

DECLARATION OF STACY YOUNG

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2  
3 I, STACY YOUNG, declare as follows:

4 1. I was a member of the Church of Scientology for 14  
5 years, from January, 1975 until July, 1989. From October, 1975  
6 until July, 1989, I was a member of the Sea Organization, the  
7 most dedicated group of Scientologists in the entire  
8 organization. During my tenure in Scientology, I acquired  
9 extensive knowledge of the counseling methods as well as  
10 administrative and management practices and procedures of the  
11 organization.

12 2. The matters set forth herein are of my own personal  
13 knowledge and I could and would competently testify thereto.

14 3. I have reviewed Exhibits 1, 2, 6, 18-25, 29, 30, 32-35,  
15 41, 42, 44-80 and 82-87 of this motion and relied on them in  
16 forming the opinions set forth in this declaration.

17 4. My first experience with Scientology was at the Mission  
18 of Atlanta, Georgia, where I attended a series of introductory  
19 lectures in January, 1975. I received my first Scientology  
20 auditing in Atlanta, called "Life Repair", and I also took  
21 several courses.

22 5. I joined the Sea Organization ("Sea Org") at the  
23 Advanced Organization in Los Angeles ("AOLA") in October, 1975,  
24 signing a billion-year contract to confirm my dedication to  
25 Scientology and "clearing the planet" (see explanation below).

26 6. All staff members involved in the delivery of the  
27 confidential upper levels of Scientology processing ("OT  
28 Levels"), and all staff members involved in Scientology

1 management are members of the Sea Org, living communally and  
2 under the authority of the Sea Org command lines 24 hours a day.  
3 The Sea Org has complete authority over all Scientology and  
4 Scientology-related organizations, including all nonprofit and  
5 for-profit corporations. It cuts across all corporate boundaries  
6 and can take over any Scientology organization without notice.  
7 Any Scientologist who refuses to submit to Sea Org authority is  
8 declared a "suppressive person" and expelled from Scientology.

9       7. For a Scientologist, it is crucial to move up "The  
10 Bridge to Total Freedom", and get everyone else on Earth up "The  
11 Bridge" as well. The Bridge is composed of a series of specific  
12 processes developed by L. Ron Hubbard in which a counselor,  
13 called an "auditor", asks certain questions of a person, called a  
14 "preclear." The two people are normally alone in a room during  
15 this procedure, which is known as "auditing." The auditor's  
16 questions are designed to get the preclear to look at various  
17 incidents that have happened in the person's life. By doing this  
18 in a certain way, the person frees up mental energy that has been  
19 locked away by these incidents.

20       8. The idea is that the person frees up more and more  
21 mental energy by moving up The Bridge, regaining sanity and  
22 acquiring more control over life. The first major milestone on  
23 The Bridge is known as "going Clear." At this point, the person  
24 no longer has his or her own "reactive mind", (also called the  
25 "bank" or "case") which is the part of the mind that stores all  
26 the negative energy that keeps a person from realizing his or her  
27 full potential. After one achieves the state of Clear, one moves  
28 on to the confidential levels known as "Operating Thetan"

1 ("thetan" being Hubbard's term for the life force which is the  
2 person himself). These states are numbered, such as OT 1, OT2,  
3 OT3, etc. Currently, the highest level that can be achieved is  
4 OT 8.

5 9. Scientology's goal is to "clear the planet", by which  
6 is meant getting everyone on Earth up the Bridge to Clear and  
7 beyond.

8 10. I was a staff member at AOLA from October, 1975 through  
9 December, 1978. Once I had completed my training and had  
10 attained the "case level" of OT 3, I became an "AO Auditor" and  
11 audited hundreds of hours on public preclears as well as staff  
12 members. I audited many of the "tough cases" at AOLA because of  
13 my ability to "get the pc through" whatever was stopping him or  
14 her from continuing "up the Bridge." I also did many security  
15 checks on staff members. A security check is a technique whereby  
16 a person is supposed to confess to his or her crimes,  
17 particularly crimes against Scientology.

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

27 12. As a result of my experiences at AOLA I acquired a high  
28 level of expertise as a "tech terminal," meaning one who is

1 knowledgeable about the technical application of Scientology  
2 counseling and training methods.

