

looked like Lawrence Wollersheim was going to win his suit against CSC and\015 the corporation had to be gutted of all its assets before the decision was\015 handed down. All that would be left of CSC would be a shell consisting of\015 a Treasury office and the FREEDOM office. When Wollersheim tried to\015 collect from CSC, he would discover that there were no assets at all in\015 CSC . \015

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48. We did move our office to the building on Catalina. The\015 Treasury office also moved. I was told by the Treasury Secretary, Rhea\015 Smith, that all of the assets of CSC had been taken out of the CSC\015 accounts. The motto of OSA US during the Wollersheim trial was "Not One\015 Thin Dime," meaning Scientology would never pay even a dime to Lawrence\015 Wollersheim. The OSA US\015

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The OSA US staff were briefed on the gutting of CSC at a staff meeting, and\015 all of\015 the staff cheered because now Wollersheim couldn't get his hands on any\015 money even if he won his suit.\015

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49. This gutting of CSC to hide assets\015 from a litigant and then cheering about it at a staff meeting is an\015 example of the contempt in which the Scientology Command holds the UPS.\015 justice system. The corporate structure of Scientology is created and\015 recreated depending upon the convenience of the moment, as illustrated in\015 the above example.\015

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50. The idea that the remarks attributed to Fishman\015 and Geertz in the Time Magazine article upon which CSI's claims are\015 purportedly based refer to CSI rather than to Scientology generally is\015 absurd. **Inside the Scientology empire no one takes the corporate structure\015 seriously. The corporate structure is a contrivance to enable Scientology\015 to interface to its advantage with the "wog" world.** This Court should not\015 be fooled by the corporate sleight of hand which was attempted in this\015 case. "Scientology, "Scientologist" and "the church" refer to the\015 overall, generic empire of Scientology, not to CSI, and no one even within\015 Scientology would think of CSI when reading those words, much less the\015 general public.\015

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It is CSI That is Harassing. Not the Defendants\015

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51. CSI asserted that this case must be dismissed to protect several\015 Scientology\015 celebrities who were noticed for brief depositions not to exceed two hours\015 each. CSI claims that these celebrities were served for the express\015 purpose of harassment and abuse. CSI asserted that it feared these\015 celebrities would be exposed to confidential upper level materials if CSI\015 allowed them to be deposed. CSI further asserted that "CSI has seen its\015 religious tenets and scriptures assailed; it has been compelled to\015 produce or offer for deposition the religion's most senior ecclesiastical\015 leaders so they can be reviled; and it has endured a transparent campaign\015 to harass CSI into default." CSI cited this as its excuse to move to\015 dismiss this entire case.\015

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52. Nothing could be further from the truth.\015 The CSI manag- ing agents and the other Scientologists who have been\015 deposed in this case have been interrogated only about the use and misuse\015 of L. Ron Hubbard's technology ("Tech") for secular purposes. The fact\015

