology July 8, 1977, the U.S. 9th Circuit Court of Agreels has ruled.

The appellate court said materials seized from the Scientology headquarters here can be presented to faderal

tology headquarters here can be presented to federal grand juries, but to no one else pending appeal of the

A hearing on the merits of the Scientology suit seeking to have the seizure declared illegal was set by the court for

Many of the documents taken by the FBI under a search warrant were presented to a federal grand jury in Washington, D.C., this summer, resulting in an indictment of many of Scientology's top national and world leaders.

Those indicted were accused of conspiring to infiltrate, burglarize and bug various federal offices in Washington. It was not immediately clear whether the appellate court's order could preclude the documents seized from being introduced into avidence in any of the pretrial proceedings. troduced into evidence in any of the pretrial proceedings or trial of those indicted.

## UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY OF CALIFORNIA,

Petitioner,

UNITED STATES OF AMERICA,

Respondent.

NO. CV 77-2565-MML

RESPONDENT'S SUBMISSION OF

SEARCH WARRANTS INVENTORIES

MARKED WITH DOCUMENTS TO BE

RETURNED TO PETITIONER.

The United States of America, respondent in this matter, respectfully submits the attached inventories of the documents seized during the searches of Fifield Manor and the Cedars-Sinai Complex in Los Angeles on July 8-9, 1977, marked with an "R" next to the items which the United States will return to petitioner.

In view of the related proceedings currently being held in the District of Columbia, counsel for the United States

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The United States has indicated in the past that it  $\overline{ ext{d}}$ oes not intend to keep and use in the expected criminal (Footnote 1 continued)

have been unable to complete a thorough review of all documents in time for this filing. It is, therefore, likely that a limited number of additional documents seized from the Cedars-Sinai Complex will be returned. We will file any addendum to this submission no later than May 25, 1978. Respectfully submitted,

ANDREA SHERIDAN ORDIN United States Attorney

ROBERT L. BROSIO Assistant United States Attorney Chief, Criminal Division

DAVID R. HINDEN Assistant United States Attorney Assistant Chief, Criminal Division

RAYMOND BANOUN Special Assistant to the United States Attorney

Attorneys for Respondent United States of America

(Footnote 1 continued) proceedings all of the documents seized pursuant to the search warrants. This does not mean, however, that it is the opinion of the United States that In fact many of the these documents were improperly seized. documents which are being returned corroborate the allegations contained in the search warrant affidavits, many fall within specifically enumerated items in the search warrants, and others are copies of identical documents which are being These documents are being returned because they retained. are not necessary to the anticipated criminal proceedings which counsel for the United States has been able to narrow substantially since the execution of the warrants. especially so in view of the abundant corrobation contained in the retained documents. Many of the doucments are also being returned, although legitimately seized, in order to save considerable amount of time which this Court may otherwise have to devote to these proceedings.

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The following documents were located in the large secretary's office in a closet containing three shelves of documents and a large amount of documents piled on the floor:

The following documents were located on Shelf designated 2-S:

2-S-1 338) R One Guardian Programme Order dated April 22, 1977, furnishing information on one Richard Delgado. This is a four-page document.

2-5-2 3382 R One Guardian Programme Order dated April 22, 1977, a five-page document concerning "Psychological Practices."

2-S-3 3383 R One Guardian Programme Order dated January 25, 1977, regarding "Snow White PGM," a two-page document.

2-S-4 3384 R One Guardian Programme Order dated November 5, 1976, concerning programme potential criminal investigation, an 8-page document.

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## 4 LA 47-12230 CV/251

Gurrison Book No. 2 2239 57. 1315 58.R Compliance Report dated April 14, 1977 59.R 76 Investigation Report dated March 3, 1977 75 60. Time Track for Nathan Dodell Compliance Report dated October 5, 1976 1305 61.R 62.R Compliance Report regarding FRANK DANIELS dated April 14, 1977 1306 1301. 63. List of 301's to be done dated September 28, 1976 3497 64. Compliance Report dated December 6, 1976 3496 65. Summary Report dated January 4, 1977 3495 €6. Compliance Report dated November 10, 1976 Compliance Report dated February 25, .1977 3494 67. Note from FRED to DICK dated January 7, 1977 3492 68. 3413 69. Compliance Report dated January 6, 1976 1109 70. Compliance Report dated February 12, 1977 1304. 71. 尺 Completion Report dated October 5, 1976 1303 72. Compliance Report dated April 6, 1977 1302 73. Compliance Report dated April 14, 1977 74.R Anti-Cult Legislation dated May 30, 1977 556 557 Compliance Report dated February 10, 1977 75.K 76.R 1316 Chicago/US Mail Log

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LA 47-12230 KRL/clb

One page Hubbard Communications Office, HCO Advice Letter of 16 November 1972-6, captioned Security In Nimeo. The memo pertains to the regulations 20667 R pertaining to the mimeo procedures.

