

DECLARATION OF STACY YOUNG

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3 I, STACY YOUNG, declare as follows:

4 1. I was a member of the Church of Scientology for nearly  
5 15 years, from January 1975 until July 1989. From October 1975  
6 until I left, I was a member of the Sea Organization, the most  
7 dedicated group of Scientologists in the entire organization. I  
8 spent most of my time (from 1978 until 1989) in a highly  
9 confidential section of Scientology management which was known as  
10 the Guardian Office until 1982 and is today called the Office of  
11 Special Affairs.

12 2. During my tenure in Scientology I acquired extensive  
13 knowledge of the counseling methods known as auditing, the  
14 methods of training staff members and public Scientologists, the  
15 methods of dealing with non-Scientologists (known as "wogs") and  
16 former Scientologists, known as enemies or suppressives, and the  
17 administrative and management procedures of the organization.

18 3. The matters set forth herein are of my own personal  
19 knowledge and I could and would competently testify thereto.

20 4. My first experience with Scientology was at the Mission  
21 of Atlanta, Georgia, where I attended a series of introductory  
22 lectures about the mind. I received some basic auditing and took  
23 several basic courses.

24 5. I joined the Sea Organization ("Sea Org" or "SO") at  
25 the Advanced Organization in Los Angeles ("AOLA") in October of  
26 1975. To become a Sea Org member, one must sign a billion-year  
27 contract to confirm one's dedication to Scientology and "clearing  
28 the planet."

1           6. All staff members involved in delivering the  
2 confidential upper levels of Scientology and all staff members  
3 involved in Scientology management must be members of the Sea  
4 Org. They live communally and are under the absolute authority  
5 of the Sea Org command lines 24 hours a day.

6           7. The Sea Org has total authority over all Scientology  
7 and Scientology-related organizations, including all non-profit  
8 and for-profit corporations. It cuts across all corporate  
9 boundaries and can take over any Scientology organization without  
10 notice. Any Scientologist who refuses to submit to Sea Org  
11 authority is declared a "suppressive person" and expelled from  
12 Scientology.

13           8. All Scientologists consider that Scientology is the  
14 only way for Mankind to go free. For a Scientologist this means  
15 getting "exterior" to the physical body and indeed, to the entire  
16 physical universe. Scientologists expect that once they have  
17 attained this state they will be free to travel throughout the  
18 galaxies, freeing others who are in the trap of the physical  
19 universe. What will happen after that is somewhat vague, but no  
20 one has attained this state as yet anyway, so it doesn't really  
21 matter.

22           9. The route out of the physical universe trap is called  
23 "The Bridge to Total Freedom." Every Scientologist is at one  
24 stage or another on this Bridge, and they are expected to get  
25 everyone else on this Bridge as well. The idea is for everyone  
26 on Earth to get exterior to the physical universe. The only  
27 people who aren't included are "suppressives", who don't deserve  
28 to go free.

1           10. The Bridge is composed of a series of auditing  
2 processes, an auditing process being a set of specific questions  
3 and commands. The person who asks these questions and delivers  
4 these commands is called the "auditor." The person who answers  
5 the questions and carries out the commands is the "preclear"  
6 since the first major milestone on the Bridge is called "going  
7 Clear." After one attests to the state of Clear, one moves on to  
8 the confidential upper levels of auditing known as the "Operating  
9 Thetan" levels ("thetan" being Hubbard's term for the person  
10 without his or her body).

11           11. I was a staff member at AOLA from October 1975 through  
12 December 1978. I audited hundreds of hours on public preclears  
13 as well as staff members. I also did many security checks on  
14 staff members. A security check is a method of inducing a person  
15 to confess his or her crimes, particularly crimes against  
16 Scientology.

17           12. In 1977 I was posted as Interne Supervisor at AOLA. In  
18 this capacity I supervised auditors-in-training, known as  
19 internes, to certify them as qualified professional auditors. To  
20 perform this function I had to understand auditing procedures  
21 precisely from the most basic processes to the advanced processes  
22 and procedures of Class 6 and Class 8, which are advanced levels  
23 of expertise, so that I could recognize whether or not the  
24 internes were conducting themselves as proper auditors.

25           13. As a result of my experiences at AOLA I acquired a high  
26 level of expertise as a "tech terminal" meaning one who is  
27 knowledgeable about the technical application of Scientology  
28 counseling and training methods.

1           14. At the end of 1977 I transferred to the United States  
2 Guardian's Office ("USGO") in Los Angeles. I was a staff member  
3 at the USGO from January 1978 through January 1982. This  
4 section of Scientology, now called the Office of Special Affairs,  
5 is responsible for dealing with all external public relations,  
6 all matters relating to civil litigation or criminal matters, all  
7 governmental relations such as the IRS, and all critics of  
8 Scientology.

9           15. Because of my technical background I was posted as the  
10 Organizing Officer ("Org Officer") for the Public Relations  
11 Bureau and, later, as the Org Officer for the entire Guardian's  
12 Office. As the Org Officer, my functions included the handling  
13 of all personnel and organizational matters, such as correcting a  
14 staff member who made mistakes, taking care of staff members who  
15 were sick or upset or in trouble, recruiting new people for  
16 staff, and promoting or demoting staff members as needed. I was  
17 also responsible for the establishment and proper administration  
18 of all the Guardian's Office personnel throughout the Unite  
19 States. Because the Guardian's Office oversaw certain aspects of  
20 the administration of all other Sceintology organizations, I  
21 became very familiar with the overall structure of Scientology  
22 and how the various organizations interact with each other and  
23 with the outside world.

24           16. In early 1982, I was transferred to a very high-level  
25 section called Special Project and was assigned as a PR Assistant  
26 under my husband, Robert Vaughn Young. In this position I became  
27 familiar with L. Ron Hubbard archives material, which was the  
28 complete collection of all of Hubbard's personal papers,

1 including diaries, letters, and notes that he had kept from a  
2 very early age.