that the same Tech is also used for so-called religious purposes does not\015
make inquiry about the Tech a reviling of the Scientology belief system or\015
its most senior members.\015
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53. Even I, who spent many years helping to\015
create this kind of utterly hypocritical rhetoric for the Church of\015
Scientology, am stunned at this latest fantasy concocted by CSI.\015
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54. Dr. Geertz's attorneys have never expressed in my presence any intention\0
whatsoever to bring up Scientology's confidential upper level materials\015
during the deposition of the Scientology celebrities. I have been advising\015
Graham Berry and Gordon Calhoun, Dr. Geertz's attorneys, as an expert\015
consultant on Scientology Tech matters. I would know from the type of\015
advice and guidance they have sought from me whether they intended to\015
inquire about the "religious" or "ecclesiastical" uses of the Tech as\015
opposed to the secular use of the Tech. Their inquiries have been limited\015
to secular uses of the Tech. Why should they ask these people about\015
Scientology's confidential upper level materials? There would be no point\015
in bringing up those materials. For the Scientologists to assert a concern\015
over this is simply another example of their **assuming that others will use\015
their own harassing tactics**. In fact, I advised Dr. Geertz's attorneys to\015
advise the Scientology celebrities about the lack of corporate boundaries\015
in Scientology. Miscavige, COB RTC, insists upon treating all the\015
celebrities with kid gloves and personally oversees their progress in\015
Scientology, sending RTC, Cmo Int or Gold specialists to take care of\015
their needs regardless of any supposed corporate structure.\015
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55. What is astonishing to me is the incredible arrogance of CSI in\015
accusing Dr.\015
Geertz and his counsel of exactly those actions in which CSI regularly\015
engages. It is not the defendants Dr. Geertz and Mr. Fishman who have\015
been conducting an all-out campaign of harassment, assault and\015
vilification; it is CSI that has been doing so. Indeed, the leadership of\015
CSI has no choice but to do so. CSI's leadership is bound to do so by\015
Scientology doctrine. CSI's leadership would be acting heretically or\015
unorthodoxly if it did otherwise. Founder L. Ron Hubbard, whose edicts on\015
these subjects are "sacred scripture" which must be implemented without\015
question or reservation, gave specific instructions to harass and destroy\015
anyone perceived as an enemy of Scientology. There are many, many policy\015
statements by Hubbard, which bind all Scientologists, that go into this.\015
What follows are only a few examples.\015

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CSI Is Bound by Its Own scripture to Harass Its Critics\015
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56. Hubbard wrote "The Scientologist: A Manual of\015
Dissemination of Material" (attached as Exhibit 3, see p. 157) in 1955. He\015
gave the following instructions for dealing with anyone who sought to\015
compete with orthodox Scientology:\015

"The purpose of the suit is to harass\015
and discourage rather than to win. The\015
law can be used very easily to\015
harass, and enough harassment on somebody\015
who is simply on the thin edge\015
anyway, well knowing that he is not\015
authorized, will generally be\015
sufficient to cause his professional\015
decease. If possible, of course,\015
ruin him utterly." \015

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57. Hubbard also urged Scientologists to employ private\015
detectives to investigate anyone who criticized Scientology. He added, in\015
language particularly apropos to this lawsuit: "... we should be very\015
alert to sue for slander at the slightest chance so as to discourage the\015
public press from mentioning Scientology." \015

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58. In 1959 Hubbard published\015
the "Manual of Justice" for Scientology (attached as Exhibit 4). This\015
document instructs Scientologists as follows:\015
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"People attack Scientology;\015

I never forget it, always even the score....\015

"When we need somebody\015

haunted we investigate....\015

When we investigate we do so noisily always.\015

And usually investigation damps out the trouble\015

even when we discover no really pertinent facts.\015

Remember that by investigation alone we can curb\015

pushes and crush wildcat people and unethical\015

'Dianetics and Scientology' organizations....\015

"Of twenty-one persons found attacking Dianetics and\015

eighteen of them under investigation Scientology\015

were found to be members of the Communist Party or criminals,\015

usually both. The smell of\015

police or private detectives caused them to fly,\015

to close down, to confess. Hire [private detectives] and damn the\015

cost when you need to." \015

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59. As author Jon Atack wrote in his well-researched book, A Piece of Blue\015
Sky: Dianetics, Scientology and L. Ron Hubbard Exposed: "A mood was being\015
created in which staff members would become 'deployable agents,' as\015
sociologist Roy Wallis called Hubbard's henchman in his excellent study of\015
Scientology. After all, Hubbard never gave any indication of the\015
possibility that a complaint against him or against Scientology could be\015
justifiable. The tactic of 'noisy investigation' originated in the Manual,\015
and came to mean harassment by defamation. Hubbard certainly did not mind\015
if the defamation was grossly exaggerated, or even a total fabrication. If\015
you throw enough mud, some will stick. The Manual of Justice suggests\015
outright blackmail." (The section of the book which contains this passage\015
is attached as Exhibit 5.) 60. ~~In 1960 Hubbard wrote another policy called~~\015
~~"The Department of Government Affairs" (attached as Exhibit 6), which~~\015
~~stated, in part:~~\015

