

\015

\015

97. This created an explosive situation, one which clearly could lead to a\015 psychotic break in Fish man. Even as recently as September 1993, Ray\015 Mithoff, Senior Case Spervisor International, the most senior Scientology\015 technical expert in the world, supervised the auditing of a person in\015 England who had had a psychotic break as a result of her experiences with\015 Scientology. A copy of Scientology's report on this incident is attached\015 hereto as Exhibit 21. This person had a psychiatric history, and the\015 mixing of psychiatric techniques with those of Scientology had caused the\015 psychotic episode. So it was obviously known that Fishman risked a Type 3\015 psychotic break if he were allowed training or auditing, yet he was sold\015 thousands of dollars worth of materials anyway, including an E-meter with\015 a solo auditing capacity permitting him to self audit. Thus, either\015 intentionally or out of greed and negligence, Scientology created a\015 situation in which Fishman would almost certainly suffer a psychotic break\015 and become a Type 3 PTS, as explained below.\015

\015

98. The types of PTSness\015 described earlier, Types A through J, relate to different types of threat\015 a person can pose to Scientology. There are also three types of PTSness,\015 known as Type 1, Type 2 and Type 3, which relate to a person's own state\015 of mind and physical health. A person will manifest PTSness through a\015 range of conditions, all the way from a minor cold to a more serious\015 illness (all illness is a sign of PTSness) to full-blown insanity. All\015 PTSness is the result of being connected to one or more suppressive\015 people, suppression being defined as "a harmful intention or action\015 against which one cannot fight back." A copy of a Hubbard Communications\015 Office Bulletin entitled "Seach and Discovery" and describing these PTS\015 types is attached hereto as Exhibit 22.\015

\015

99. Type 1 PTS means that the\015 suppressive person is actively suppressing the person in present time. To\015 handle this a person is interviewed by someone who helps them spot who is\015 suppressing them, whereupon the illness (a cold or whatever) is supposed\015 to vanish.\015

\015

100. Type 2 PTS means that the person was connected to the\015 suppressive person earlier, either in this lifetime or an earlier lifetime\015 (it might have been 150 years ago, or 76 trillion years ago - whatever the\015 person thinks). Someone in present time reminds the person of the actual\015 suppressive person, and this is making the person sick. Curing Type 2\015 PTSness requires extensive auditing, usually on the PTS Rundown.\015

\015

101. Type 3 PTS is the Scientology term for a full blown psychotic\015 episode. It\015 was my experience in Scientology that when a person has a psychotic break\015 they lose touch with the real world and begin to hallucinate or imagine\015 conversations, events,\015 people, and whole scenarios. Even after they recover they are\015 never sure what part of the experience was real and what they\015 imagined\015

\015

\015

(Even after they recover they are) never sure what part of the experience\015 was real and what they imagined.\015

\015

102. The subject of Type 3 PTS cases is one of the dark secrets of\015 Scientology. No one is supposed to talk about it outside of Scientology,\015 and it is treated with utmost security when someone becomes Type 3 PTS.\015

The reason for this is obvious: people are not supposed to be driven insane by Scientology, so it would be a public relations nightmare to try to explain it. But more importantly, the treatment of people who have psychotic breaks in Scientology is a clear abuse of the mental health laws, and if such treatment were brought to the attention of mental health officials there is little doubt that Scientology would be subjected to public scrutiny for its practices in this area.

103. A number of things can trigger a psychotic break, or cause a person to "go Type 3," as they say in Scientology. In his Health, first book, Dianetics: The Modern Science of Mental Hubbard's term for "mental voices" was "demon circuits." Later he made it clear that what is actually occurring when someone has a psychotic break or "goes Type 3" is that all of his body thetans or BTs have become upset and are all talking to him and through him at once.

104. In Fish man's case, it is unclear whether he was driven to this state of mind purely through fraudulent irresponsibility and negligence, or whether it was done more deliberately, as described in the following Hubbard lectures.

