DECLARATION OF STACY BROOKS YOUNG

- I, Stacy Brooks Young, declare as follows:
- 1. I am over 18 years of age and a resident of Seattle, Washington.
- 2. I was a Scientologist for nearly 15 years, from January 1975 until I escaped with my husband, Robert Vaughn Young, in July 1989. From October 1975 until I left I was a member of the elite inner circle of Scientology, an unincorporated organization known as the Sea Organization ("Sea Org") which rules the Scientology empire. Unbeknownst to the outside world, even to lower level Scientologists, the head of the Sea Org and of Scientology, David Miscavige, subjects Sea Org members to extremely abusive and degrading treatment, sometimes carried out directly by him but often carried out by his key aides.
- 3. Such abuses include sleep deprivation, an enforced diet of nothing but rice and beans for weeks or even months at a time, incarceration in Scientology prison camps known as the Rehabilitation Project Force ("RPF") for months and sometimes years, sexual harassment and discrimination, requiring women to undergo abortions with the threat of losing their jobs if they refuse, enforced separation of parents and children, enforced separation of husbands and wives, and denial of proper medical care for people driven into psychotic episodes as a result of such abuse as described above.
- 4. A year and a half ago, in July 1993, my husband and I were asked by several attorneys to document the abuses we experienced and witnessed while in the inner circle of Scientology. These attorneys were defending people who were being sued by Scientology. Until that time we had kept totally quiet about our experiences because we were aware of how Scientology intimidates and harasses anyone who speaks out publicly about the abuses in this organization. We knew that if we began

to talk about what we knew our lives would no longer be our own, that Scientology would apply their "Fair Game" doctrine against us. The Fair Game doctrine directs Scientologists to lie, cheat and destroy anyone perceived as an "enemy." They claim that Fair Game was canceled long ago, but they are lying. Because we had seen it done to others, we knew that they would send private investigators to talk to our family, friends and neighbors, that they would dredge up everything they could about our private lives, in short, that we would be subjected to a campaign of character assassination just as any other fascist political movement like Scientology would conduct against its critics. However, we made the decision that it was too important to make the truth known, no matter what the cost to our own privacy.

- 5. The Scientologists have lived up to our worst expectations and beyond. They have stolen our trash, kept us under constant surveillance, sent out libelous information, slandered us to friends and family, and done everything possible to make us "shudder into silence," as Scientology creator L. Ron Hubbard directed them to do with critics. Our home has also been burglarized twice, and while we cannot prove that Scientology was responsible, we pointed out to police investigators that only our in-home office computers and disks were stolen, while other valuables in the house were left untouched.
- 6. In July 1994, just this past summer, two high level Scientologists approached my husband and me and offered to pay us money if we would perjure ourselves by stating under oath that the information we have provided in sworn declarations is false, which it is not, and agree never to speak or write another critical word about Scientology again. These two Scientologists warned us that if we refused to agree to their terms they would increase the intimidation and harassment of us, break us financially, and ruin our reputations. We still refused to give in to their threats.
- 7. True to their promise, they have stepped up their campaign against us in the last several months. It is continuing as recently as Monday, December 12, when a

private investigator called my mother and, under the guise that he was doing an investigation of my husband, attempted to turn my mother against me with lurid tales about my sex life. His attempt backfired, however, when my mother made it clear to him that she does not care about my sex life and that his attempt at character assassination made her sick. She demanded to know his name and phone number, and when he refused to give it to her she hung up on him. What they don't realize is that people outside of Scientology don't adhere to their Draconian morality, which especially in the Sea Org is so intrusive that people are sent to the prison camp for their sexual practices (the only exception being Miscavige's hand-picked aides, for whom these same laws do not apply). This same private investigator has already called one of my sisters and my other sisters are now expecting calls from him as well. Our family and friends are aware that this campaign is being waged against us and that it is being done because Scientology has not been able to silence us any other way.