THE ABOVE EVIDENCE WAS REMOVED FROM GREG WILLARDSON'S FILL CABINET #3, DRAWER 2, IN A FOLDER MARKED "FLAG ORDERS"

20658 K

One page entitled Board Policy Letter dated 8'August 1963, Revised and Reissued as BPL 12 February 1977, which is captioned "PLANTS" in Academines, Introduction to "Form 5B". This memo pertains to the steps to be taken when a Government "plant" is suspected of infiltrating the academy.

THE ABOVE EVIDENCE WAS REMOVED FROM GREG WILLARDSON'S FILE CABINET #3, DRAWER 2, IN A FOLDERMARKED "HOO PLS BPLS FEB. 77

20651 R

october 1976, with sub caption SW PGMS EVAL, CONFIDENTIAL, with reference to SNOW WHITE in the upper left hand portion of the memo. The memo refers to various projects, targets, and again makes reference to Snow White, the Hunter 1 FOI program.

2065Z L

Three page memo, Guardian Programme Order, dated 26 February 1977, sub caption Patrick Book Program. This memo pertains to the Patrick book and the efforts to stop this publication.

27 page stapled series of letters, memos, photo-stats, telexes, complaince reports, all of which pertain to a matter classified as Secret, A priority, regarding a Blown Agent. The Agent to whom these series of x documents is referred to RTPC agent in New England.

20153

20154 R

Five pages of Guardian Programme Order dated 22 April 1977, captioned Formal Orange Jice. The memo sets forth Florida State Representative Frank Williams of Starke, Florida, is sponsoring a P.P. Bill for Florida. The memo authors as primary targets to determine who is pushing this mental health type bill.

20655 R

10 page Guardian Programme Order, undated, with wide distribution which pertains to target 3 of the "Strategic Planning Program. There are references to target needs including Congression, committee staff, aids, an analysis to be done on the matter from the Commence and apart or the Commence and the Congressional quarterly. Several portions of this

1A 47-12230 NRL/clb

20656

Trn page Guardian Order dated 23 March 1977, captioned "intelligence Bureau Stat". This document refers to the need for sufficient data to determine whether an individual or group requires handling as a current or potential enemy.

20657

Four page Guardian Programme Order dated 16 April 1977 marked Confidential, with sub caption Florida
Culbrath Bill Pgm. The memo pertains to representative
Culbreath of Fla. who whas filed a bill calling for
the investigation of cults. The memo indicates that the
major target of this matter is to prevent the Culbreath bill from becoming a reality.

7 page Guardian Programme Order dated April 13, 1977, marked Confidential, and captioned Programme - Anti Culb Legislation - Bl. This memo pertains to legislation that would either restrict or inquire in the memo identifies those legislators in 4 states "pushing" for this type of legislation.

THE ABOVE EVIDENCE WAS REMOVED FROM GREG WILLARDSON'S FILE CABINET #3, DRAWER 2, IN A FOLDERMARKED "ISSUES TO FILE".

20653-20649

87 pages of various memoranda contained in file folder captioned "DGI COMM-INCOMPLETE ADMIN & STUDY CYCLES"

20597-20632

139 pages of documents, including memorada, HEW publications, data on drug referred to as Quad, < all of which was contained in a folder captioned GPGMO 124, Project THORN.

20514-20596 Folder captioned GAME which contains 108 pages 20159-20191 which principally pertain to various "products" or studies performed throughout the United Stabs many of which pertain to legal and political matters.

20531-20563 K Folder containing 97 pages of memoranda and reports the majority of which pertain to U.S. time tracks. The folder itself is captioned 'USTT- Revised"

CEDARS DRY O.

2 LA 47-12230

15682P

15687

15688

15689 P

15690 R

15211 R

15692 R

15693

19.81 P. 12. Excerption dated 15/5/77 re Notes on a cult called Spectrum, four pages.

13. Four page Excerption dated 15/5/77 re Leo Simon, ANEY-ACLU Person.

15683 P. 11. 11 page Excerption dated 15/5/77 re
French Armed Movement, Freeminds, BBB Plus \*
CEFM.

15684 R 15. 34 page Excerption dated 14/5/77 re Henry Crampton and the ACLU.

15185 [2 16. Compliance Report dated 21 April 1977 re National Broadcasting Company, 10 pages.