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".... Only attacks resolve threats.\015

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". . . Only attacks resolve threats. "In the face of danger from Govts or\015
courts there are only two errors one can make: (a) do nothing and (b)\015
defend. The right things to do with any threat are to (1) Find out if we\015
want to play the offered game or not, (2) If not, derail the offered game\015
with a feint or attack upon the most vulnerable point which can be\015
disclosed in the enemy ranks, (3) Make enough threat or clamor to cause\015
the enemy to quail, (4) Don't try to get any money out of it, (5) Make\015
every attack by us also sell Scientology and (6) Win. . "The goal of the\015
~~department is to bring the government and hostile philosophies or~~\015
~~agencies into a state of complete compliance with the goals of~~\015
Scientology. This is done by high level ability to control, and in its\015
~~absence, by low level ability to control. Inadvertent such agencies.~~\015
Control such agencies. Scientology is the only game on Earth where\015

everybody wins. There is no overt in bringing good order." \015
\015

61. In other words, only activities which promote the expansion of \015
Scientology or which \015
attack and injure its critics are good or ethical by Scientology \015
standards. Any attack or injury to the enemies of Scientology is \015
justified. The end, universal acceptance of the Scientology belief system, \015
justifies the means, attacking or injuring enemies of Scientology, \015
particularly psychiatrists, psychologists and those who have criticized \015
Scientology. \015
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62. In another policy statement called "Attacks on \015
Scientology (Additional Policy Letter)" (attached as Exhibit 7) Hubbard \015
instructed Scientologists to: "(1) Spot who is attacking us." "(2) Start \015
~~investigating them promptly for FELONIES or worse using our own~~ \015
~~professionals, not outside agencies.~~ "(3) Double curve our reply by \015
~~saying we welcome an investigation of them.~~" "(4) Start feeding lurid \015
blood, sex, crime actual evidence [sic] on the attackers to the press." \015
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63. ~~Each of the documents authored by Hubbard are still part of the~~ \015
~~Scientology doctrine today. In fact, these documents, along with many~~ \015
~~of~~ ~~comprise the heart and~~ soul of the activities of the Office of \015
~~Special Affairs (formerly the Guardian's Office).~~ \015
\015

64. In Scientology, \015
Hubbard's instructions must be followed exactly, with no deviation. These \015
documents and others with similar instructions to harass have been \015
followed in this lawsuit and all the other lawsuits in which Scientology \015
has been involved. \015
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65. The Scientologists accuse defendants Dr. Geertz \015
and Mr. Fishman of harassing tactics. Yet it is the Scientologists who \015
are compelled by their most fundamental scriptures to harass perceived \015
enemies of Scientology unceasingly, including judges, defendants, their \015
counsel and the Scientology experts retained in this case. 66. The Hon. \015
Ronald E. Swearinger became a target of Scientology harassment while he \015
was presiding over the case of Larry Wollersheim v. Church of Scientology \015
of California, #C 332 027. In the document attached as Exhibit 8, "Linda" \015
is Linda Hamel, who was In-Charge of the "Mission Find the Crimes" ("MFTC \015
I/O") in OSA, which was run directly by "Marty," who is Marty Rathbun, \015
Inspector General for Ethics in RTC. \015
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67. My husband Robert Vaughn Young \015
and I have been harassed and intimidated repeatedly since we became \015
experts in this case. Scientology operatives have stolen our trash. They \015
have slandered us to former associates. They have called us at all hours \015
of the night. High-level OSA operative Kurt Weiland sent my husband a \015
threatening letter. We have been followed and surveilled on several \015
occasions when we were able to spot the person following or surveilling \015
us; we have no idea how much more surveillance we have been subjected to \015
by operatives skilled enough to avoid being spotted. On one occasion we \015
were followed more than 100 miles from our home by a Scientology agent. My \015
husband spotted the agent and stopped our car, at which point the agent \015
pulled in behind us and stopped his car as well. My husband walked over \015
and asked him outright if he was a Scientologist, whereupon he admitted \015
that he was from the high- \015

security Scientology compound in Hemet and that he was following us under \015
orders from Scientology Command. \015
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68. These actions are embedded in the doctrine of Scientology. Scientologists have no choice but to adhere to these policies. CSI is Accusing the Defendants of Its Own Criminal Activities