- 8. I have been shown an extract of a motion made by Church of Scientology International in the case of Church of Scientology International v. Fishman and Geertz, No. 91-6426-HLH (Tx) (C.D.Cal.) in which CSI falsely alleges that my husband and I committed perjury in certain declarations we have submitted for this case. The extract is entitled Two Other Defense Witnesses Signed False Declarations. The phrase "two other defense witnesses" refers to my husband and me. It is false.
- 9. The extract is based on a certain "Rinder Declaration," submitted October 27, 1994, which is a wildly distorted, false representation of a series of meetings which occurred over an eight-day period in July 1994.
- 10. In June 1994, two high-level Scientology operatives, Mike Rinder and Mike Sutter, began to call me and my husband begging us to meet with them to "settle our differences." These two people called one or the other of us nearly every day for approximately a month, insisting that we meet with them and assuring us that they would make it very worth our while to do so, clearly implying that they wanted to pay

us money to stop doing the legal consulting work that we have done for Mr. Graham Berry and other attorneys whose clients have been sued by Scientology.

- 11. My husband Vaughn had no interest in meeting with them at all and told them so in no uncertain terms. Rinder and Sutter continued to call him and even arrived uninvited at our house in Corona del Mar, California, (where Vaughn was finishing up some work in preparation for moving to Seattle,) to try to get him to agree to a meeting. When it became obvious that Vaughn would not agree, they began calling me at our house in Seattle.
- 12. Mike Sutter called me every day, telling me how important it was that we meet with him and Rinder. Both Mike Sutter and Mike Rinder were superior to me and had a tremendous amount of power over me when I was a member of the cult. Sutter in particular had been assigned to "handle" me after Vaughn and I had tried to leave the cult and had been persuaded to return. Because of this past relationship which I now understand was based on mind control, I was still afraid of Sutter even five years after leaving Scientology. I allowed him to engage me in conversation, and by intimidating me he succeeded in convincing me that Vaughn and I should hear them out. I then talked Vaughn into meeting with them.
- 13. My state of mind at the time was that I did not want to have anything to do with Scientology any more. Although I did not realize it at the time, I was still under the influence of the cult to the degree that they could still intimidate me, frighten me, and "trigger" strong emotional reactions in me. Scientology was particularly upset about the work my husband and I had done for attorney Graham Berry, advising him about the destructive practices of the upper echelons of Scientology and submitting a number of declarations relevant to CSI v. Geertz. As I explained earlier in this declaration, because of our work for Mr. Berry and other attorneys, Scientology considered us "enemies" and we became the targets of Scientology's Fair Game doctrine, meaning that we had been harassed and intimidated relentlessly

by Scientology operatives. Although they attacked my husband much more viciously than me, it upset me very deeply and frightened me. I did not want to have my private life exposed and I did not want to see my husband's private life being distorted and exposed and held up to ridicule the way Scientology had been doing.

- 14. Because of their relentless harassment and intimidation, I had made a decision not to do any more work to expose the truth about the Scientology cult and, indeed, had not done so for several months prior to the meetings with Rinder and Sutter. I was also strongly pressuring my husband to stop so that we could regain our privacy and peace of mind. I wanted Scientology to leave us alone.
- 15. It was in this frightened state of mind that I began to receive the daily phone calls from Mike Sutter. Sutter assured me that the harassment would stop and made it clear that Scientology would pay us a large amount of money if we would settle with them. Sutter also made it clear that if we did not agree to settle with Scientology, we would be subjected to even greater harassment than we had already experienced, although he said that he was "sorry" and that "it doesn't have to be that way," if we would only agree to talk to them. I felt extremely intimidated by his phone calls and strongly pressured Vaughn to agree to talk to them. Although Vaughn did not feel that they were being above-board about their intentions, he agreed to it because he knew that I was very afraid of them and he did not feel he should force me to continue in a situation that was extremely frightening to me.
- 16. Mike Rinder and Mike Sutter arrived in Seattle on Friday, July 8, 1994. Vaughn also flew to Seattle on that day. Vaughn and I met with them nearly every day for the next eight days. I was extremely gracious and cordial to both of these Scientologists throughout the meetings, inviting them to our home and doing everything possible to create an atmosphere of trust and honor. After reading Rinder's declaration I feel betrayed and outraged that he has now perverted and twisted things that my husband and I talked to them about during those meetings. I