3 17. Several months later Special Project became what is now  
4 Author Services, Inc., a for-profit company whose ostensible  
5 purpose was to be L. Ron Hubbard's literary agency. I was taken  
6 out of PR and made the Organizing Officer for ASI in April 1982.  
7 In this position I worked directly for David Miscavige, who was  
8 Chairman of the Board of ASI, to carry out his orders concerning  
9 the staff of ASI.

10 18. David Miscavige, known as DM, has been the head of  
11 Scientology since 1981. His loyalty to L. Ron Hubbard and  
12 Scientology is absolute and he is utterly ruthless about  
13 maintaining his power. He moved the seat of power from ASI to  
14 the Religious Technology Center (RTC) in 1987, during a period of  
15 time when the IRS was investigating ASI's ties to the non-profit  
16 corporations of Scientology. At this point he appointed himself  
17 Chairman of the Board of RTC, which is his current title.

18 19. Although ASI was established as a for-profit, non-  
19 religious corporation, in reality while DM was Chairman of the  
20 Board of ASI, the staff of ASI ran the entire Scientology  
21 network. ASI had complete control over the management of all  
22 Scientology orgs and missions, all Office of Special Affairs  
23 activities, all Scientology litigation, all transfers of funds  
24 between church accounts and LRH accounts, every aspect of the  
25 life of anyone who was a Scientologist, whether staff or public.  
26 These powers were moved to RTC in 1987, as explained above.

27 20. Because of my experience in ASI I am familiar with the  
28 day-to-day activities and procedures of the highest levels of

1 management of Scientology.

2 21. I have firsthand knowledge of the establishment of the  
3 corporate structure of Scientology as it now exists, having  
4 worked with the staff who were responsible for creating it. The  
5 purpose of this activity was to create an impenetrable, legally  
6 defensible network of corporations such that neither the IRS nor  
7 any other legitimate agency of government could "pierce the  
8 corporate veil" of Scientology organizations, thereby freeing  
9 Scientology management to transfer funds between organizations  
10 without concern for the law.

11 22. In September 1982 I was assigned to the Rehabilitation  
12 Project Force ("RPF"), the Scientology version of a prison camp.  
13 I was assigned to the RPF because I was openly critical of DM's  
14 coercive and degrading treatment of staff members. I was on the  
15 RPF in Los Angeles for eight months.

16 23. As a result of this experience I am familiar with the  
17 absolute control which the highest levels of Scientology  
18 management have over the behavior and thought processes of every  
19 Sea Org member.

20 24. There is only one way for a good Sea Org member to  
21 behave and think and any deviation from this is punished  
22 immediately and severely. In turn, it is the responsibility of  
23 all members of Sea Org management to bring about the same pattern  
24 of behavior and thought in all Scientologists under their  
25 authority, regardless of whether those under their authority are  
26 part of the "church" or the various "secular" arms of  
27 Scientology. This distinction means nothing within Scientology.  
28 It was created purely to facilitate dissemination of Scientology

1 and to fend off Scientology's "enemies" such as the IRS.

2 25. From May 1983, when I was allowed off the RPF, until  
3 July 1984 I was posted as Course Supervisor at the International  
4 Training Organization (ITO) in Los Angeles. From this position I  
5 trained hundreds of fledgling Scientology executives from all  
6 over the world on the administrative and management policies of  
7 L. Ron Hubbard known as the Organization Executive Course, or  
8 OEC. As a result of this experience I am very familiar with the  
9 administrative policy of Scientology and know that Hubbard  
10 formulated it purely to facilitate the establishing and  
11 organizing of his worldwide network of Scientology organizations.

12 26. In August 1984 I was transferred back to the PR  
13 Division of the Guardian's Office, which by that time had been  
14 renamed the Office of Special Affairs. My primary functions were  
15 as a writer and editor for FREEDOM Magazine, a Scientology  
16 publication created to serve as a vehicle for attacking  
17 individuals and groups who were perceived as threats to  
18 Scientology.

19 27. In 1985 I personally created a nonprofit, non-tax-  
20 exempt corporation called North Star Publishing for the purpose  
21 of moving FREEDOM Magazine away from the Church of Scientology.  
22 I did this so that FREEDOM would have more credibility and not be  
23 seen as a mouthpiece of Scientology. This corporation was active  
24 until 1987, and during the time I ran North Star I gained  
25 experience in interfacing with the business world while running a  
26 purely Scientology organization. I am familiar with the legal,  
27 financial and public relations sleight of hand required by  
28 Scientology corporations that must deal with the non-Scientology

1 business world.

2 28. In 1987 North Star Publishing was disbanded and the  
3 staff were reassigned to OSA. My primary functions were again  
4 writing and editing. I wrote for FREEDOM Magazine, Scientology  
5 Today, and the Crusader.

6 29. In Scientology every aspect of PR is directed toward a  
7 particular "public." FREEDOM Magazine was directed toward  
8 government officials, legislators, heads of businesses, and other  
9 key "publics" who needed to be brought into agreement with  
10 Scientology's views of the key attackers of Scientology, such as  
11 the IRS, psychiatrists, etc. Scientology Today was directed all  
12 Scientologists and was intended to promote OSA as a powerful and  
13 successful arm of Scientology that was winning the war against  
14 the enemies of Scientology. The Crusader was a publication  
15 directed toward religious leaders and ministers of other  
16 religions and was intended to create allies for Scientology in  
17 the religious community.

18 30. As a writer and editor in the PR Division of OSA my  
19 primary responsibility was to "communicate the correct message to  
20 the correct public."

21 31. As a result of my experience as a writer for these  
22 different Scientology publications, I am familiar with  
23 Scientology's practice of changing its story for whatever public  
24 it is trying to reach. Often I rewrote the same basic story for  
25 each publication, completely changing the wording and overall  
26 thrust of the story to appeal to the different publics that were  
27 going to read it.