3 13. At the end of 1977 I transferred to the United States  
4 Guardian's Office ("USGO") in Los Angeles. I was a staff member  
5 in the USGO from January 1978 through January 1982. The  
6 Guardian's Office was the part of Scientology that handled Public  
7 Relations, Intelligence and Legal matters for Scientology.

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

24 15. In early 1982, I was posted in Special Project as PR  
25 Assistant under my husband, Robert Vaughn Young. In this  
26 position I became familiar with the L. Ron Hubbard archives  
27 materials, which was the complete collection of all of Hubbard's  
28 personal papers, including diaries, letters and notes that he had

1 kept from a very early age.

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

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

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

26 19. Because of my experience in ASI I am familiar with the  
27 day-to-day activities of the highest levels of management of  
28 Scientology. I have firsthand knowledge of the establishment of

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

9       20. I am also familiar with the absolute authority which  
10 the highest levels of Scientology management exercise over every  
11 aspect of Scientology and Scientology-related organizations,  
12 whether "church" or "secular."

13       21. In September of 1982, I was assigned to the  
14 Rehabilitation Project Force ("RPF"), the Scientology version of  
15 a prison camp. I was on the RPF in Los Angeles for eight months.  
16 As a result of this experience, I am familiar with the absolute  
17 control which the highest levels of Scientology management have  
18 over the behavior and thought processes of every Sea Org member.  
19 There is only one way for a good Sea Org member to behave and  
20 think, and any deviation from this is punished immediately and  
21 severely. In turn, it is the responsibility of all members of  
22 Sea Org management to bring about the same pattern of behavior  
23 and thought in all Scientologists under their authority,  
24 regardless of whether those under their authority are part of the  
25 "church" or the various "secular" arms of Scientology. This  
26 distinction means nothing within Scientology; it was created  
27 purely to facilitate dissemination of Scientology and to fend off  
28 Scientology's "enemies" such as the IRS.

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

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

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

1           25. In 1987, North Star Publishing was reintegrated as part  
2 of OSA again. My primary functions were again writing and  
3 editing. I wrote for FREEDOM Magazine, Scientology Today, and  
4 the Crusader. In Scientology, every aspect of PR is directed  
5 toward a particular "public." FREEDOM Magazine was directed  
6 toward government officials, legislators, heads of businesses,  
7 and other key "publics" who needed to be brought into agreement  
8 with Scientology's views of the key attackers of Scientology,  
9 such as the IRS, psychiatrists, etc. Scientology Today was  
10 directed toward all Scientologists and was intended to promote  
11 OSA as a powerful and successful arm of Scientology that was  
12 winning the war against the enemies of Scientology. The Crusader  
13 was a publication directed toward religious leaders and ministers  
14 of other religions and was intended to create allies for  
15 Scientology in the religious community.

16           26. As a writer and editor in the PR Division of OSA, my  
17 primary responsibility was to "communicate the correct message to  
18 the correct public." When I wrote for Scientology Today, a  
19 publication intended for Scientologists, the viewpoint to be  
20 communicated was that Scientology was everywhere, that  
21 Scientology always wins, and that no matter who we are or what we  
22 are doing, we are all Scientologists working for the same  
23 purpose: to clear the planet.

24           27. When I wrote for FREEDOM Magazine, which is for non-  
25 Scientologists, specifically media, government officials,  
26 legislators and major business leaders, I was not to emphasize  
27 Scientology at all, but rather, I was to present a strictly  
28 factual, professional view of whatever subject I was writing on.

1 These subjects were "exposes" of the crimes of enemies of  
2 Scientology, particularly the IRS, psychiatry and any other  
3 government agency or individual that was attacking Scientology.