do not fault these two individuals. I know that they are under the influence of Scientology mind control and that the vicious lies Rinder has sworn to in his declaration are part of the campaign of character assassination that he is under orders to conduct against my husband and me.

17. However, I wish to correct the many lies and perversions of the truth that he has told about us. I also want to make it clear that I went along with much of what Rinder and Sutter said to us because I knew it would do no good to argue with them about much of what they were saying. Someone under the influence of Scientology mind control cannot change his mind about certain attitudes and beliefs, and I was aware that because these two people were still under the control of Scientology it would do no good to try to argue with them. Therefore, Rinder seems to have come away from the meetings thinking that I agreed with what he said simply because I did not refute it. The fact is that I did not bother to refute many things he and Sutter said because I knew it would be a waste of time. Furthermore, my husband and I had agreed to go along with them so that we could find out whatever it was they had to say to us that was so important that they had begged us to meet with them for over a month. The reason the meetings went on for so many days was that we kept waiting for them to get to the point and weren't able to find out what it was until the eighth day. (When we did finally get them to get to the point, we walked out.)

18. First and most importantly, at the very outset of these meetings we made it clear that we would not perjure ourselves by recanting any statements made in our previous declarations, that what we had stated was true and we would not now lie by saying that what we had written was not true. Much to their dismay, we also made it clear immediately that we would not in any way denigrate Mr. Graham Berry. They tried to change our minds about Mr. Berry by suggesting that he had put us up to writing our declarations, but we were emphatic in stating that he never did any such thing and we would not say that he did. At the end of the series of meetings we

discovered that, indeed, one of their <u>main</u> purposes was to get us to discredit Mr. Berry, who has been extremely successful in litigating against Scientology. A key theme in the declarations they drafted for us to sign was that Mr. Berry had orchestrated every aspect of our "attack" against Scientology. We refused to go along with their character assassination of Mr. Berry.

- 19. Throughout the meetings they repeatedly suggested that we write declarations but were vague about what they wanted the declarations to say. When they would bring up the subject of these declarations we would repeat that we could not write anything that would in any way suggest that we had lied, since we had not. At one point Sutter asked me what I felt I would be able to say, and I replied that I would be able to say I had written declarations as an expert witness for the defense of Uwe Geertz and Steven Fishman and that I had written them in a way that would be helpful to their defense. It is utterly false that "when the Youngs -- especially Stacy Young -- spoke frankly about what occurred here, they revealed that their declarations, too, had been falsified." We repeatedly emphasized to both Rinder and Sutter that nothing whatsoever in our declarations was false.
- 20. Many of the statements in the Rinder declaration are entirely false, while others are treacherously misleading in the way statements we made are misinterpreted and deliberately twisted to make me or my husband appear to be dishonorable or unscrupulous.
- 21. It is completely and utterly untrue that "At the beginning of our discussion, both of the Youngs stated that they did not enjoy manipulating the facts to attack and embarrass their former religion, but that economic hardship had compelled them to embark upon that course." Neither my husband nor I have ever believed that Scientology is a religion and would never refer to it as such. Furthermore, neither of us feel that we have manipulated facts. On the contrary, we have told the truth about

many destructive practices that are part of the Scientology empire in the hopes that exposure of these conditions will lead to their being changed.