69. L. Ron Hubbard invented a name for someone who accuses others of crimes that he himself has committed. In fact, Hubbard wrote a bulletin about this, which he called "The Criminal Mind." Ironically, Hubbard described himself and his alter ego, the Sea Organization, when he wrote that "THE CRIMINAL ONLY SEES OTHERS AS HE HIMSELF IS."

70. The thinking behind CSI's motion to dismiss is best explained by quoting Hubbard himself: "Apparently they add it up this way: 'If I accuse him of robbing, then it would be assumed by others that I have not robbed a bank.' By loudly voicing a condemnation of a crime, the criminal, with a crooked think, supposes people will now suppose he is above bank robbery and won't suspect him." (A copy of "The Criminal Mind" is attached as Exhibit 9.)

Scientology Doctrine Requires That Psychiatrists and Psychologists Must be Destroyed

71. There is another aspect of the Scientology doctrine which is highly relevant to this case, because Dr. Geertz is a psychologist. Scientologists are taught that psychiatrists and psychologists are the root of all evil in the world. According to Hubbard, psychiatry and psychology are behind a massive conspiracy to destroy Scientology and, with it, man's only hope for salvation. Therefore, all psychiatrists and psychologists, including Dr. Geertz, are Fair Game as far as Scientologists are concerned.

72. Hubbard taught that the world must be protected from psychologists and psychiatrists at all costs. Hubbard wrote many, many scriptures and recorded many lectures in which he vilified, ridiculed, attacked, and blamed all the ills of the world on the mental health profession.

73. The vitriol in Hubbard's attacks has three sources. First, much to Hubbard's surprise and chagrin, the mental health profession did not embrace either Hubbard or Dianetics, Hubbard's "Science of Mental Health." Second, and even more offensive to Hubbard, was the fact that his often dangerous techniques were labeled as quackery. Third, and perhaps most important, Hubbard regarded the mental health profession as a well-established and deeply entrenched competitor for monies which might otherwise flow to him and to Scientology.

74. The following sampling makes clear the degree of Hubbard's loathing and contempt for these professions, and shows that Scientologists will stop at nothing short of total obliteration of these professions.

75. In 1970 Hubbard wrote "The Psychiatrist at Work" (attached as Exhibit 10). he attacks psychiatry as follows: ". . . psychiatry is making insane people. This is why the insanity statistic is soaring and why the crime statistic is on a wild climb.... The psychiatrist has masters. His principal organization, World Federation of Mental Health, and its members, the National Associations of Mental Health, the 'American' Psychiatric Association and the 'American' Psychological Association, are directly connected to Russia. . . It goes without saying that the savagery and

fraud of psychiatry must cease and that auditors must encourage in state\015 and public and through all their connections displacing psychiatric abuses\015 with sane auditing." \015

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76. Obviously, psychiatrists and psychologists were\015 evil because their services **competed** with Scientology auditing. In a 1971\015 document by Hubbard called "Confidential" (attached as Exhibit 11), he\015 wrote: "Policy is that we assign any case or upset in Scientology to past\015 damage and interference with the person by medicine or psychiatry. They\015 were sent to us after medicine or psychiatry had already destroyed them.\015 We cannot be blamed for psychiatric or medical failures. "By continually\015 repeating this, make the AMA, Nats [National Associations of Mental\015 Health], etc. very wary of using our name on these psychiatric and medical\015 failures. Both subjects are guilty and the statement is demonstrably true.\015 Use it often. Make it known to the enemy that this is our policy as a\015 restraint on their fetid imaginations: "Every time you attack us we will\015 disclose more records of your failures.'" \015