4 28. The editors of FREEDOM Magazine, including two others  
5 and myself, created a front group called "The Coalition of IRS  
6 Whistleblowers" so that when we wrote stories attacking the IRS  
7 we could quote someone else rather than having to attribute it to  
8 Scientology. To do this we ran ads in several papers asking for  
9 "current and former employees of the IRS to come forward and tell  
10 their stories of abuse within the agency." In this way, we  
11 acquired several disgruntled former IRS agents, one disgruntled  
12 former congressman, and several "abuse cases" (citizens who felt  
13 they had been treated unjustly by the IRS) who were all willing  
14 to speak out publicly against the IRS. We staged several press  
15 conferences at which former IRS agent Paul DesFosses, former  
16 Congressman George Hansen, and others made public statements  
17 about how abusive the IRS was. We then reported on these events  
18 in FREEDOM, thereby putting us at arm's length from the  
19 statements being made. The group was funded, organized and  
20 managed by Scientology, but this was never mentioned.

21 29. The Crusader was a front publication created during the  
22 "Religious Freedom Crusade," a PR event staged for the  
23 Wollersheim case, as a means of "allying" ministers and other  
24 religious leaders and to create goodwill for Scientology. There  
25 was no mention of Scientology in the copyright or masthead of the  
26 publication, and no one outside of OSA was to know that the  
27 Crusader was published by Scientology. In each issue there might  
28 be one or two stories on a Scientology-related issue, but most of

1 the stories were about other religions and other topics  
2 concerning religious freedom. No one in OSA or on the OSA  
3 command lines cared about these other issues. It was simply a  
4 way to mask the true purpose of the publication and to get  
5 religious leaders to view Scientology as a religion that they  
6 should defend along with their own faith.

7 30. When Hubbard died in 1986 I was ordered to write the  
8 copy for the "In Memoriam" full-page eulogy that ran in several  
9 major papers across the country. I was then assigned the task of  
10 creating the "LRH booklet," a longer eulogy of Hubbard in which  
11 his achievements in various areas were catalogued. These areas  
12 included Explorer, Philosopher, Drug Rehabilitation, Educator,  
13 Administrator, Artist, Author of Fiction, and Humanitarian.

14 31. Two different versions of the booklet were created.  
15 For Scientologists and other religious "publics," the subhead on  
16 the cover of the booklet read "Best-selling Author, Founder of  
17 Scientology, Friend to Millions." For businesses and educators,  
18 the subhead read "Best-selling Author, Humanitarian, Friend to  
19 Millions." Certain passages in the text of the booklet were also  
20 revised for the "secular" version of the booklet, because WISE  
21 (World Institute of Scientology Enterprises) and ABLE  
22 (Association for Better Living and Education) would not be able  
23 to use the booklet with their potential markets if it showed  
24 Hubbard as the founder of Scientology. He could be the author of  
25 the writings that had later been adopted by the Church of  
26 Scientology, but if the WISE and ABLE publics found out that they  
27 were being promoted by a leg of the Church of Scientology, they  
28 would be turned off. So two different versions were published

1 and carefully separated so that the secular version went to WISE  
2 and ABLE and the "religious" version went to Scientologists and  
3 other religions.

4 32. As a result of my experience as a writer for these  
5 different Scientology publications, I am familiar with  
6 Scientology's practice of changing its story for whatever public  
7 it is trying to reach. Often I rewrote the same basic story for  
8 each publication, completely changing the wording and overall  
9 thrust of the story to appeal to the different publics that were  
10 going to read it.

11 33. As a writer in OSA I was also responsible for writing  
12 rebuttals of negative stores about Scientology that were  
13 published in various newspapers across the country. I was also  
14 assigned to write rebuttals of books that were published that  
15 were negative about Hubbard and Scientology. As a result of this  
16 work I became very familiar with the policies and practices of  
17 Scientology with regard to individuals and groups that criticize  
18 the organization. I have personal knowledge that the practices  
19 which were formerly called "fair game" continue to be employed  
20 although the term "fair game" is no longer used. These tactics  
21 are laid out in many of the key policies that are studied and  
22 applied by staff of OSA.

23 34. In July, 1989 my husband and I left Scientology. We  
24 lived in San Diego from 1989 until August, 1991, at which time we  
25 moved to Newport Beach. We are currently living in Corona del  
26 Mar, California.

27 35. As a result of my experiences in Scientology, I am  
28 qualified to discuss the policies, procedures and practices of

1 this organization, including its relationship to Sterling  
2 Management.