- 22. Rinder's opinion that "it was apparent that the reason they were talking to us was because they found it emotionally distressing to be involved in an occupation that required them to figure out how to manipulate and distort facts for use in litigation" is contrived and utterly false. Moreover, I never said that I "could not stand living a lie and wanted out." As I have explained in a previous paragraph, what I found emotionally distressing was the campaign of harassment, intimidation and character assassination Scientology has been waging against us ever since we began to speak out about the abuses inside the cult.
- 23. Rinder's statement that I said we "tried to live off various family members while Vaughn attempted to establish himself as a writer" is utterly untrue and a fabrication out of thin air, as is the comment that "the family eventually balked at that, and the Youngs were on their own." We never "tried to live off" any of our family members and have been "on our own" all along.
- 24. Vaughn and I did have financial difficulties when we first left Scientology, as do many long-term members of Scientology's inner circle (and any other totalitarian cult, for that matter) if they are fortunate enough to free themselves from the cult's psychological, emotional and physical subjugation. Vaughn had been a Scientology staff member for 20 years and I had been one for 15 years. We had no résumé that we felt would make any sense to the "outside" world, nor did we have any references. We were considered "enemies" by Scientology, so we knew that people still inside the cult would not say anything favorable about us. Since we had had virtually no professional contact with anyone outside the cult for many years, we had no references. It was literally as if we had just landed from outer space.
- 25. I am sorry that I told these two Scientologists about the hardships Vaughn and I experienced as we were struggling to come out of the cult experience. I should

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have realized that they would utilize these details of our personal life in their campaign to discredit us. Rinder has now taken this information and twisted it to support his false argument that we are exposing the truth about Scientology to make money. The Court should know that there are many, many other ways we could make a living that would be much more enjoyable and more lucrative. But we feel a moral obligation to do what we can to expose the civil and human rights violations and serious abuses which this cult is perpetrating on its subjugated mind control victims.

26. Rinder falsely states that "At one point in our conversation, Stacy broke into tears and said that she and her husband only began consulting with and selling declarations to Graham Berry because she and Vaughn were so desperate for money. Stacy said she had been willing to say under oath whatever Berry wanted her to say if it would result in getting paid, as she could not face continuing to live under the financial pressure she and Vaughn were suffering. There was one point during the meetings with Rinder and Sutter when I did, indeed, break into tears. It was certainly not, however, for the reason Rinder states. I began to cry at one point as Mike Sutter was attempting to address my concerns about staff conditions and certain specific abuses I suffered while I was in the cult. Something he said triggered some extremely painful memories for me, memories of being forcibly separated from my husband, having our mail intercepted, being kept under guard to keep me from escaping to find my husband, being deprived of sleep for days on end, being locked in a room and interrogated for days at a time, being screamed at and terrorized by Miscavige and his top aides.

27. For many former cult members, certain things someone might say or do can trigger painful memories from their cult experience and they may find themselves becoming very emotional at unexpected times. I found that simply being in the same room with two members of Scientology's inner circle, two people who used to have

enormous power over me, stirred deep-seated emotions that I had not felt since I escaped from the cult. Of course, I did not explain this to these two Scientologists because I knew they would not understand. But certainly I was not upset for the reason Rinder has stated. He is trying to paint my relationship with Graham Berry in a scurrilous light but his accusations are utterly groundless and false. Mr. Berry never told me what to say in my declarations and certainly never drafted a declaration for me to sign the way Rinder and Sutter did for my husband and me. In fact it is the Scientologists who will say whatever will further their own agenda, regardless of whether it is true or not, just as Rinder has done in his declaration. They assume that people outside of Scientology have the same contempt for the legal system as they do, and that others are guilty of the same illegalities, such as perjury, which they commit themselves as a matter of course.