28 32. As a writer in OSA I was also responsible for writing



1 rebuttals of negative stores about Scientology that were  
2 published in various newspapers across the country. I was also  
3 assigned to write rebuttals of books that were published that  
4 were negative about Hubbard and Scientology. As a result of this  
5 work I became very familiar with the policies and practices of  
6 Scientology with regard to individuals and groups that criticize  
7 the organization. I have personal knowledge that the practices  
8 which were formerly called "fair game" continue to be employed  
9 although the term "fair game" is no longer used. These tactics  
10 are laid out in many of the key policies that are studied and  
11 applied by staff of OSA.

12 33. In July, 1989 my husband and I left Scientology. We  
13 lived in San Diego from 1989 until August, 1991, at which time we  
14 moved to Newport Beach. We are currently living in Corona del  
15 Mar, California.

16 34. As a result of my experiences in Scientology, I am  
17 qualified to discuss the policies, procedures and practices of  
18 this organization, including its relationship to Sterling  
19 Management which is important in this case.

20 35. Few people are qualified to act as experts on the  
21 subject of Scientology. Unfortunately, it is not a subject that  
22 one can learn by taking a course at the local university. It can  
23 only be understood by experiencing it, as I did for 15 years.

24 36. I believe it is crucial for outsiders to begin to  
25 understand what Scientology really is, what motivates its  
26 members, how the leadership views non-Scientologists and critics  
27 of Scientology, how Scientologists manipulate the courts for  
28 their own ends, and the role played by Scientology front groups

1 in their overall plan to take over the world. I have agreed to  
2 act as an expert witness because I think it is important for  
3 people to begin to understand the true nature of this  
4 organization. But by telling the truth about Scientology, I am  
5 making myself a target of their Fair Game doctrine, which  
6 endangers not only me but my family as well.

7 37. I have information which the leaders of the Church of  
8 Scientology will do anything to keep me from discussing publicly.  
9 I know this to be true because I have firsthand knowledge of fair  
10 game being practiced on Scientology critics, including former  
11 Scientologists like myself and people who have never been in  
12 Scientology. I have firsthand knowledge of incredibly harassive  
13 and destructive actions being taken against people to silence  
14 their criticism of the Church. Scientology representatives claim  
15 that they do not practice fair game any more, but that is a lie.

16 38. My husband, Robert Vaughn Young, is also a target of  
17 their fair game practices because he is speaking out about the  
18 abuses he observed and experienced himself during his 20 years in  
19 Scientology.

20 39. Scientology operatives have begun to contact people  
21 from our past for the purpose of harassing and intimidating us  
22 into being silent about what we know.

23 40. I know they have gone through our trash as recently as  
24 Friday, September 10. Both my husband and I are personally  
25 aware, from our own experience in the organization, that stealing  
26 trash is part of the Church of Scientology's intelligence tactics  
27 against critics.

28 41. Based on my own experience, I know that they are

1 looking for envelopes, letters, bills, notes or anything else  
2 with names, addresses and/or phone numbers they can use to harass  
3 us. I have personal knowledge that they take names from trash  
4 and call them to get information and to spread rumors about their  
5 critics. I know they are looking for any other documents they  
6 can use to harm or harass or intimidate us.

7 42. The Office of Special Affairs (OSA), formerly the  
8 Guardian's Office, is the section of Scientology under the  
9 immediate direction of the Religious Technology Center (RTC),  
10 that is responsible for silencing critics of Scientology. Within  
11 OSA there is an intelligence section, called the Information  
12 Division or Info, which is responsible for gathering derogatory  
13 information about critics which can then be used against them.  
14 (The FBI raided this section of Scientology in 1977, confiscating  
15 thousands of documents which implicated the highest levels,  
16 including Hubbard and his wife, in criminal activities and  
17 resulted in criminal convictions against 11 Sceintology  
18 operatives, including Hubbard's wife.) This information  
19 gathering is done either by intelligence staff or by private  
20 investigators hired by the law firm of Bowles and Moxon, which is  
21 part of OSA. Private investigators are used when the actions are  
22 particularly dirty, so that if they are caught, the church  
23 leadership can deny all knowledge of it and also so that  
24 everything they do can be protected as attorney work product.

25 43. Scientology leaders repeatedly insist that the people  
26 who used to intimidate and harass critics have all been kicked  
27 off staff and that these kinds of dirty tricks are no longer  
28 practiced by Scientology against its perceived enemies, but this

1 is not true.

2 44. An example of these tactics has already been filed as  
3 an exhibit in the case of Sterling v. CAN. It is a 1987 letter  
4 sent from Joan Heller, the Legal Officer (an OSA position) of  
5 Sterling Management Systems, to her senior at WISE [World  
6 Institute of Scientology Enterprises] International for approval  
7 before sending it out to a dissatisfied Sterling client who had  
8 requested a refund. (Anyone who asks for a refund is immediately  
9 labeled a suppressive person, or enemy of the Church.) In the  
10 letter, Ms. Heller makes it clear that if this person criticizes  
11 Sterling (a Scientology front group) any further, she will expose  
12 that he has been cheating on his income taxes:

13 "A cursory review of your folder . . .  
14 shows that you actually make more money than  
15 you report to the IRS and that you are  
16 skimming around \$25,000.00 off the top prior  
17 to reports.

18 "This information is only what we have  
19 found so far. If this matter went public, of  
20 course, we would have to pursue what's behind  
21 this attack and expose any other crimes  
22 found. It is our experience that those who  
23 attack us, after all the things we try to do  
24 for them, have something to hide. We are  
25 more than willing to review this publicly if  
26 you continue your slanderous and defamatory  
27 accusations."