15186 R 17. x7 page Compliance Report dated April 28, 1977.

re ARM Psychiatric Authorities, Log 3650.

18. Two page memo dated 4 March 1977 re Harvey Cox.

19. Two page memo dated 12 April 1977 re Daphne

20. 8 page Compliance Report dated 25 April. 1977 re State Seals.

.21. 13 page Exerption dated 23/4/77 re ARM Investigation Into ACLU/ARM - WFMH.

22. 12 page Excerption dated 23/4/77 re ARM Lawyers and Legal Matters.

23. 7 page Excerption and four page Meroxed attachment dated 23/4/77 re Assorted ARM Actions/Possible Suit.

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24. 9 pages Xeroxed documents dated 28 April 1977 through 20 May 1977 re Berry's World and cartoonist JIM BERRY.

3 LA 47-12230

5699

25. Four page excerption dated 22/3/77 re ROBERT GAIMO letter to US Attorney General.

1695R

26. Ten page Excerption dated 15/5/77 re George Slaughter's Income and Businesses.

5696

27. Guardina Orde dated 10 September 1973 re Guardian Office Alert to obtain all information "The Police and Officials Have On Us."

5697

28. Three page Xeromed "BI Student Interne Routing Form BI Full Hat".

5698

29. Two page memo dated 11 March 1977 captioned Security Clearance For Confidential Cycles.

5699 R

30. Guardian Condition Order dated 7 May 1976 Communication.

5700 R

31. Compliance Report dated 8 June 1976 re CS-G June 4, 1976 Attacks On Cults, two pages.

570¢

32. Two page compliance report dated 8 June 1976 re OP Breakoff PT 1, 2, 4, 5: VT 1, 2, 3: OT 1, 2, 3, 4, 5, 6, 7:

5702

33. Two page Compliance Report dated 8 June 1976 re Doom Program Target Number 27, Project 1, PT2,4,:VT1,4:CH;1;OT1-7 1/2:CH;2;1-5. CH; 3;

5703

34. Nine page report designated Priority A dated January 26, 1976, re Operations On Enemies "Sableman, Orsini and Bob Snyder".

5704

35. Three page memo dated 12 April 1977 re Armed Activities; various devil talks.

5705 R

36. Two page Compliance Report dated 11 April 1977 re names of people who would give evidence against the cults at any inquiry.

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4 LA 47-12230

46.

7706 R Two page Compliance Report dated 7 May 1977 37. re names of state representatives, senators, 水 or legislators and names of parents or anticulters pushing resolution number 93 in the Pennsylvania House of Representatives. 5707 R Two page Compliance Report dated 7 May 1977 38. re directive to interview each of the people pushing resolution number 93 as above. Two page Compliance Report dated 9 May 1977 ·39. re interviews of people pushing bill number 93 (above) outside legislator covertly. Three page Compliance Report dated 10 May 1977 re data on "buttons" for pushers of resolution 40. number 93 and 37 in Pennsylvania House of Representatives. 5710 -One page memo dated April 15, 1977 re recruitment of "An Appropriate Leader" for Armed National 41. Organization. 5711R Four page address list of anti-cult/parent groups \*42. One page handwritten note dated 8 April 1977 5712 R 43. re recruitment of someone into Scarchers Investigative Company, Los Angeles, California, with ten page booklet on that company attached. Two page memo dated 5 April 1977 re APRL Meeting 5713 R 44. on 4 April, attended by Pastor LUKE, President of Freedom of Religion Committee; BARRY FISCHER, HK Lawyer; RALPH WOOD, APRL President; CATHY See #53 LOWERY, Unification Church. One page handwritten memo re Laundering Money 45. Through IFFet-GEFM.

One page handwritten memo dated 16 May 1977 re

disruption of scheduled ARM event.

TA 47-12230

5716 R

47. Two page memo re Operating Targets on GPgmo 1102, particularly Target 10.

5717R

48. One page containing a typewritten plan re disruption of campus religious group.

5718

49. Two page typewritten memo re infiltration of Campus Christian Center captioned "Devil's Council Number 2".

5719R

50. One page handwritten memo dated 6 May 1977 re commendation to RANDY WIMMON re Candidate For The Glue Factory.

5720R

51. Two page typewritten carbon dated 22 September 1976 re exposure to confidential data.

5721R

52. Five page Xeroxed list of G.O. US Staff phone

5722

53. Seven page handwritten report re covert OP I.F. I.F. /I.F.E.T.

5723

54. Seven pages of typowritten and hand written documents re 87 unauthorized expeditures in the U.S. and infiltration of the "Canadian Group".