28. Rinder states that "both Mike Sutter and I brought up how we could not understand how they could tell so many lies in the declarations they had filed, especially those in the Fishman case. Neither denied that this was what they had done...." and repeats his character assassination of us as liars in the next paragraph where he states, "We challenged them to explain how they could justify lying as a way of life...." As I have stated earlier in my declaration, in fact my husband and I both repeatedly told them that we had not lied in our declarations, although throughout the meetings Rinder and Sutter did continue to characterize our sworn testimony as "lying." The truth is that if either of these people ever admitted to themselves that our testimony is true it would break the spell that Scientology has over them. But Scientology has a self-policing mechanism built into its mind control techniques which makes it almost impossible for someone under its influence to break through. Rinder and Sutter both know that our testimony is true. They are both acutely aware of the abuses we have described. But they are loyal Party Members and are sworn to protect the Party at all costs.

29. Clearly the main intent of Rinder's declaration is to discredit the declarations my husband and I have filed in CSI v. Fishman and Geertz. He seems most concerned with a declaration submitted by me on January 3, 1994, in which I detail how Scientology's fraudulent negligence in selling Steven Fishman nearly \$200,000 of Scientology materials and devices could have driven him into a psychotic episode. Rinder goes on for several pages, carefully reconstructing our conversations to make it appear that I somehow admitted to him that what I wrote was untrue. The subject of my January 3 declaration is extremely sensitive for Scientology and this is why Rinder has spent so much time trying to discredit it. But what I wrote in the declaration is true, and I attached many Scientology documents to prove it.

30. In fact, many people have been driven into psychotic episodes by Hubbard's techniques, as Rinder well knows. Far from being "pure nonsense," what I wrote about is one of Scientology's darkest secrets. I have personal knowledge of many people who have been driven into psychotic episodes by Scientology's techniques. Hubbard wrote precise directions about how to "handle" these people, including the "Isolation Watch." Rinder is well aware of these occurrences but cannot admit to it because it would violate Scientology policy for him to tell the truth about this subject publicly. It would threaten his good standing as a Scientologist and might get him sent to the prison camp, known as the Rehabilitation Project Force, where he would be separated from his wife and children, kept under guard and forced to do hard labor for 12 or more hours a day. Scientologists will do just about anything to avoid being sent to the RPF.

31. Rinder falsely states that I admitted to creating a false impression in the January 3 declaration about Scientology creator L. Ron Hubbard's use of mind control techniques. In fact, it is my firm conviction that Hubbard developed extremely sophisticated mind control techniques, that he did so quite deliberately, and that Scientology practices can be very psychologically damaging because of this. I

did not pull quotes out of context for the declaration as Rinder asserts. I would be happy to provide more quotes from Hubbard in which he goes into even more detail about how Scientology can be used destructively.

- 32. Rinder also distorted a conversation I had with him concerning Scientology's "upper level" materials. I do know that Hubbard wanted these materials kept secret, but I do not agree that they should be. People have the right to know that Hubbard's science fiction story about the cosmos is what they can expect after they have been sold many thousands of dollars of Scientology services. I do not consider a science fiction story to be a religious scripture, nor do I believe (as Scientologists claim) that there is any danger that anyone will get sick by reading these materials "before they are ready." This story has been published in many, many publications over a period of many years, and I have yet to hear of one person who has gotten sick from reading it. I think the only reason the Scientologists are so worried about keeping these materials secret is that they are afraid of losing money if people learn the truth. Certainly it has absolutely nothing to do with religion.
- 33. Rinder attempts to use me to further his own agenda in discrediting other former Scientologists. He falsely states that I think Gerry Armstrong and Larry Wollersheim are both psychotic. To set the record straight, I do not think either of these individuals is psychotic. Indeed, I think both are doing very well at recovering from their lengthy experience with Scientology mind control. However, I do know that Rinder and Sutter both think Gerry Armstrong and Larry Wollersheim are psychotic. I also know that they think my husband and I are psychotic, along with many other people who have come to their senses and left Scientology. This is because Hubbard said so. He repeatedly stated that anyone who leaves Scientology is psychotic. When I was still in Scientology and working for the Office of Special Affairs, it was accepted as a basic truth that anyone who left Scientology was crazy, especially anyone who left and then sued Scientology, which both Armstrong and Wollersheim

have done. The truth is that I consider Gerry Armstrong and Lawrence Wollersheim to be good friends and very courageous individuals.