105. In a number of taped lectures Hubbard said that a person could be driven insane through the deliberate application of what he called Black Diabetics. This is his term for a method in which the normally therapeutic methods of Dianetics and Scientology are reversed and the person is deliberately driven mad.

106. In a September 17, 1951, tape called "Some Notes on Black Dianetics," Hubbard stated: "A person can drive himself quite mad with Dianetics without any trouble. What you have concentrated on in your study of Dianetics has been the process of making people well. That is your emphasis line. But don't think for a moment that that is any more than half of it. There is as much data on how to make people insane, uncomfortable, sick or dead as there is on how to make them well." A copy of the transcript of this taped lecture is attached hereto as Exhibit 23.

107. It is possible that such techniques were used on Fishman, first to induce him to break the law for Scientology and then to try to get him to commit suicide, leaving a note absolving the church of all responsibility. Having failed to do this, church operatives could have deliberately driven him to the point of a psychotic break.

108. Hubbard explained how to do it in the following passage from "Some Notes on Black Dianetics": "With Black Dianetics, you could tailor make any kind of insanity you wanted to. The person might not manifest this the next day, maybe not the next week or maybe not for thirty days. Maybe three months later he is walking down the street and feeling a little bit tired when somebody honks an auto horn just right or something of the sort, and all of a sudden he goes crazy, and there he is - insane!"

109. In that same lecture Hubbard provided a blueprint for getting someone incarcerated, just as Fishman was, without anyone ever finding out that the person was set up: "We find that nobody can protest an implanted engram [meaning a hypnotic command given to a person such as was portrayed in "The Manchurian Candidate"] except the person into whom it has been implanted. He is the only one who can protest this. He is the only one who can sign

out a warrant. Even if he goes insane, nobody can sign out a warrant. So\015 he could say, 'Well, it was Bill and I know it was Bill and I saw Bill and\015 Bill has taunted me with it since,' and so forth, but if he has been\015 pronounced insane... he has lost his civil rights and he can't issue a\015 warrant. In other words, this is legal murder, legal punishment and so\015 forth. Because the law does not know anything about this, no laws exist to\015 prevent it or inhibit it." \015

\015  
110. In another tape called "The Complete\015 Auditor, Part I," delivered on June 28, 1951, Hubbard said: "Any one of\015 us could take a human being and, with malice aforethought, drive him\015 stark, staring crazy with greater efficiency than even psychiatry does.\015 What would you do to him? You would just reverse all the things that you\015 know would help him: ... slug him with some drugs, hit him in the face,\015 take a hypodermic needle to him so that you give him very painful but\015 unobservable somatic... Then when he comes out of it say this had never\015 happened to him, feed all the content back to him again by telling him\015 about other people's engrams or even his own, convince him that he does\015 not really know what his reality is and convince him that you are his\015 friend. A person can't take this; he would spin. That would be an\015 efficient job, but that could be done on a person who was pretty doggone\015 sane! n A copy of the transcript of this taped lecture is attached hereto\015 a. Exhibit 24.\015

\015  
111. In still another tape, called "Outline of Therapy,"\015 Hubbard stated: "Out of Scientology you could formulate a very fine type\015 of thought warfare. Works much better than an atom bomb. An atom bomb just\015 kills people, but you could take thought warfare and you could enslave\015 them utterly. You could make complete slaves out of them." copy of the\015 transcript of this taped lecture is attached hereto as Exhibit 25.\015

\015  
112. All of these instructions just quoted are part of the Scientology\015 "scriptures" Every word Hubbard ever uttered is considered to be sacred\015 doctrine, and Hubbard's instructions are taken quite literally by\015 Scientologists. It would be entirely possible for Scientology operatives\015 to take these instructions from Hubbard and use them to manipulate Fishman\015 for their own ends.\015