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77. In another 1971 document of\015 the same date, entitled "It is time we begin to label Psychiatry for what\015 it is, the greatest failure of the Nineteenth Century. Every notorious\015 criminal and defector of the Twentieth Century was in psychiatric hands\015 before the crime. Burgess, McLean, the Texas Tower murderer, Manson and\015 all the rest were psychiatric failures first. Every infamous modern\015 assassin was a psychiatric failure. Psychiatric victims are endless\015 trouble to our society. We are tracing social turmoil, unrest, widespread\015 drug addiction to psychiatry. "We wish to issue a public warning that\015 psychiatry kills. We in Scientology stand ready to help anyone, and help\015 Governments rid themselves of psychiatric crime. There is urgency in this.\015 In too many cases we are asked to repair persons already maimed beyond\015 human tolerance by psychiatric interference and brutality. We blame\015 psychiatric failure for the state of modern society. We will do all we can\015 to help, but Nineteenth Century Psychiatry must go. We have never had a\015 failure or upset that psychiatry had not first ruined." \015

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78. In 1980\015 Hubbard wrote "Criminals and Psychiatry" (attached as Exhibit 13). In it\015 Hubbard said: "Almost every modern horror crime was committed by a known\015 criminal who had been in and out of the hands of psychiatrists and\015 psychologists, often many times.... "The most charitable look at this\015 would be that the psychologists and psychiatrists are simply incompetent.\015 B. . other more sinister implications can be drawn.\015

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"Developed in the latter part of the nineteenth century, they appeared on\015 the militaristic scene of a rearming and conquest-minded Germany. At that\015 time, the arch criminal Bismarck was laying the groundwork for the\015 slaughters of World War I and World War II. It fitted with the philosophy\015 of militarism that man was an animal and that there was neither soul nor\015 morality standing in the way of the wholesale murder of war. "Up until\015 that time the Church had some influence on the state and possibly some\015 power in restraining bestiality and savagely insane conduct, but small as\015 it might have been, it was incompatible with the unholy ambitions of the\015 militarists. That man was only an animal after all, soulless and entitled\015 to no decency, was bound to be a popular doctrine. That insanity consisted\015 of urges to harm others would have been a very unpopular idea to\015 government heads who had nothing else in mind. . "Spawned by an insanelly\015 militaristic government, psychiatry and psychology find avid support from\015 oppressive and domineering governments.... "The credence and power of\015 psychiatry and psychology are waning. It hit its zenith about 1960; then\015

it seemed their word was law and that they could harm, injure and kill\015 patients without restraint. The appearance of an actual technology of the\015 mind-- Dianetics and Scientology--has played no small part in acting as a\015 restraint. At one time they were well on their way to turning every baby\015 into a future robot for the manipulation of the state and every society\015 into a madhouse of crime and immorality. "The world is turning, things\015 change. And there may come a day when the mad dogs of the world are not\015 given over to the charge of mad dogs. But that will be to the degree that\015 you successfully carry forward Dianetics and Scientology." \015

79. In a 1981\015 document called "Diabetics and Scientology Compared to lath Century\015 Practices" (attached as Exhibit 14), Hubbard wrote: "A comparison between\015 Dianetics and Scientology and psychology and psychiatry is nonsense. "The\015 two lath century subjects, psychology and psychiatry, do not achieve ANY\015 good results. On the contrary they are destructive beyond belief. They\015 make crackpots, sexpots and vegetables when they do not outright kill....\015 "The character of the Governments themselves is established by their\015 tolerance and use of psychology and psychiatry. In no human race of any\015 civilized repute has any law condoned broad mayhem and murder of their\015 populations. Yet under modern governments psychology and psychiatry not\015 orly have carte blanche but also get insistence on their use... "Is this\015 a ivilized world we're living ... "I'm afraid it only will be when\015 Dianetics and Scientology can bring wisdom enough to Man to blunt his\015 furious efforts to do himself in." \015