28 45. My husband and I have also begun to receive an

1 inordinate number of phone calls, particularly very late at  
2 night, in which the caller simply hangs up without saying  
3 anything. This is another form of harassment and intimidation by  
4 church operatives which has been experienced by many critics of  
5 Scientology.

6 46. Former IRS Commissioner Donald Alexander mentioned this  
7 in an October 24, 1993 article. In it he was quoted as saying,  
8 "I hope the IRS did not give in to intimidation. By intimidation  
9 I mean 2 o'clock in the morning telephone calls."

10 47. We have received calls as late as 4:00 in the morning  
11 in which when the phone is answered, the caller simply hangs up.  
12 Apparently a church operative has been ordered to call us at  
13 10:00 p.m., 1:00 a.m., and 4:00 a.m. as this is when the calls  
14 occur.

15 48. The Scientologists claim they no longer treat people as  
16 fair game, but this categorically untrue.

17 49. Fair game was defined by Scientology founder L. Ron  
18 Hubbard in 1965 as "without rights for self, possessions or  
19 position, and no Scientologist may be . . . punished for any  
20 action taken against a Suppressive person or Group during the  
21 period that person or group is 'fair game'."

22 50. Hubbard defined "suppressive person or group" as "one  
23 that actively seeks to suppress or damage Scientology or a  
24 Scientologist by Suppressive Acts. . . A truly Suppressive  
25 Person or Group has no rights of any kind and actions taken  
26 against them are not punishable."

27 51. In Scientology, one is labeled "suppressive" for  
28 exercising basic rights which other US citizens take for granted.

1 Scientologist give up their rights to freedom of speech, freedom  
2 of the press, and freedom of association. A Scientologist is  
3 declared "suppressive" and becomes a target of fair game if he or  
4 she is publicly critical of Scientology in any way, if he or she  
5 writes anything critical or in any way negative about Scientology  
6 in a newspaper or magazine, or if he or she communicates in any  
7 way - much less meets with - someone else who has been publicly  
8 critical of Scientology.

9 52. In a later version of the policy letter that defined  
10 the above terms, Hubbard left out any mention of fair game and  
11 simply said that anyone declared suppressive would not have any  
12 rights as a Scientologist. What must be understood, however, is  
13 that in the world of Scientology, if one has no rights as a  
14 Scientologist, then one has no rights at all.

15 53. In the late 1960's Hubbard realized that some of his  
16 public statements were not good for Scientology's public  
17 relations, and he began to speak more euphemistically. This is  
18 how the cancellation of fair game came about. But Hubbard made  
19 it clear in the cancellation itself that he was doing it purely  
20 for public relations purposes:

21 "The practice of declaring people FAIR  
22 GAME will cease. FAIR GAME may not appear on  
23 any Ethics Order. It causes bad public  
24 relations."

25 "The P/L does not cancel any policy on  
26 the treatment or handling of an SP."

27 All he did was to order his followers to stop publishing  
28 anything with the words FAIR GAME on it. He specifically told

1 them to continue to apply of his policies on the "treatment and  
2 handling of an SP." It was purely a matter of semantics. He  
3 felt that only the initiated could understand why Scientology's  
4 enemies must be tracked down and eliminated; therefore, he simply  
5 stopped talking about it with the uninitiated. Certainly the  
6 cancellation of fair game did not alter Scientology doctrine one  
7 iota. But the experience taught Hubbard a lesson; he became more  
8 careful about his and Scientology's public image.

9 54. Indeed, Hubbard was a master of the "acceptable truth."  
10 As he wrote in a 1970 PR policy:

11 "Handling truth is a touchy business . . .  
12 You don't have to tell everything you know -  
13 that would jam the comm[unication] line too.  
14 Tell an acceptable truth."

15 "Agreement with one's message is what PR is  
16 trying to achieve. Thus the message must  
17 compare to the personal experience of the  
18 audience.

19 "So PR becomes the technique of communicating  
20 an acceptable truth - and which will attain  
21 the desirable result."

22 55. He was also a master at getting others to do his dirty  
23 work. This is how it came about that 11 of his key henchmen  
24 (including his own wife) went to jail for crimes he ordered them  
25 to commit, but there was not enough evidence to indict Hubbard  
26 himself. Of course there wasn't. He was far too clever to get  
27 caught.

28 56. One of the tricks Hubbard used was to issue his

1 sensitive orders as if he were explaining the tactics of  
2 Scientology's "enemies."

3 In a 1969 policy letter entitled "Targets, Defense," one of  
4 the errors he pointed out that had nearly put Scientology out of  
5 business was "not learning enemy tactics and using and bettering  
6 them."

7 With hints like this, he was then free to couch his written  
8 or verbal instructions in reverse terms. For example, in 1969 he  
9 gave explicit instructions on how to conduct covert intelligence  
10 data collection but wrote it as an explanation of how the enemies  
11 of Scientology carried out covert operations against the church.

12 57. He made it clear that he was not to be implicated in  
13 the covert actions his intelligence arm carried out:

14 "In using such data or documents as are  
15 furnished, there is a danger of exposing the  
16 source of them or the agent so one usually  
17 falsifies the source and takes other measures  
18 to obscure both that one is dealing with  
19 Intelligence and that the agent or case  
20 officer had any connection with it."

21 Further in the same written briefing, Hubbard mapped out what he  
22 wanted from his covert operations section:

23 "Essentially a covert operation is  
24 intended to embarrass, discredit or overthrow  
25 or remove an actual or possible opponent."

26 "It is a small war carried on without  
27 its true source being disclosed. . . ."

28 "It follows all the rules of war but



1 uses propaganda psychological effect surprise  
2 shock [sic], etc. to achieve its ends."

3 Finally, Hubbard outlined what he wanted done to his enemies:

4 "We remove his agents and vanquish his  
5 troops and we directly attack his central  
6 group. That's sound tactics. . ."

7 "Our direct assault will come when they  
8 start to arrest his principals and troops  
9 (already begun)."