\015  
113. Hubbard himself ordered that "reverse processes"\015 (or Black Dianetics) be run on people he felt were particularly dangerous\015 to Scientology. In a 1968 issue he declared several people fair game\015 (meaning they could be lied to, tricked or destroyed), and instructed that\015 they be run on reverse processes if they ever came into an org.\015 Additionally, he ordered that "Any Sea Org member contacting any of them\015 is to use Auditing Process R2-45." This was a reference to the use of a\015 45 semi-automatic pistol. Hubbard defined R2-4s as a very fast way of\015 getting someone exterior to their body. (See Exhibit 26.) A copy of this\015 declare is attached hereto as Exhibit 27 (see item 7). Hubbard ode it\015 clear that he did not take suicide seriously in a taped lecture called\015 "Create and Confront," given on January 3, 1960, as part of the "State of\015 Man" lecture series. See Exhibit 28 for a transcript of "Create and\015 Confront," particularly pages 93 and 94.\015

\015  
114. Even if no one\015 deliberately set out to drive Fishman psychotic, selling him materials\015 that would completely overwhelm him with incomprehensible information and\015 then putting an E-meter in h,s hands was nothing short of criminal\015 negligence. There is little doubt that Fishman used his E-meters to\015 "audit" himself, an action that could easily drive him into a psychotic\015 break.\015

\015

115. In the tape "Some Notes on Black Dianetics," Hubbard himself\015 described the dangers of self-auditing: "...in Dianetics you are playing\015 around with highly explosive material. I would say that a person using\015 Dianetics in certain ways might much more happily juggle two or three hand\015 grenades with their pins pulled. For instance, take some of these people\015 who run around self-auditing: why don't they just go get a gun? That is\015 much simpler and quicker."\015

\015

116. When I was in Scientology I was assigned\015 to keep watch over a young girl in her early twenties who became Type 3\015 PTS after being forced to sever all communication with her family, because\015 they were upset about her involvement in Scientology. This incident\015 occurred in Hemet, California, at the high-security international\015 headquarters of Scientology.\015

\015

117. One day this girl approached me and\015 began to babble, making no sense at all. Recognizing the symptoms of\015 someone who was going Type 3, I immediately alerted one of the security\015 guards so that she could be put under watch. Sure enough, within an hour\015 she was in a full blown psychotic break. She did not know who she was or\015 where she was and she began to get violent. She lost touch completely\015 with the real world and began to hallucinate, imagining conversations,\015 events, people, and whole scenarios.\015

\015

118. L. Ron Hubbard wrote a series\015 of issues detailing what to do when someone "goes Type .3" These issues\015 comprise what is called the Introspection Rundown, a rundown being a\015 series of specific actions to take to achieve a specific result in\015 Scientology processing. Hubbard felt that the Introspection Rundown was a\015 major breakthrough in the handling of psychosis, and that people in mental\015 institutions could be cured by following these steps. A copy of the\015 Introspection Rundown is attached hereto as Exhibit 29.\015

\015

\015

119. The first step is to isolate the person completely from everyone\015 except the people assigned to watch over the person. This is called\015 "Isolation Watch." I was assigned to watch this girl, so I studied the\015 issues to ensure I would handle her correctly. We were not to say a word\015 around her. She was to have complete silence to allow her to calm down (to\015 allow her body thetans to go back to sleep, although she could not be told\015 about this, since she was not up to that level in her processing). This\015 went on for many days as she was in a serious psychotic incident. None of\015 the people assigned to watch her had any formal training in dealing with\015 psychosis.\015

\015

120. She had no idea who she was. One moment she would think\015 she was a butterfly; the next minute she would think she was Hubbard's\015 daughter, Diana Hubbard. Then she would think she was a dog, and she would\015 bark and growl. We had to be very careful to watch her so that she would\015 not try to kill herself, and we also had to be sure she did not get\015 violent and hurt us or become destructive of property.\015

\015

121. She was never\015 referred to any mental health practitioner, because Scientologists believe\015 that all psychiatrists and psychotherapists are completely evil. Hubbard\015 preached the evils of psychiatry so thoroughly that no one in Scientology\015 would ever consider letting a mental health practitioner examine anyone,\015 even someone who is in the middle of a psychotic episode. See several\015 examples of Hubbard's writings on psychiatry attached hereto as Exhibit\015