5724 R

55. Five page memo dated 6 November 1975 re program law and order: "Work Out How, Behind The Scenes To Buy Control of the Selected Company."

5725

56. Eight page typewritten document captioned Branch I Internship Check List.

15726 R

57. Bound booklet titled, PTS&SP Detection Routing Handling and Havingness Pack.

IA 47-12230 rhk/jah July 8, 1977

4041

1092-14050 R

4411-14530 R

0093-10174 R

5137-15512 R

Item 11 - Seven-page document dated 22 June 1977, 020-25 R regarding GERALD HORTON. 026-27 R Item 13 - Envelope captioned, "Eyes Only" containing 1028-30 R two pages dated July 2, 1977. Item 14 - Three-page compliance report dated 7031-33 R 29 June 1977, Item 15 - Five-page document dated 13 June 1977. 9034 R regarding Revised Anti Arm Organization. 9035-36 R 14037 Item 17 - Two-page document dated 6/6/77, regarding : 4038 Justice Department. Item 18 - Three-page document dated June 15, 1977, 14039 Information Report re PETER SAPSFORD. Item 19 - 106 pages entitled, "Material from Congressman BOB BUTERO's office. 4040 Item 20 - 30-page document containing DAPHNE

GREENE's phone index.

File", dated 5/31/77.

O/75-/02/0 R Item 22 - 239 pages entitled, "Continuation of DAPHNE's General Correspondence File"

Item 21 - 282 pages entitled, "First Section of

DAPHNE GREENE'S General Correspondence

2 LA 47-12253 →72— RAM/jah July 8, 1977

15520

Item 3 - Plain brown, legal-sized envelope with notation, "United Press International stationery" containing UPI letterhead stationery and envelopes and SCUPE letterhead stationery.

Item 4 - Legal-sized manila folder captioned,

"Patrick" containing the following

documents:

15521 R

4A - Six page memo dated 8 April 1976 re Patrick Operation.

15522 R

4B - Six page memo dated 26 April 1976 captioned. "Senate Furvey Buttons for Robert J. Dole".

15523K

4C - Cover memo dated 6 May 1976 with 17 pages attached re Current Patrick conviction - OP. BLACKOUT".

15524 R

15525R

Item 6 - Legal-sized manila folder captioned, "AMA OP Phalanx" containing 10-page memo dated May 13, 1976 captioned, "OPERATION PHALANX (AMA)".

15526

15527

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5 LA 47-12230 CCK/LAB 7/8/77

CK 13:

- 72722 38. Letter dated October 29, 1976, to Mrs. RUTH WHITMAN, Brookline, Massachusetts, from ROBERT N. GIAIMO, member of commerce.
- Memo dated 24 Dec 76, RE: ANTI-CULT SCENE, beginning "Dear George", ending "AG PENN", "Butch Clarkson".
- JUSTICE DEPT. RE: AC ACTIVITY. with related memoranda and documents (23 pages).
  - /2725 41. Memo dated 18 Feb 1975, titled COMPLETION REPORT D.O. 1080 TARGET #9, Yolo County DA Files on Scientology, beginning "Dear Jane", ending "Love, Cindy" (> pages).
    - /2726 42. Document labeled Riverside DA Office (not FOI) showing dates of activity, 1974 May 13 through 1975 October 21. (two pages).
- /2727
  43. Letter dated January 26, 1971, from Internal Revenue Service to Church of Scientology of Detroit, Michigan, signed THOMAS Λ. CARDOZA, District Director.
- -/2728 44. Page titled OT Committee Comm Line signed "Love, Marvin Crane".
- -/2729 45. Handwritten page titled Exhibit 15, Incidence of Bribe of Attempted Bribe.
  - /273/ 46. File folder entitled GJROUX, ALBERT P., containing 21 pages.
  - /2744- 47. File folder entitled GLANINY, J. EVERETT, containing one document, two pages in length.
  - 12746 48. File folder entitled GIRPARD, MRS. CINDY, containing one document, two pages in length.
  - 12748 49. File folder entitled GIULIANI, EUDOLPH W., containing four documents, eight pages in length.

3 LA 47-12230 FTC/sbk 7/8/77

12865 30. Memo beginning 11/4/69, last date 1/27/70, 1 page.