10 "Our total victory will come when we run  
11 his organizations, perform his functions and  
12 obtain his financing and appropriations."

13 58. After the FBI raided the church in July 1977, every  
14 Guardian's Office staff member, including myself, was ordered to  
15 participate in massive shredding parties. Every single piece of  
16 paper that incriminated Hubbard in any way was either shredded  
17 completely or the incriminating bits were sliced out with a razor  
18 blade.

19 59. Hubbard always had a very small number of lieutenants  
20 who were utterly, unquestionably loyal to him. He counted on his  
21 lieutenants for two things: to carry out his orders to the  
22 letter, and to maintain his image as a humanitarian.

23 60. This idea of Hubbard as a humanitarian would be  
24 ludicrous if it were not so dangerous. It is dangerous because  
25 people are lured into Scientology believing they are becoming  
26 part of a charitable organization founded by a humanitarian  
27 genius. In fact, the Scientology empire is a mirror image of a  
28 man who was evil, manipulative, megalomaniac, vindictive, cunning

1 and psychopathic.

2 61. I know this to be true because I am one of only a  
3 handful of people who have read Hubbard's personal archives in  
4 its entirety. My husband was assigned to take care of these  
5 archival materials after Gerald Armstrong left the church at the  
6 end of 1981, and I was assigned as my husband's assistant.  
7 Because Gerald had left after reporting that some of the  
8 documents would expose Hubbard as a liar and a charlatan, our  
9 task was to become thoroughly familiar with all of the materials  
10 so that we could make sure Hubbard's image remained intact.

11 Many of the documents I found in Hubbard's personal archives  
12 made me physically ill, because they showed him to be so  
13 different from everything I had been led to believe about him.

14 62. Gerald Armstrong turned over thousands of these  
15 documents to his attorney, Michael Flynn, after he left the  
16 church in 1981. The church sued Armstrong to force him to return  
17 the material, but after hearing testimony from a number of former  
18 members and reviewing the materials, Los Angeles Superior Court  
19 Judge Paul G. Breckenridge refused to order the documents  
20 returned. In his decision, Judge Breckenridge provided one of  
21 the most accurate analyses of Hubbard and Scientology ever  
22 recorded:

23 "The organization clearly is  
24 schizophrenic and paranoid, and this bizarre  
25 combination seems to be a reflection of its  
26 founder. The evidence portrays a man who has  
27 been virtually a pathological liar when it  
28 comes to his history, background and

1 achievements. The writings and documents in  
2 evidence additionally reflect his egoism,  
3 greed, avarice, lust for power, and  
4 vindictiveness and aggressiveness against  
5 persons perceived by him to be disloyal or  
6 hostile."

7 63. Shortly after the Breckenridge decision was issued, a  
8 judge in the High Court in London described Scientology as  
9 "immoral, socially obnoxious, corrupt, sinister, and dangerous"  
10 and called the behavior of Hubbard and his inner circle "grimly  
11 reminiscent of the ranting and bullying of Hitler and his  
12 henchmen."

13 64. Yet Hubbard was a master showman who knew how to charm  
14 his audience. In hundreds of taped lectures and thousands of  
15 published documents, he portrayed himself as a man who wanted  
16 nothing more than to help man free himself of all misery and  
17 insanity. He portrayed the Scientology organization as the only  
18 group that could save the world from the evil forces that were  
19 seeking to enslave it and he presented himself as the only person  
20 in the world who could safely lead humanity out of this terrible  
21 trap. That he was able to pull off this hoax so successfully -  
22 and that even though he is dead the fraud is actually continuing  
23 - is a testimony to Hubbard's astonishing talents of manipulation  
24 and deceit.

25 65. The people who are running Scientology now are  
26 Hubbard's most fanatical followers, his inner circle. He  
27 carefully gathered around him in his inner circle only his most  
28 loyal and dedicated followers, people who believed in him

1 completely and would literally do anything he told them to. He  
2 made it a fundamental part of the Scientology philosophy that  
3 anyone who criticized him or his organization, and especially any  
4 member of the inner circle who betrayed them, was a criminal who  
5 was out to destroy him or the group because they were afraid  
6 Scientology would find out about their crimes. He instilled in  
7 his hand-picked lieutenants his own rabid paranoia and ruthless  
8 vindictiveness.

9       66. When he died in 1986 the responsibility for continuing  
10 this bizarre crusade fell to David Miscavige, who has spent  
11 millions of dollars to promote the Church of Scientology as  
12 simply an "applied religious philosophy."

13       In fact, these people fully intend to take over the world,  
14 as Hubbard directed them to do in "Targets. Defense":

15               "The vital targets on which we must invest  
16               most of our time are:

17               T1. Depopularizing the enemy to the point of  
18               total obliteration.

19               T2. Taking over the control or allegiance of  
20               the heads or proprietors of all news media.

21               T3. Taking over the control or allegiance of  
22               key political figures.

23               T4. Taking over the control or allegiance of  
24               those who monitor international finance and  
25               shifting them to a less precarious finance  
26               standard. . . .

27               "Our only justification for doing these  
28               things is that Scientology is the only game

1           where everyone wins."

2           67. This is not the language of a religious leader.

3 Indeed, Hubbard patterned his Sea Organization on a military  
4 model and made it clear that Scientology was at war. In policy  
5 after policy he repeated this, such as a 1969 policy entitled  
6 "Battle Tactics":

7           "If you uniformly apply the tactics and  
8 strategy of battle to the rows we get into,  
9 press or legal or public confrontation, you  
10 will win . . .

11           "If we and they are considered as two  
12 hostile and opposing nations at war, then a  
13 huge array of tactics and strategy become  
14 visible. . .

15           In this case it is not safe to hope for  
16 any halfway win. We must ourselves fight on  
17 a basis of total attrition of the enemy. So  
18 never get reasonable about him. Just go all  
19 the way in and obliterate him. . ."