30. This girl was not even given anything to calm her down except a\015 mixture of calcium and magnesium which was supposed to relax her and let\015 her sleep. It did not have that effect; this girl could hardly sleep at\015 all and soon became exhausted, which simply compounded the problem.\015

\015  
122. After several weeks of this, the girl finally came out of the psychotic\0 episode and was immediately sent back to her family to avoid a negative\015 public relations situation or, possibly, a lawsuit.\015

\015  
123. A more serious\015 incident occurred when a staff member with extremely confidential\015 knowledge of the legal and corporate maneuverings of Scientology became\015 Type 3 PTS. Her name was Cat Morrow and she had been part of a project\015 called MCSS, for Mission Corporate Category Sort-out that was supposed to\015 create a corporate structure to protect Hubbard from civil or criminal\015 action. Cat had information about inurement to Hubbard and about\015 conspiracy within the church to cover it up that would be disastrous if it\015 were ever leaked. So when she had a psychotic break it was of the utmost\015 importance that the situation be kept quiet.\015

\015  
124. Cat was taken to the\015 home of a wealthy Scientologist outside of Los Angeles. The house was\015 surrounded with woods and there were no other houses in sight. There Cat-\015 was kept under 24 hour watch, known as "Isolation Watch" because the\015 person is isolated from everyone except those on the "watch." Although I\015 was not assigned to watch her, I was told that Cat became extremely\015 violent on several occasions, that she tried to jump through a plate glass\015 window, that she repeatedly said she wanted to kill herself, and that she\015 had no idea who she was or what she was doing. This went on for several\015 months.\015

\015  
125. I was told that when Cat came out of the psychotic break she\015 was audited on the Introspection Rundown. This is a series of questions\015 and procedures designed to get the person to stop introspecting, based on\015 Hubbard's belief that this would cure the psychosis. On someone who is\015 OTT, as Cat was, the Introspection Rundown is audited on the body thetans\015 that have gone out of control and caused the psychotic break. The theory\015 is that once these body thetans are disengaged from the person's body, the\015 person will be able to get back in control of his or her own mind again.\015

\015  
126. Maggie Butterworth, former OSA operative David Butter worth's wife,\015 was usually assigned to supervise any Scientologist in Los Angeles that\015 had a psychotic break, and I believe that she was in charge of Cat Morrow,\015 in close liaison with Sandi Wilhere, a highly trained case supervisor in\015 CSI who used to be one of the most senior technical experts in Scientology\015 (Miscavige reportedly demoted her to kitchen maid recently).\015

\015  
127. Cat Morrow's case was particularly sensitive not only because of the\015 information that Cat had about the church's legal affairs but also because\015 she was married to Jim Morrow, one of the key people involved in dealing\015 with the IRS. Cat's psychosis could not be allowed to compromise Jim's\015 position, so her situation required the highest security. Normally a staff\015 member who goes Type 3 is routed off staff or sent to the RPF after coming\015 out of the psychotic episode, but because Cat had dealt with such\015 sensitive material she was quietly reassigned to an unimportant department\015 where people could keep an eye on her and make sure she remained loyal to\015 Scientology.\015

\015  
128. A woman named Dorothy Geary was driven into a psychotic\015 episode under circumstances very similar to Steven Fish man's in that she\015

and her husband were coerced into giving Scientology a tremendous amount\015 of money for services they would never receive. Her husband Robert, a\015 dentist in Ohio, attended a seminar given by Sterling Management Systems,\015 which he later discovered was a front for Scientology. Robert and Dorothy\015 were both coerced into buying Scientology training and processing after a\015 Scientology "chaplain" orchestrated a breach between them which threatened\015 their marriage. Dorothy was then coerced into going to San Francisco for\015 processing, while her husband flew back to Ohio to continue his dental\015 practice.\015