80. In 1982 Hubbard wrote "The\015 Criminal Mind and the Psychs" (attached as Exhibit 15), which states, in\015 part: "It has often been noted (and routinely reported in the papers)\015 that criminals 'treated' by psychologists and psychiatrists go out and\015 commit crimes. "It could be suspected that these 'practitioners' used\015 pain-drug-hypnosis and other means (under the guise of treatment) to\015 induce the criminal to go out and commit more crimes. And possibly they\015 do.... "So let us look at psychs again -- what they call 'treatment' is a\015 suppression (by shocks, drugs, etc.) of the ability to think. They are not\015 honest enough, these psychs, being just dramatizing psychotics themselves\015 for the most part, to publish the fact that all their 'treatments'\015 (mayhem, really, when it is not murder) make people more stupid.... "The\015 answer to crime is rising IQ. But only the Scientologist can do that." \015

81. In another 1982 document called "The Cause of Crime" (attached as\015 Exhibit 15), Hubbard wrote: ". . . So what IS the cause of crime? The\015 treatment, of course! Electric shocks, behavior modification, abuse of the\015 soul. These are the causes of crime. There would be no criminals at all if\015 the psychs had not begun to oppress beings into vengeance against society.\015 "There's only one remedy for crime--get rid of the psychs! They are\015 causing it!.. "The psychs should not be let to get away with 'treatment'\015 which amounts to criminal acts, mayhem and murder. They are not above the\015 law. In fact, there are no laws at all which protect them, for what sane\015 society would sanction crime against its citizens even as science? They\015 should be handled like any other criminals. They are at best dramatizing\015 psychotics and dangerous, but more dangerous to society at large than the\015 psychotics they keep in their offices and loony bins because they lie and\015 are treacherous. Why the government funds them I do not know. They are the\015 last ones that should be let loose to handle children." \015

82. In another\015 1982 document entitled "Pain and Sex" (attached as Exhibit 17), Hubbard\015 announced that psychiatrists and psychologists (collectively called\015

"psychs") had been behind all of our troubles for millennia (and he also\015 revealed his bizarre view of sexuality): "There are two items in this\015 universe that cause more trouble than many others combined. "One is PAIN.\015 "The other is SEX.... "Despite the false data of Freud, psychologists,\015 psychiatrists and other criminals, they are not native to a being. They\015 are only artificial wavelengths. They have exact frequencies that can be\015 manufactured.... "Destructive creatures who do not want people big or\015 reaching--since they are terrified of punishment due to their\015 crimes--invented pain and sex to shrink people and cut their alertness,\015 knowing Ness, power and reach.... "Pain and sex were INVENTED tools of\015 degradation.... "Combined, pain and sex make up the insane\015 Jack-the-Rippers (who killed only prostitutes) and the whole strange body\015 of sex murder freaks, including Hinckley who shot President Reagan], and\015 the devotees of late night horror movies. Under the false data of the\015 psychs (who have been on the track a long time and are the sole cause of\015 decline in this universe) both pain and sex are gaining ground in this\015 society and, coupled with robbery (which is a hooded companion of both),\015 may very soon make the land a true jungle of crime . "Go into any asylum\015 or a prison and look at the increasing institutional population and know\015 what you are looking at. In the main, these are pain and sex addicts,\015 decadent and degraded and no longer capable. They were sent on that route\015 down through the ages by the psychs and here they are still in the psych's\015 h ds! And do they get well or go straight? Oh no. Whether in prisons or\015 insane asylums, they just get worse. And the psychs in both places rub\015 their bloodied hands as they turn their products loose again upon the\015 remaining population! It's no accident. And the stocks-in-trade of psychs\015 are PAIN and SEX." \015