20           68. What is particularly frightening to me is that I see  
21 the Scientologists running roughshod over the judicial system of  
22 this country. I see them getting better and better at their  
23 sleight of hand, blithely holding up their masks of religiosity  
24 while laughing amongst themselves at the gullibility of the  
25 Court.

26           69. In fact, the current leaders of Scientology hold the  
27 justice system of the United States in utter contempt, as Mark C.  
28 Rathbun, one of the highest-placed executives in Scientology,

1 made clear in a declaration he filed on January 29, 1992:

2 "A reference to a person being 'fair game' is  
3 a direct reference to what individuals who  
4 cannot have access to the Scientology justice  
5 system are likely to receive at the hands of  
6 the justice systems extant in society.

7 Compared to Scientology ethics and justice  
8 procedures, lay justice procedures are, in  
9 fact, barbaric."

10 If Scientology leaders view the courts as "barbaric",  
11 clearly their motive in filing so many lawsuits is purely to  
12 harass. If the court system has any value at all, it is to the  
13 degree that it can be manipulated to further Scientology's own  
14 purposes.

15 70. The most spectacular record of Scientology's contempt  
16 for "lay justice procedures" can be found in the 284-page  
17 Stipulation of Evidence in the 1979 case of United States of  
18 America v. Mary Sue Hubbard, et al. This case was the result of  
19 the FBI's 1977 raids on several locations of the Guardian's  
20 Office, the intelligence arm of Scientology run by Hubbard's  
21 wife, Mary Sue. This document and the Sentencing Memorandum in  
22 the companion case of U.S. v. Jane Kember and Morris Budlong  
23 clearly illustrates Scientologists' contempt for the law and  
24 arrogant belief in their right to deceive the United States  
25 government and the courts.

26 According to these documents, the crimes revealed in the  
27 documents seized by the FBI included "the execution of smear  
28 campaigns and baseless lawsuits for the sole purpose of

1 destroying private individuals who had attempted to exercise  
2 their First Amendment rights to freedom of expression; the  
3 framing of private citizens who had been critical of Scientology,  
4 including the forging of documents which led to the indictment of  
5 at least one innocent person; and the violation of the civil  
6 rights of prominent private citizens and public officials. . ."

7       It was clear to the government that the church had filed  
8 lawsuits "for the sole purpose of financially bankrupting its  
9 critics and in order to create an atmosphere of fear so that  
10 critics would shy away from exercising their First Amendment  
11 rights secured them by the Constitution. The defendants and  
12 their cohorts launched vicious smear campaigns, spreading  
13 falsehoods against those they perceived to be enemies of  
14 Scientology in order to discredit them and, in some instances, to  
15 cause them to lose their employment . . . To these defendants and  
16 their associates . . . anyone who did not agree with them was  
17 considered to be an enemy against whom the so-called 'fair game  
18 doctrine' could be invoked. . ."

19       71. This contempt for the law and arrogance continues  
20 unabated to this day, although the current leadership under the  
21 direction of David Miscavige, and many of his henchmen such as  
22 Mark Rathbun, would have the courts - and the IRS - believe  
23 otherwise.

24       This arrogance stems, in part, from the fact that the  
25 Scientology leaders are in the habit of saying whatever they want  
26 to the courts, believing they can get away with it because there  
27 is no one who can refute them.

28       72. In an article in the October 24, 1993 St. Petersburg

1 Times, the following information was quoted from documents  
2 submitted by Scientology to the IRS:

3 "The Guardian's Office, set up to harass the  
4 government, has been shut down, the Church of  
5 Scientology says. 'Any individuals who were  
6 found at that time to be on staff were  
7 dismissed and informed never to apply for re-  
8 employment,' the Scientology lawyers wrote.  
9 New hires are checked against a list of  
10 former Guardian's Office criminals' the  
11 lawyers wrote."

12 This claim, which was apparently instrumental in gaining  
13 Scientology's recent tax-exempt status, is astonishing in light  
14 of the ease with which it can be proven false by anyone familiar  
15 with the histories of many current high-level Scientology  
16 management staff members. The truth is that only the name of the  
17 Guardian Office was changed; it was never shut down. The same  
18 organization, run on the same policies and staffed by many of the  
19 same people, is now called the Office of Special Affairs. I was  
20 there when David Miscavige's group of "Commodore's Messengers"  
21 arrived in the Guardian's Office and announced that they were  
22 taking over. I was there when they announced that all staff  
23 members of the Guardian's Office would henceforth be required to  
24 be members of the Sea Organization, and I was also there when the  
25 name of the Guardian's Office was changed to the Office of  
26 Special Affairs.

27 73. Some staff members left because they did not want to  
28 join the Sea Organization and have their lives controlled 24



1 hours a day by Miscavige and his "Commodore's Messengers." A few  
2 staff members, like Fred Hare and Jimmy Mulligan, who had been  
3 involved in the illegal activities but had not been caught, were  
4 ordered off staff so they could not be an embarrassment to  
5 Scientology in the future. But for the most part, Guardian  
6 Office staff members continued their activities without  
7 interruption.

8       74. Start with Heber Jentzsch, a well known Guardian Office  
9 staff member for at least a decade, who is now President of the  
10 Church of Scientology International and a staff member of the  
11 Office of Special Affairs International.

12       75. Kurt Weiland, a long-time Guardian Office staff member  
13 in Germany, is now the Commanding Officer of the Office of  
14 Special Affairs International, the highest position in that  
15 organization.

16       76. Many other Guardian Office staff members became Office  
17 of Special Affairs staff, including Linda Hamel, Allen Hubbert,  
18 Gail Armstrong, John Carmichael, Jeff Quiros, and others. David  
19 Butterworth and Debbie Hubbert Rossouw, both of whom became OSA  
20 staff, were actually senior to the GO as Mary Sue Hubbard's  
21 personal GO liaisons before David Miscavige took over.