\015  
129. While Dorothy was in San Francisco she was induced to buy\015 nearly \$100,000 worth of Scientology materials and services. She was so\015 overwhelmed from the processing she received and the "hard sell" she\015 experienced at the hands of Scientology salesmen that after approximately\015 one month she had a psychotic break. She did not know where she was and\015 was completely out of her mind. Her husband helped her to get home, but\015 then two Scientologists came to live at the Gears' house to try to bring\015 Dorothy out of the psychotic episode. However, the only "treatment" they\015 provided consisted of taking Dorothy for long walks.\015

\015  
130. Finally they\015 convinced Robert that Dorothy needed to fly back to San Francisco. Upon\015 a living in San Francisco, Dorothy was taken to a "mountain retreat,"\015 where no one else would see what was taking place. Dorothy was kept there\015 for two weeks, while her husband had no idea where she was.\015 Scientologists were trying to induce Robert to buy more auditing while\015 Dorothy was held in San Francisco.\015

\015  
131. Dorothy had been induced to buy\015 boxes and boxes of Scientology books and materials, all of which had been\015 shipped to their home in Ohio after she paid for them with credit cards.\015 When Robert opened the boxes and read some of the more advanced\015 Scientology materials, he realized what his wife had been subjected to and\015 called his family doctor for advice. His doctor gave a probable diagnosis\015 of an acute psychotic episode caused by trauma.\015

\015  
132. By the time the\015 Gears' attorney helped them both to disentangle themselves, they had given\015 Scientology close to \$180,000. As Robert Geary described it, "This was\015 money we obviously could not afford to spend and without extreme undue\015 influence there is absolutely no way we would have ever spent such sums. I\015 have read a considerable amount about mind control and now realize that my\015 wife and I were under mind control." A copy of the declaration of Robert\015 Geary D.D.S. executea September 5, 1993 is attached hereto as Exhibit 31.\015

\015  
133. There are certain people within the Church of Scientology,\015 particularly RTC and CSI, who have knowledge of many other cases of\015 Scientologists having psychotic, Type 3 PTS episodes. These people include\015 the following: Ray Mithoff, whose title was Inspector General for\015 Technology in RTC when I left in 1989, although I have been told that he\015 now has the title of Senior Case Supervisor International in CSI; Gelda\015 Mithoff, a highly trained auditor who has dealt directly with or\015 supervised number of "Type 3 handling"; Greg Wilhere, whose title was\015 Inspector General in RTC in 1989 and who is a highly trained auditor;\015 Sandi Wilhere, a highly trained auditor and case supervisor in CSI who at\015 last report had been demoted to cook in the communal kitchen at Hemet;\015 and, of course, Miscavige, who supervises virtually every aspect of\015 Scientology, particularly anything that might threaten the public image of\015 the church, such as Scientologists who have Type 3 psychotic breaks.\015

\015

134. The above-named individuals would be able to provide full details of the symptoms and manifestations of Type 3 PTSness and would be able to verify that Steven Fishman would never have qualified for Scientology processing so should never have been allowed access to Scientology materials or E-meters, certainly not a solo meter. They can also verify that all of the individuals who sold these materials to Fishman did so despite the fact that Fishman had already been declared ineligible for Scientology processing. The only question that remains to be answered is whether Fishman was driven to a psychotic break deliberately, or whether it was done simply out of greed and blatant disregard for his well-being.

CSI's Real Motive in Filing for Dismissal Was To Protect Its Managing Agents

135. CSI claims to be concerned about allowing several Scientology celebrities to be deposed. CSI says it does not want these people to be harassed by Dr. Geertz's attorneys. In truth, if it served CSI's purposes to have these celebrities deposed CSI would order the deponents to appear and not think twice about it. This much-touted concern for the celebrities is purely show. What CSI is actually worried about is that the tables have been turned on it in this case. The Scientologists can dish it out, but they cannot take it. They have finally met their match. Dr. Geertz's attorneys Graham Berry and Gordon Calhoun have educated themselves, with the help of several former Scientologists, about how this organization really operates, and they are not letting CSI get away with its usual harassment and intimidation tactics. This is the real reason CSI filed for dismissal.