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83. There are many, many more documents and tapes\015 which comprise Scientology doctrine about the evils of psychiatry and\015 psychology. As far as the Scientologists are concerned, the world would be\015 much better off if all the psychiatrists and psychologists were to\015 disappear, leaving Scientology to move into the field of mental health and\015 take it over. The Scientologists actually believe that this would be the\015 best thing that could happen to humankind.\015

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84. Furthermore, as far as the\015 Scientologists are concerned, anyone who would subject himself voluntarily\015 to years of hypnosis, as Mr. Fish man did, is already so far gone that\015 there is really nothing that can help him. Orthodox Scientology holds that\015 a person as damaged by psychology as Scientologists believe Mr. Fish man\015 t be might as well drop his current body, pick up another body and start\015 over again.\015

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85. So these two people, Dr. Geertz and Mr. Fish man, are so\015 degraded by choice of profession and decision to seek help from a\015 conventional mental health professional that each of them is infinitely\015 expendable in the eyes of Scientology. See Exhibit 2 for an example of the\015 kind of treatment a psychiatrist who publicly criticizes Scientology can\015 expect from a Scientologist. Fish man's Experience in Scientology Drove\015 Him to a Psychotic Break.\015

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86. I have read Steven Fish man's book, The\015 Lonesome Squirrel, and I have reviewed his testimony up to his sentencing.\015 I have viewed a 1981 videotape of Fishman under hypnosis by Dr. Uwe\015 Geertz, and I have viewed a 1989 videotape of Fishman being interviewed by\015 his attorney Mark Nurik and Dr. Richard Ofshe in Fish man's home in\015 Florida. Based on the review of these materials and my knowledge and\015 experience in Scientology, I do\015

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I do not believe there is any doubt that Steven Fishman was driven to a\015 psychotic break (known in Scientology as "Type 3 PTS," a term which I\015 will explain below) by Scientologists, either deliberately or through\015 greed and gross negligence of his welfare.\015

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87. It is utterly forbidden\015 for anyone with a serious psychiatric background, including an extensive\015 history of hypnosis such as Fishman had, to be allowed to have any\015 Scientology processing at all. Attached hereto as Exhibit 19 is a copy of\015 Hubbard Commincation policy letter entitled "Illegal Pus, Acceptance of\015 High Crime PL." I have been advised by Mr. Berry that it was well known\015 by Scientology operatives that Fishman was not eligible for processing\015 because of his history of therapy with Dr. Uwe Geertz; yet he was induced\015 to buy more than \$100,000 worth of Scientology books, written materials,\015 prints and E-Meters, clearly being led to believe that he would be\015 welcomed into the privileged circle of dedicated Scientologists.\015

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88. It\015 is highly significant that he was induced to purchase three E-meters\015 (electro-psychometers), the device used in Scientology auditing. E-meters\015 are not used for anything else but auditing, and they are not supposed to\015 be sold to anyone without proof that they are in training as an auditor.\015
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89. **But in the Scientology world there is a thing called statistics, and\015 Fishman was an unsuspecting victim of this system. Every single staff\015 member in a Scientology organization has a statistic which measures his or\015 her production. These statistics are reported every Thursday to\015 International Management in CSI and RTC. For Scientology staff members,\015 their lives virtually revolve around making sure their statistics are\015 rising every week. Many things depend upon this. If their stats are down\015 they may not be paid that week. They may not be allowed to spend any time\015 with their spouse or children. They may not be allowed any time off at\015 all, and since they already work as much as 14 to 18 hours a day or more,\015 one day or even half a day off becomes very important, even if it is only\015 enough time to do laundry. If their stats continue to go down over a\015 period of time, they risk being assigned to the Rehabilitation Project\015 Force or "RPF," which is a Scientology prison camp. Needless to say,\015 people can become quite desperate under these circumstances, ~~and~~ they will\015 do just about anything to get their statistics up.\015**