22       77. Responsibilities that were formerly held by Mary Sue  
23 Hubbard and the most senior Guardian Office executives are now  
24 carried out by the Religious Technology Center (RTC), which  
25 directs all Office of Special Affairs activities. Some Guardian  
26 Office staff were promoted to RTC after the current leadership  
27 came to power.

28       78. Warren McShane, for example, was a Guardian Office

1 staff member who was promoted to RTC and made responsible for  
2 securing all of the copyrights and trademarks of Scientology.

3 79. Brian Andrus was another Guardian Office staff member  
4 who was promoted to RTC. Brian was cited in the Stipulation of  
5 Evidence as having been directly involved in the attempted cover-  
6 up of criminal activities. The following passage is illustrative  
7 of Brian's role:

8 "On May 7, [1977] at approximately 6  
9 p.m., Brian Andrus, Peter Alvet, Information  
10 Bureau official Chuck Reese and two  
11 bodyguards visited Mr. Meisner and told him  
12 that he was to be moved to another apartment.  
13 Mr. Meisner refused to leave, threatening to  
14 cause a commotion if forced to do so. The  
15 two guards handcuffed him behind his back,  
16 gagged him and dragged him out of the  
17 building. Outside, they forced him onto the  
18 back floor of a waiting car. In the car one  
19 of the guards held Mr. Meisner down with his  
20 feet. Mr. Meisner was taken to an apartment  
21 which he later learned was located at 3219  
22 Descanso Drive, in Los Angeles, California.  
23 After Messrs. Andrus and Alvet left, three  
24 guards remained in the apartment with Mr.  
25 Meisner. . . ."

26 80. These are just a few examples of Guardian Office staff  
27 who went on to become executives of the Office of Special Affairs  
28 and Religious Technology Center. The current Scientology

1 leadership, including David Miscavige, Marty Rathbun and Lynn  
2 Farney, are aware of the Guardian Office background of every  
3 single one of these personnel.

4 81. There is one other former Guardian Office staff member  
5 who deserves special attention.

6 Kendrick (Rick) Moxon, currently an attorney with the firm  
7 of Bowles and Moxon, (a law office which is actually part of the  
8 Office of Special Affairs), was named as an unindicted co-  
9 conspirator in the U.S. v. Mary Sue Hubbard case and is cited in  
10 the Stipulation of Evidence for his role in covering up the  
11 illegal activities which led to the indictments.

12 The record shows that in 1976, Moxon was the Assistant  
13 Guardian for Legal Bureau in Washington, D.C. He was served with  
14 a subpoena for handwriting samples of another Guardian Office  
15 staff member, Michael Meisner, suspected of breaking and entering  
16 several government offices and on whom a warrant had been issued.  
17 A week later Moxon submitted an affidavit with nine pages of  
18 handwritten material, stating that the nine pages were Meisner's  
19 handwriting. According to the record, it was later revealed that  
20 "Mr. Moxon had been directed to supply the government with faked  
21 handwriting samples in lieu of Mr. Meisner's true handwriting  
22 exemplars."

23 Moxon was simply doing what any loyal Scientologist would  
24 do. Moxon was lying under oath to protect Scientology.

25 82. Today, Kendrick Moxon is directing most, if not all, of  
26 the lawsuits that have been brought by the church against its  
27 critics. It was Moxon who interrogated both my husband and  
28 myself in deposition on October 23, although he is not even an

1 attorney of record in the case for which we were deposed. It  
2 doesn't matter. That case was irrelevant to Moxon's actual  
3 objectives anyway. He was only there to conduct a fishing  
4 expedition, which he did despite repeated objections of counsel  
5 that his questions were utterly irrelevant to the case at hand.  
6 He was there to get us to make statements that could then be  
7 quoted and used to discredit us (which he immediately tried to do  
8 in a totally unrelated case). He was there to get information  
9 out of us that could be used to harass and intimidate us, which  
10 is exactly what began to happen immediately thereafter.

11 83. Moxon has been manipulating the courts since the 1970's  
12 and he is now doing so as an attorney licensed by the State of  
13 California. He is one of David Miscavige's key henchmen. He  
14 hires many of the private investigators who are directed to "find  
15 the crimes" of Scientology's critics.

16 84. The Scientologists consider themselves to be above the  
17 law; only the codes of Scientology are valid. They use their  
18 religious status as a shield which protects them from the normal  
19 restraints and inhibitions all other US citizens are expected to  
20 adhere to. Thus, staff members are routinely forced to go  
21 without sleep for days at a time, without decent food, there are  
22 instances of physical abuse against staff members, parents are  
23 not allowed to see their children, spouses are separated from  
24 each other for months at a time.

25 85. It is extremely difficult to document these  
26 accusations, because no current member will admit that these  
27 conditions exist (if they did, they would be assigned to the RPF  
28 or declared immediately) and before any outsider is allowed to

1 inspect, any and all evidence of such conditions is cleaned up or  
2 covered up. The only ones who can testify about these matters  
3 are former Scientologists, but they are subjected to such  
4 relentless harassment and intimidation if they do speak up, that  
5 very few people are willing to do so.

6 86. The people in charge of Scientology are merciless in  
7 their treatment of those who don't measure up to the Scientology  
8 code of conduct, whether the individual is inside or outside of  
9 the organization. Many of these Scientology executives have  
10 never known any other life except within the narrow confines of  
11 the Scientology world. Many, like the most senior Scientologist,  
12 David Miscavige, have little or no formal education and have  
13 never heard or read of any other reality than the one created by  
14 Hubbard.