136. Dr. Geertz's attorneys have parted the flimsy curtain of a corporate veil honored almost always in breach to reveal the true structure of authority in Scientology, the Sea Organization, and the people who really run Scientology, starting with Miscavige, the managing agent of the entire organization, and his key lieutenants, including Norman Starkey, Greg Wilhere, Mark Yager, Marty Rathbun and Ray Mithoff. Under Miscavige's direction, this organization has systematically violated the civil and human rights of its members, secure in the knowledge that because it calls Scientology a religion, it is protected by the First Amendment. Suddenly CSI is confronted by counsel assisted by experts who are fully aware that the Tech is applied both secularly and ecclesiastically. The veil provided by the misuse of First Amendment claims that every action by a Scientologist is religious and beyond scrutiny by the civil justice system has been parted. CSI's management has been delivered a clear and compelling message. CSI's management knew it could not maintain its facade of respectability and religiosity if CSI allowed this case to continue. That is why CSI moved to dismiss it on the eve of the trial.

religiosity if CSI allowed this case to continue. That is why CSI moved to dismiss it on the eve of trial.

137. Miscavige has filed a declaration in which he denies being the managing agent of the Scientology empire. He words his denial carefully, using the language of the corporate shell he created to shield his true position from the Courts. But the truth is that he does run it, either directly or via his key lieutenants. This is common knowledge within the upper echelons of the Sea Organization. Miscavige's position of power (and the power of his lieutenants) in Scientology is what was being protected by the filing of CSI's motion to dismiss. Therefore, the truth about Miscavige and the henchmen who carry out his

orders bears telling.\015

\015

Miscavige is the managing Agent of Plaintiff CSI\015

\015

\015

138. As stated earlier, I was a Scientologist for nearly 15 years, from\015 January 1975 until July 1989. I was in the GO and its successor (a name\015 change only), OSA, for most of that time. I also worked in another part of\015 Scientology called Author Services, Inc. ("ASI"). I was a Sea Organization\015 ("Sea Org") member during my tenure on all of these costs.\015

\015

139. All of\015

the positions I held from 1978 until 1989 enabled me to observe firsthand\015 the line of command and the organizational structure of Scientology. There\015 is no question whatsoever that Miscavige now holds the same position of\015 absolute power over Scientology, cutting across all corporate boundaries,\015 that Hubbard had before he died. Just as Hubbard was the managing agent\015 for the original mother church, CSC, Miscavige is the managing agent for\015 the current mother church, CSI, via his position as Chairman of the Board\015 of the Religious Technology Center ("COB RTC").\015

\015

140. I first became aware\015

o. Miscavige in 1981, when a coup took place within Scientology. ~~Until~~\015 ~~then there had been two arms~~ of Scientology. The Guardian's Office was run\015 by Mary Sue Hubbard and took care of everything external to the\015 organization, such as public relations, government relations, litigation,\015 and anything else that might hinder the expansion of Scientology. ~~The~~\015 ~~other branch~~, the Commodore's Messenger Organization ("COO"), ran\015 Scientology itself under the direct command of Hubbard (known as the\015 Commodore). Reality was directly contrary to Hubbard's repeated claims\015 that he had resigned all management responsibility in 1966. The CMO\015 directed all internal operations via an unincorporated group of highly\015 dedicated Scientologists known as the Sea Org.\015

\015

141. ~~In 1981~~, I was a\015

~~senior executive~~ in the United States Guardian Office ("US GO"). One\015 ~~evening we were informed that the GO was being taken over by the CMO. From~~\015 ~~that time on Miscavige has had complete control over all branches of~~\015 ~~Scientology~~.\015