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90. Nowhere in\015 Scientology is the push for statistics more frenzied than in the\015 departments responsible for bringing money into the organization.\015 Unfortunately Fishman appears to have been the unwitting victim of a\015 feeding frenzy which involved at least nine different Scientology\015 corporations. These people discovered that Fishman had money and that he\015 was willing to give it to Scientology. They took his money even though\015 they knew he would never be able to receive any benefit from Scientology\015 auditing, even though they knew he could harm himself with the materials\015 they were selling him, particularly because they also sold him E-Meters.\015 Indeed, it is clear that Fishman was overwhelmed by the Scientology\015 materials he was given, to the point of an actual psychotic break.\015

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91. To understand how this could have occurred it is necessary to explain\015 briefly\015 how Scientology processing works. In essence, the theory behind auditing\015 is that by confronting painful incidents in the past one can free up\015 mental energy that has been locked up in these painful memories. L. Ron\015 Hubbard created many auditing processes which are supposed to help an\015

individual achieve greater sanity. But he made it clear that the processes\015 must be done in a precise way with no deviation. There are severe\015 penalties for anyone who deviates from the standard procedures. Hubbard\015 made it clear that it can be very harmful psychologically and even\015 physically to deviate from these procedures.\015

\015

92. Certain situations can\015 cause a person to have trouble in auditing. The most serious thing that\015 can hinder a person's progress up the "Bridge to Total Freedom" (as the\015 exact series of auditing processes is known) is becoming a Potential\015 Trouble Source, or PTS. A PTS is someone who is being suppressed in some\015 way by another person or entity.\015

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93. There are different types of\015 PTSness. Some of these are listed in an October 27, 1964, policy by\015 Hubbard known as "Policies on Physical Healing, Insanity and Troublesome\015 Sources." Attached hereto as Exhibit 20 is a copy of Hubbara\015 Communications Office Policy letter entitled "Policies on Physical\015 Healing, Insanity and Troublesome Sources". Ten types of PTSness are\015 listed in this policy letter, each one of which has to do with types of\015 people who have caused Scientology "considerable trouble." They include\015 people who have sued the church, newspaper reporters, family members who\015 are hostile to Scientology, etc. They are listed as Type A through Type\015 J, thus the policy has been nicknamed the "A to J policy." When someone is\015 labelled as being any of these types of PTS, he or she is barred from\015 getting any Scientology processing (auditing) or training, because people\015 who fall into these categories have historically caused trouble for the\015 organization, either by bringing legal action against it or by giving\015 negative information to the press.\015

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94. Steve Fishman was labelled Type A,\015 which is "persons intimately connected with persons (such as marital or\015 familial ties) of known antagonism to mental or spiritual treatment or\015 Scientology." He was also labelled Type C, which is "persons who have ever\015 threatened to sue or embarrass or attack or who have publicly attacked\015 Scientology or been a party to an attack and all their immediate families\015 should never be accepted for processing". Fish man was labelled Type C\015 because he had "paid a large amount of money for a set of Hubbard's taped\015 lectures which he had never received, and he had threatened to sue CSI\015 after trying for months to get his money back. (In Scientology one is\015 never supposed to step outside of the Scientology "justice system"; anyone\015 who does so, such as by filing a police complaint or a civil suit, is\015 immediately disqualified for Scientology services.)\015

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95. Furthermore,\015 because of his background of hypnosis, Fishman could never be eligible for\015 Scientology services.\015

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96. Despite the fact that he was declared PTS A and\015 C, and that it was known he had an extensive history of hypnosis by a\015 psychologist, thereby barring him permanently from Scientology auditing\015 and training, Fishman was sold over \$000,000 of Scientology materials,\015 including a huge collection of tape recorded lectures by Hubbard (which\015 are not supposed to be listened to until one reaches a certain level of\015 Scientology training), packs of material that are only supposed to be seen\015 by people in certain staff positions, and, what is most shocking, three\015 E-meters, one of which was specifically designed for use by auditors on\015 the confidential upper levels of auditing. It is specifically designed\015 for use in solo auditing, which is auditing of oneself. It is clear from\015 his videotaped interview that this is precisely what Fishman used it for.\015