3 36. Within Scientology there is no question that Sterling  
4 is a dissemination arm of Scientology, and that its main purpose  
5 is to feed new people into the "church." Certainly no one in  
6 Scientology is actually concerned about helping dentists or  
7 veterinarians to increase their business. There is no policy by  
8 L. Ron Hubbard that encourages Scientologists to help dentists  
9 and veterinarians increase their business, so there is no  
10 interest in it. The only reason that Scientologists engage in  
11 any kind of activity is that it is covered in a policy written by  
12 L. Ron Hubbard.

13 37. Sterling Management is allowed to exist for two  
14 reasons: (1) it acts as a feeder of new preclears into  
15 Scientology and therefore, (2) it is an excellent source of  
16 income for Scientology. Income is always of great interest to  
17 Scientology management.

18 38. I have read a number of declarations by dentists and  
19 others who have been taken in by Sterling (including declarations  
20 by Alexander Turbyne, John Finucane, Glaydon R. Kern, D.D.S.,  
21 Michael E. Rolfing, D.D.S., Julia A. Holmes, D.D.S., Connie  
22 Hyler-Both, Frances S. Miller and Peter S. Miller.) These people  
23 are all bewildered by the fact that no one in Sterling is trained  
24 as a consultant in their field of expertise. What these people  
25 do not understand is that for a Scientologist, the only valid  
26 field of expertise is Scientology. Everything else is only  
27 valuable to the degree that it will forward Scientology and speed  
28 the spread of Scientology throughout the world. For a Sterling

1 "consultant", the best possible result for one of their "clients"  
2 would be that he or she (1) gives all their money to Scientology,  
3 and (2) closes the business altogether and joins staff at  
4 Sterling (or some other branch of Scientology). If the person is  
5 actually in a powerful position of some sort in the business  
6 world, the idea would be to turn them into a Scientologist and  
7 get them disseminating Scientology to everyone they do business  
8 with. In that case, it would be better not to recruit them onto  
9 staff since they would be able to disseminate more effectively by  
10 remaining in place in society.

11 39. This is simply the way it is, and it is an attitude  
12 which is voiced with pride within Scientology. It is only for  
13 those who are not yet in Scientology that this charade of helping  
14 them expand their business is played out.

15 40. This charade is part of the public persona of  
16 Scientology, which is held up for all non-Scientologists to see.  
17 This image of Scientology is carefully orchestrated so that  
18 different parts of society are shown a "Scientology" that will be  
19 most appealing to them. The entire purpose of this elaborate  
20 public relations activity is to hook a person into becoming a  
21 Scientologist by getting him or her to accept one little piece of  
22 it that is acceptable, and then to draw them in further by  
23 gradually introducing them to more and more of the "technology"  
24 until before they know it, they are on "The Bridge to Total  
25 Freedom."

26 41. Hubbard discusses this quite openly in a number of  
27 policies. For example, in a policy called PR Series 2, the  
28 Missing Ingredient (HCO PL 13 Aug 70 II), Hubbard begins by

1 stating emphatically that one should "NEVER USE LIES IN PR." But  
2 then he qualifies his statement, as follows:

3 "Handling truth is a touchy business also. You  
4 don't have to tell everything you know - that would jam  
5 the comm[unication] lines too. Tell an *acceptable*  
6 *truth.*"

7 "Agreement with one's message is what PR is  
8 seeking to achieve. Thus, the message must compare to  
9 the personal experience of the audience."

10 "So PR becomes the technique of communicating an  
11 acceptable truth - and which will attain the desirable  
12 result."

13 "The use of R [reality] not only involves truth,  
14 it involves acceptable truth and that involves the  
15 fixed opinions of another or others and their  
16 experience. All this is contained in the subject of  
17 REALITY."

18 "What is the R of others?"

19 "This involves SURVEYS."

20 "Then you know what truth he or they will accept."

21 42. He says more on the same subject in PR Series  
22 3, Wrong Publics (HCO PL 13 Aug 70 III):

23 "There are hundreds of different types of  
24 publics."

25 "An interest in common or a professional or caste  
26 characteristic in common - some similarity amongst a  
27 special group - determines the type of public or  
28 audience."

1           "The PR needs this grouping as he can expect each  
2 different type of public to have different interests.  
3 Therefore, his promotion to them must be designed  
4 specially for each type of public. . . ."