\015

Miscavige Wields the Power Through a Small Circle of Lieutenants\015

\015

142. Miscavige wields his power through a small circle of\015 trusted Sea Org lieutenants who obey him unquestioningly. Until July 1989\015 when I left, his most senior aides were in RTC and included ~~Greg Wilhere~~,\015 who was the Inspector General ("IG"); ~~Marty Rathbun~~, who was the\015 Inspector General for Ethics ("IG Ethics"); ~~Ray Mithoff~~, who was the\015 Inspector General for Technology ("IG Tech"); and ~~Marc Yager~~, who was the\015 Inspector General for Administration ("IG Admin"). Another top aide was\015 ~~Norman Starkey~~, who was corporately the trustee of Hubbards estate.\015

\015

143. Based on testimony generated in this and other cases with which I am\015 familiar in my capacity as a consultant and expert and conversations with\015 high-ranking Scientologists who have left since I left in 1989, Miscavige\015 has reorganized his command structure and done away with the IG Ethics,\015 Tech and Admin posts. Miscavige has moved Ray Mithoff back to his old\015 position of Senior Case Supervisor International ("Senior C/S Int") in\015 CSI. He has moved Marc Yager back to his old position as Commanding\015 Officer of the Commodore's Messenger Organization International ("CO CMO\015 Int") in CSI. From the most recent decla- rations of Marty Rathbun and\015



Greg Wilhere, it appears that Miscavige has removed both of them from\015 their posts. They are now on the ship, the Freewinds, probably on the\015 Rehabilitation Project Force ("RPF"), which is the Scientology version of\015 a prison camp. For some reason Miscavige wanted both of them out of the\015 country as this case approached trial. This is probably because both\015 Wilhere and Rathbun have committed acts which may be violations of\015 criminal and civil law on Miscavige's orders. Many of the people\015 designated to be trial witnesses by Dr. Geertz's counsel were witnesses to\015 these unlawful transgressions. If Miscavige's lieutenants were to testify,\015 they would have faced exposure to perjury charges. They are also aware of\015 many wrongful acts which run afoul of criminal and civil law of which\015 Miscavige is directly guilty. There is a possibility that Miscavige's\015 lieutenants, when faced with the prospect of personal criminal liability\015 for perjury for false testimony designed to protect Miscavige, would\015 instead abandon their mentor when placed under oath and reveal what they\015 know, particularly if granted immunity.\015

\015  
144. Miscavige has other top aides in CSI whom he orders either directly\015 or via the RTC command lines.\015  
**These** CSI aides include the Watchdog Committee ("WDC"), which is a group\015 of Sea Org members who manage all of the different branches of\015 Scientology, both secular and non-secular. Other top CSI aides include\015 Kurt Weiland, who is the Commanding Officer of the Office of Special\015 Affairs International ("CO OSA Int"); Guillaume Lesevre, who is the\015 Executive Director International ("ED Int"); and ~~Heber Jentzsch~~, who is a\015 PR front man with the title of President of the Church of Scientology\015 International ("President CSI"). In reality, Heber has no administrative\015 power at all and his duties are solely to deal with media and other PR\015 groups.\015

\015  
145. The authority of the above-named individuals comes solely\015 from Miscavige. Any one of them can vanish overnight. Any one or all of\015 them can be sent to the prison camp known as the RPF if Miscavige even\015 suspects disloyalty. (This is undoubtedly what happened to Wilhere and\015 Rathbun.) Miscavige's authority over RTC, CSI and (via these two\015 corporations) the rest of Scientology, is absolute.\015

\015  
146. Since Miscavige\015 took over the Guardian's Office in 1981, he has had virtually total\015 control over the entire Scientology organization, including all branches\015 of Scientology management and extending out to every single person in the\015 world who is a Scientologist. No one can challenge his authority.\015  
Miscavige can expel anyone from Scientology literally with a snap of his\015 finger. In fact, "The Sea Organization Expansion News" contains a graphic\015 picture of Miscavige "declaring a former Mission Holder suppressive." (See\015 Exhibit 32.)\015

