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6 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
7 COUNTY DEPARTMENT, LAW DIVISION

8 CYNTHIA KISSER,) No. 92 L 8593
9)
10 Plaintiff,)
11 vs.) **DECLARATION**
12 THE CHICAGO CRUSADER, et al.) **OF ROBERT VAUGHN YOUNG**
13 Defendants.)
14

15 ROBERT VAUGHN YOUNG, declares as follows:

16 1. I am above the age of eighteen years old, am not a party
17 to this action, and if called upon to testify in open court would
18 testify as follows:

19 2. I am a resident of the State of California, City of
20 Corona Del Mar.

21 3. I have reviewed a copy of the amended complaint in the
22 above action filed on October 19, 1994. I understand that
23 Scientology wants to take my deposition. I am providing this
24 declaration to show that there is no basis for Scientology to
25 depose me. I have reviewed a copy of the Amended Verified
26 Complaint At Law filed herein on October 19, 1994, and am familiar
27 with the allegations set forth therein. I have no information
28 pertaining to said allegations.

1 4. I have never met Cynthia Kisser. I have spoken to her
2 on the telephone, but never had any communication with her
3 regarding the allegations in this lawsuit, or anything concerning
4 her personal life.

5 5. I am not a member of the Cult Awareness Network.

6 6. I possess no information whether or not Ms. Kisser has
7 ever been a "topless dancer in the Blue Note Bar in Tucson,
8 Arizona" or any place else, as alleged in paragraph 5 of count I
9 and paragraph 6-A of count II of said amended complaint.

10 7. I possess no information whether or not Ms. Kisser
11 was ever "fired" because "she caused numerous problems with co-
12 workers and customers" as alleged in paragraph 5 of count I and
13 paragraph 6-A of count II of said amended complaint.

14 8. I possess no information whether or not Ms. Kisser
15 had ever "picked up the mantle of Nazi architect of the Holocaust
16 Reinhart Heydrich who in 1936 was ordered by Hitler to rid the
17 Third Reich of 'sects and cults'" as alleged in paragraph 6 of
18 Count I of said amended complaint.

19 9. I possess no information whether or not Ms. Kisser, or
20 individuals associated with the Cult Awareness Network kidnap
21 individuals as alleged in paragraph 6-B of Count II of said
22 amended complaint.

23 10. I possess no information whether or not Ms. Kisser, or
24 individuals associated with the Cult Awareness Network provide
25 individuals with drugs whose possession and distribution are
26 prohibited by law as alleged in paragraph 6-C of Count II of said
27 amended complaint.

28 11. I possess no information whether or not Ms. Kisser, or

1 individuals associated with the Cult Awareness Network are
2 associated with individuals who have been convicted of crimes
3 involving sexual perversions as alleged in paragraph 6-D of Count
4 II of said amended complaint.

5 12. I possess no information whether or not Ms. Kissler, or
6 individuals associated with the Cult Awareness Network are Nazi-
7 like, associated with Hitler and advocates of Holocaust type
8 solutions to the problems of "sects and cults" and are thereby
9 guilty of crime against humanity involving mass murder as alleged
10 in paragraph 6-E of Count II of said amended complaint.

11 13. I possess no information whether or not Ms. Kissler, "had
12 a previous career as a topless dancer at the Blue Note Lounge in
13 Tucson, Arizona. Now defends the pedophile crowd in Nebraska" as
14 alleged in paragraph 5 of Count IV of said amended complaint.

15 14. I possess no information whether or not Ms. Kissler, or
16 individuals associated with the Cult Awareness Network have been
17 associated with Dahmer, the Milwaukee man accused of cannibalism
18 and dismemberment of his murder victims as alleged in paragraph 7-
19 A of Count IV of said amended complaint.

20 15. I possess no information whether or not Ms. Kissler, or
21 individuals associated with the Cult Awareness Network "took to
22 the airwaves and newspapers to protect a pedophile ring in Omaha,
23 Nebraska as alleged in paragraph 7-B of Count IV of said amended
24 complaint.

25 16. I possess no information whether or not Ms. Kissler, or
26 individuals associated with the Cult Awareness Network have been
27 associated with psycho-killer Charles Manson and linked to the
28 infamous Son of Sam murders" as alleged in paragraph 7-C of Count

1 IV of said amended complaint.

2 17. I possess no information regarding the actions of
3 defendants in disseminating any and all of the foregoing
4 statements.

5 18. I possess no information regarding the manner in which
6 Ms. Kisser was damaged as alleged in the amended complaint.

7 19. I possess no information whether or not Ms. Kisser
8 ever sought a retraction of any of the above statements as alleged
9 in said amended complaint.

10 20. I am providing this declaration in order to satisfy
11 Scientology's need to know whether or not I have any evidence
12 related to the above case. I do not. I believe that
13 Scientology's desire to take my deposition is part of an on-going
14 tactic of retribution in furtherance of its Fair Game Policy
15 because I am a former Scientologist who has taken a public stance
16 criticizing Scientology's practices, the character of its founder
17 L. Ron Hubbard and its present commandant, David Miscavige.

18 21. I have been previously deposed by Scientology on three
19 different occasions. If Scientology can provide some reasonable
20 basis for taking my deposition in this case, I would consider
21 making myself available for the same. In the absence of such
22 evidence of good faith, however, I believe that Scientology is
23 simply attempting to harass me.

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Pursuant to the laws of the State of California and under penalty of perjury, I hereby declare that the foregoing is true and correct.

Executed on October 31, 1994 at Corona del Mar, California.


ROBERT VAUGHN YOUNG