15 87. Yet, wrapping themselves in the cloak of freedom of  
16 religion, they are utterly free to treat the staff as abusively  
17 as they choose, secure in the knowledge that no one will punish  
18 them because no one can touch them legally. Furthermore, as long  
19 as a staff member remains a Scientologist he or she is expressly  
20 forbidden to report abuses to the authorities. It is only by  
21 leaving Scientology that one is free to talk about the abuses  
22 that go on. Unfortunately, Scientology keeps the police and the  
23 courts at bay with its increasingly slick public image and its  
24 cloak of religiosity, and it keeps former Scientologists and  
25 others quiet by making it clear that anyone who speaks out  
26 publicly must be ready for their relentless harassment and  
27 intimidation.

28 88. Scientologists justify their harassment and

1 intimidation of critics with their devout belief that they are  
2 the only chance man has, that anyone who criticizes Scientology  
3 is part of the overall conspiracy to destroy Scientology, and  
4 that all enemies must be obliterated at all costs for the sake of  
5 the future of mankind.

6 89. The contempt with which Hubbard and his followers view  
7 non-Scientologists was made clear in a 1967 policy by Hubbard  
8 entitled "Critics of Scientology" in which he declared:

9 "We are slowly and carefully teaching  
10 the unholy a lesson. It is as follows: We  
11 are not a law enforcement agent. BUT we will  
12 become interested in the crimes of people who  
13 seek to stop us. If you oppose Scientology  
14 we promptly look up - and will find and  
15 expose - your crimes.. If you leave us alone  
16 we will leave you alone."

17 90. One of the primary methods of intimidation the  
18 Scientologists employ is the threat of public exposure of  
19 information divulged during security checks, publicly called  
20 "confessional" for the benefit of the courts and the IRS. This  
21 procedure is used extensively as a control method on staff  
22 members and is an extremely effective way of silencing criticism.

23 91. Anyone who leaves Scientology is extremely reluctant to  
24 speak out against the organization, being acutely aware that all  
25 of their security checks will be thoroughly culled for  
26 information that can be used against them, whether they are  
27 violations of the law or simply aspects of their personal life  
28 that will be embarrassing.

1           92. Scientologists routinely compile such information and  
2 either turn it over to the authorities for prosecution or, if (as  
3 usually occurs) there is nothing in which the authorities would  
4 be interested, they create a pamphlet or pack of materials and  
5 pass this information out to the target's neighbors, friends,  
6 family members, and business associates. The purpose, as Hubbard  
7 has stated repeatedly, is to destroy the person. Ideally, the  
8 person will be sent to jail; short of that, his or her reputation  
9 can be ruined and the person left penniless through loss of  
10 business.

11           93. It was in 1960 that Hubbard first began to  
12 institutionalize the destruction of his critics, a practice he  
13 would later refer to as the Fair Game doctrine. In a policy  
14 called "Department of Government Affairs" he established the  
15 forerunner of the Guardian's Office, later to be renamed the  
16 Office of Special Affairs:

17                        "In the face of danger from Govts or  
18 courts there are only two errors one can  
19 make: (a) do nothing and (b) defend. . . . If  
20 attacked on some vulnerable point by anyone  
21 or anything or any organization, always find  
22 or manufacture enough threat against them to  
23 cause them to sue for peace. Peace is bought  
24 with an exchange of advantage, so make the  
25 advantage and then settle. Don't ever  
26 defend. Always attack. Don't ever do  
27 nothing. Unexpected attacks in the rear of  
28 the enemy's front ranks work best. . . ."

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

11           94. It has been my personal experience that the current  
12           Scientology leaders will stop at nothing to protect Scientology  
13           from anyone they perceive as a threat. In this they are no  
14           different than the earlier Scientology leaders who went to jail,  
15           except that they have learned from the mistakes of their  
16           predecessors. The real crime of the Guardian Office leadership  
17           was that they got caught. The current Scientology leadership  
18           does not intend to let that happen again. They have developed  
19           more sophisticated methods of dealing with outsiders, (including  
20           the courts and the IRS) to mask their true motives and  
21           activities. But they are utterly unscrupulous in their  
22           determination to obliterate all obstacles that stand in the way  
23           of a "cleared planet."

24           95. I am still recovering from my experience in  
25           Scientology. I am still learning about how groups like  
26           Scientology use coercive methods to control people like myself,  
27           my husband, and many other individuals who are still under its  
28           spell. I believe that all Scientologists, even the current



1 leadership, are the victims of Hubbard's version of mind control,  
2 just as I was. These people, including the Scientology attorneys  
3 and paralegals who deal with the courts, have no idea how much  
4 they are under the coercive influence of Scientology and its  
5 leaders. They are utterly fanatical about their dedication, and  
6 determined to protect Scientology from "enemies" like my husband  
7 and me.

8

9 96. There have been a number of people before me who have  
10 publicly told the truth about Scientology and every one of them  
11 has been threatened, frightened, coerced or bought off into  
12 silence. I have to assume that packs of materials are already  
13 being assembled to discredit my husband and me; I am sure plans  
14 have already been drawn up which include every possible avenue of  
15 harassment and intimidation they can think of to silence us.

16 97. If the truth is ever going to come out about  
17 Scientology, I believe the court is going to have to recognize  
18 the danger inherent in becoming an expert witness on Scientology  
19 and offer every possible protection to such experts from the  
20 fanatical vindictiveness of this organization. I respectfully  
21 request that the court offer this protection to me in this case.

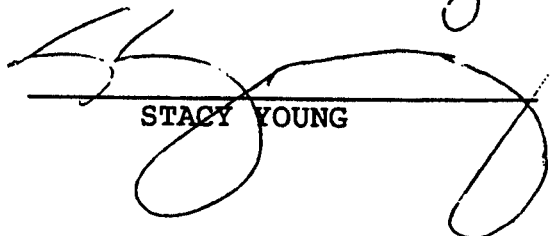
22 I declare, under penalty of perjury, that the foregoing is  
23 true and correct.

24 Executed this 23rd day of November, 1993 at Orange  
25 California.

26

27

28

  
STACY YOUNG