\015  
147. Miscavige derived his power directly from Hubbard, which\015 is why his power was and now is so absolute. Hubbard went into hiding in\015 1976 to avoid the IRS. Several government agencies around the world and in\015 the UPS. and a number of former Scientologists sued Hubbard. Miscavige\015 gradually took over as Hubbard's eyes and ears until finally, by 1981,\015 Hubbard allowed him to take over entirely.\015

\015  
Miscavige First Ran Scientology from Author services. Inc.\015

\015  
148. In 1981 Miscavige called\015 himself Special Project Operations ("Special Project Ops"). He set up\015 offices in the CMO building across the street from the big blue building\015 in Hollywood. From this position, he ran the entire Scientology\015

operation. He had several people working directly with him in a unit\015 called Special Project, including Norman Starkey, Terri Gamboa, Lyman\015 Spurlock, my husband Robert Vaughn Young, myself, and others. These people\015 ran all the PR, Legal and Intelligence runctions that had previously been\015 run by the Guardian's Office line of command. The primary focus was the\015 Mission All Clear, or the MAC Unit, in the Legal Division of the Guardian\015 Office. The purpose of this unit was to extricate Hubbard from all the\015 lawsuits that had been filed naming him as head of the church. Miscavige\015 was personally charged with extricating Hubbard from pending litigation so\015 Hubbard could come out of hiding.\015

\015  
149. Because Miscavige had the direct\015 communication line to Hubbard, he also had authority over all of the\015 internal Scientology Management personnel.\015

\015  
\015  
Scientology management personnel. All communications from Hubbard came\015 through Miscavige, and all communications to Hubbard went through\015 Miscavige. There were only two other people more senior than Miscavige,\015 Pat and Annie Broker. Their status arose because they were actually with\015 Hubbard. An order from Pat or Annie had as much authority as an order from\015 Hubbard because they were so close to him.\015

\\_5  
150. But Pat and Annie were\015 sequestered off at the Creston, California, ranch. Miscavige was at the\015 center of and actually directing Scientology activities. He used his\015 position of high visibility within the Scientology command structure to\015 run Scientology from the moment he became Special Project Ops.\015

\015  
151. In May 1982, Miscavige and the rest of the staff of Special Project\015 moved to a suite of offices on Sunset Boulevard and adopted the corporate\015 mantle of ASI.\015

\015  
152. Miscavige appointed himself COB of ASI. This title was for\015 consumption by the general public. Miscavige continued to identify himself\015 as Special Project Ops in correspondence with church personnel. Miscavige\015 appointed Terri Gamboa Executive Director of ASI. He gave Norman Starkey\015 the title Legal Affairs Director. Lyman Spurlock became Corporate Affairs\015 Director. Miscavige gave Robert Vaughn Young the title Public Affairs\015 Director, and so on. Miscavige assigned me the job of Organizing Officer\015 of ASI. As such, I was responsible for making sure the staff were doing\015 their jobs properly. If the staff failed in any way, I was charged with\015 correcting them.\015

\015  
153. During this time, and from 1981 until Hubbard died\015 in 1986, I observed firsthand Miscavige systematically replacing Hubbard\015 as head of Scientology. Publicly, ASI was promoted as a glitzy Hollywood\015 literary agency dealing exclusively with the works of Hubbard. But behind\015 the scenes, Miscavige was running all of Scientology from the ASI offices.\015

\015  
154. As an ASI staff member, I was instructed, and all those who worked in\015 ASI were also instructed, that making large amounts of money for Hubbard\015 was an integral part of running Scientology. Hubbard's written\015 communications to ASI staff revealed that he felt nothing but contempt for\015 his creation, the church of Scientology. He made it clear that he felt\015 perfectly justified in taking as much money out of the church as DM and\015 the other ASI staff could get away with. (Hubbard dictated all of his\015 communications and the dictation was then transcribed and distributed by\015 Miscavige. Both the dictation tapes and the dispatches still exist,\015 although CSI will undoubtedly deny it.) Hubbard made it very clear that\015