12866 R 31. Nemo beginning 12/5/69, ending 2/19/70, 2 pages.

12867 (32. Memo dated 2/10/71, re INTELLIGENCE US WEEKLY REPORT W/E February 4, 1971, to MO from TERRY)

12868 33. Mamo dated September 7, 1972, concerning US
JUCTICE DEPARTMENT DIRECTORY to TM from BR,
with attachment.

12869 R34. Memo captioned JUDGE CARL MCGOWAN SUMMARY, 29 pages.

12870 R35. Memo TIME TRACK ON ROGER ALLEN BROWN, first date July 30, 1946, last date 7/3/73.

12871 R 36. Memo rigst date 3/21/64, last date 9/13/71

12972 37. Memo dated 2/18/75, captioned COMPLETION REPORT
GCO. 1080, Target #9, to JANE from CINDY, 10 pages.

12873 R 38. Memo first date 6/10/74, last date 11/4/74.

12874 R 39. Memo first date 11/4/74, last date 12/19/74

40. Memo first date 12/20/74, last date 3/11/75.

12875
12876
41. Memo dated 1/3/74, WEEKLY REPORT TO PROJECT
XXX FROG, to GREG from VIRGIL, with attachments.

12877 42. Letter dated 6/18/75, re Postal Inspection of C of Washington, D.C. to JEFF from HEBER.

12878 43. Memo dated 4/18/75, re G.O. 1301 Target \$22, to LEIF from TOM, with attachments.

12879 44. Memo dated 12/24/76, re ANTI CULT SCENE, to REORGE from BUTCH CLARKSON.

4 LA 47-12230 FTC/sbk 7/8/77

12830 45. Letter dated 11/16/76, re PAULETTE COOPER, to GARY from MAX, with attachment.

1289146. Memo dated 11/4/76, re REVIN FLANAGAN and Individual Freedom Foundation, to GEORGE from DOUG.

1286247. Memo dated 1/10/77, from AG PENN, re ANTI CULT SCENE PHILADELPHIA AREA, to GEORGE.

12883 48. Letter re A.E. BENNETT, SUMMARY REPORT from July 1969 to October 1976, to SANDY frem, 12 pages unsigned.

/2884 49. Memo dated 9/19/76, re U.S. DEPARTMENT OF JUSTICE, Current Scene to MICHAEL from NIKE, 4 pages

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12885 50. Momo dated 3/30/76. captioned Summary, Estimate National Lines and Base. Anti-Cult Scene. to DICK from CINDY, with attachment.

12886 51. Letter dated 9/11/76, Daily Report, Info Bureau, to KATHY O. from JOE.

12887 52. Letter dated 8/18/76, COMPLIANCE REPORT, re
PAULETTE COOPER, to DICK from GEORGE, with
attachments.

1288853. Letter dated 8/3/76, Re: JUSTICE DEPT.,.
to HENNING from DICK, with attachments.

/188954. Letter dated 4/6/76, re PAULETTE COOPER, to DICK from ARTIE, with attachment.

12890 HEST55. Letter dated 7/22/75, re PC SUIT (NY), to LARRY from RANDY.

12891 56. Telex, dated 1/21/76, re P COOPER.

1.2892 57. Letter dated 11/26/74, re IRA ALLEN BROWN PRO GAM., Completion Report, to CINDY, unsigned.

## 4 LA 47-12230 CV/asi

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2239	57.	Gurrison Book No. 2
1315	58.R	Compliance Report dated April 14, 1977
76	59.R	Investigation Report dated March 3, 1977
75	60.	Time Track for Nathan Dodell
1305	61.R	Compliance Report dated October 5, 1976
1306	62.R	Compliance Report regarding FRANK DANIELS dated April 14, 1977
1301	63.	List of 301's to be done dated September 28, 1976
3497	64.	Compliance Report dated Docember 6. 1976
3496	65.	Summary Report dated January 4, 1977
3495	£6.	Compliance Report dated November 10, 1976
3494	67.	Compliance Report dated February 25, .1977
3992	68.	Note from FRED to DICK dated January 7, 1977 .
3413	69.	Compliance Report dated January 6, 1976
1109	70.	Compliance Report dated February 12, 1977
1304.	71. R	Completion Report dated October 5, 1976
1303	72.	Compliance Report dated April 6, 1977
1302	73.	Compliance Report dated April 14, 1977 .
556	74.R	Anti-Cult Legislation dated May 30, 1977 &
557	75. <b>K</b>	Compliance Report dated February 10, 1977
1316	76.R	Chicago/US Mail Log

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