5           "The PR is after a result, a call in, a reply, a  
6 response."

7           "The right message in the right form to the right  
8 public gets the result."

9           "A wrong message to the wrong public simply costs  
10 lots of money and gets no result."

11         43. It is all a matter of publics, and how to go about  
12 getting them into Scientology in the fastest, most economical  
13 way. This is clear in ads for Sterling Management in Scientology  
14 publications such as Prosperity and Source, because when they are  
15 communicating to their Scientology public, they drop the charade.  
16 Barbara Wilson's success story in Issue 74 of Source is a perfect  
17 example of how a Sterling staff member would characterize what  
18 they are actually doing. She would, of course, never communicate  
19 this way to a potential client. (See Exhibit "32")

20         44. The guise of the helpful, professional consulting  
21 business drops immediately if a client shows any sign of exposing  
22 Sterling's charade. One can catch a glimpse of the true face of  
23 Scientology in a letter dated October 8, 1987, signed by Joan  
24 Heller, Legal Officer. (See Exhibit "35") The routing on the  
25 letter is from Sterling Management Systems to WISE International,  
26 which is sterling's senior within the Sea Org. Apparently Joan  
27 was sending this letter to her senior for approval before sending  
28 it out.

1           45. The name of the doctor to whom this letter was to be  
2 sent has been deleted, but from the content it is clear that he  
3 had asked for his money back and had been speaking out publicly  
4 in some negative way about Sterling. Within Scientology,  
5 publicly criticizing Scientology is a suppressive act, and the  
6 person committing such an act is known as a suppressive person.  
7 This means the person is an enemy of Scientology, and there are  
8 many policies covering what to do to silence such a person. It  
9 used to be known as the "fair game" policy. As stated earlier,  
10 although it is no longer called fair game, the practice is still  
11 in force.

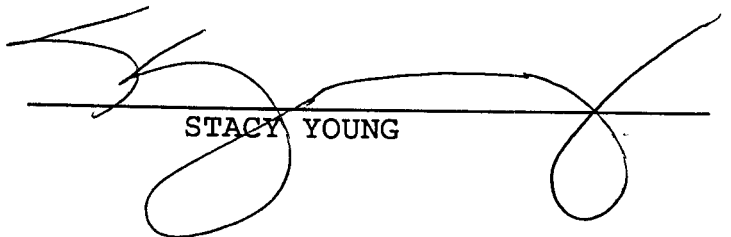
12           46. In this particular letter, the Legal Officer tells him  
13 that a review of his file "shows that you actually make more  
14 money than you report to the IRS and that you are skimming around  
15 \$25,000 off the top prior to reports. This information is only  
16 what we have found so far. If this matter went public, of  
17 course, we would have to pursue what's behind this attack and  
18 expose any other crimes found. It is our experience that those  
19 who attack us, after all the things we try to do for them, have  
20 something to hide. We are more than willing to review this  
21 publicly if you continue your slanderous and defamatory  
22 accusations." In the real world, this is a clear example of  
23 blackmail. Within Scientology, it is simply standard procedure  
24 for protecting Scientology from its enemies.

25           47. The particular lawsuit against the Cult Awareness  
26 Network for which this declaration has been prepared, is a  
27 classic example of the kind of tactics employed by Scientology to  
28 silence its critics. CAN has been a thorn in Scientology's side

1 for many years, and as far as Scientology is concerned, the two  
2 groups are involved in a fight to the death. Certainly  
3 Scientology's aim is to put CAN out of business permanently.  
4 This was its aim when I was personally involved in attacks  
5 against CAN, and I have no reason to believe this aim has  
6 changed. As stated earlier, Scientologists do exactly what they  
7 are instructed to do in L. Ron Hubbard policies and nothing else.  
8 Policy on the handling of critics of Scientology has not changed.  
9 Therefore, until CAN stops speaking out against Scientology, the  
10 group will continue to be attacked, harassed and sued by  
11 Scientology.

12 I declare under penalty of perjury that the foregoing is  
13 true and correct.

14 Executed this 9th day of September, 1993 at Corona del Mar,  
15 California.

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17 STACY YOUNG  
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