- 34. Rinder also attempts to use me to discredit the testimony of another former Scientologist, Andre Tabayoyon. Rinder's version of my relationship with Andre and his wife Mary is wildly distorted and is clearly an effort on his part to create bad feelings between us. This is a technique called "Third Party" in Scientology, in which someone deliberately tells lies about a person to turn friends against friends. I did discuss an incident involving Andre, but I did so in the context of voicing concern about a friend. I now regret ever having said a word and realize I should have known he would use it to try to destroy my friendship with Andre and his wife, Mary. The conversation was carried on at Rinder's urging, of course, and I was naive not to see what he was doing. In fact, I value my friendship with Andre and Mary and think they are both extremely courageous to have testified about the outrageous abuses they were both subjected to while in Scientology. I hope they are progressing well in their recovery from Scientology.
- 35. My husband and I never agreed to "write declarations to set the record straight on points described above along with others." In fact we never did write any declarations or even portions of declarations but rather waited until Rinder and Sutter presented us with their own declarations, drafted by Scientology, for us to sign. When we read them we discovered that they had drafted declarations which did exactly what we had told them repeatedly we would not do. The declarations they wanted us to sign were utterly perjurious, stating that we had lied about virtually everything we have ever stated in declarations submitted in CSI v. Fishman and other cases. Additionally they wanted us to sign a gag order which would have destroyed our freedom of speech as well as our freedom of association by forbidding us ever to speak about our experiences in Scientology or even to meet with anyone else who was speaking about their experiences in Scientology.

- 36. The motion which is based on Rinder's declaration makes the wildly ridiculous claim that we were in "serious emotional turmoil over what [we] had done" and that we "agreed to execute new declarations undoing the false impressions they had created for Mr. Berry." In fact, as I have already stated, we never did execute any declarations for them at all, and the declarations they drafted for us to sign were completely outrageous.
- 37. The truth is that when they showed us the declarations they wanted us to sign I told them they were completely wrong to think we regretted any aspect of the work we had done for Mr. Berry. Indeed, I told them in no uncertain terms that I am very proud of the work I have done for Mr. Berry, because I feel it is extremely important for the truth to come out about Scientology.
- 38. Finally, the motion claims that we "demanded" to be paid an outrageous sum of money but that "the Church was and is unwilling to pay the Youngs to tell the truth." In fact, they offered to pay us nearly \$200,000 to sign their false and perjurious declarations, but we refused. We told them that we would never sign their declarations no matter how much money they gave us, because we would never perjure ourselves nor would we become pawns in Scientology's vendetta against Graham Berry.
- 39. Vaughn and I walked out of the meetings at that point, although they begged us to stay. They continued to call us repeatedly over the next several days, imploring us to meet with them again, assuring us that they would give us a "substantial financial settlement," but I finally made it clear to them that there was no point in continuing the meetings. Vaughn and I have made our decision to continue to expose the truth about Scientology no matter the cost, and that is what we intend to do. Rinder's blatantly false declaration is simply another part of their campaign to destroy our reputations and our credibility, which is what they warned us they would do if we did not give in to their demands.

40. During the course of our meetings Rinder commented that he couldn't think of anything he wouldn't do to silence an enemy of Scientology, that as far as he was concerned, the end would justify the means. Sutter and Rinder both made veiled threats during the course of the meetings, making it clear that if we did not settle with them Scientology would ruin our reputations, break us financially, and generally make our lives miserable. True to their threats, Scientology is now doing everything possible, including submitting perjured testimony to this court, to discredit me and my husband. But all of the testimony I have submitted to this court has been true, and it is extremely important that the information which has been submitted remain on the public record.

I swear under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed in Seattle, Washington, this 14th day of December, 1994.

Stacy Brooks Young