

Miscavige's success or failure would be based on how much money he could\015
make for Hubbard, whether it came from church coffers or other sources.\015
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155. Accordingly, Miscavige made sure that as much money as possible was\015
taken from church accounts. Fran Harris thought up labels, known in\015
Scientology as "significance," which were attached to huge lump sums which\015
Miscavige then ordered to be transferred from nonprofit church accounts\015
into ASI accounts every week. These labels were designed to conceal from\015
the IRS and other governmental agencies the true nature of the transfers.\015
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156. There was never any question that the staff at the non-profit\015
organizations would transfer the money as directed. Each of these\015
organizations and therefore each of the staff members was junior to\015
Miscavige. **If Miscavige ordered it done, it had to be done. If anyone\015
having responsibility over the financial accounts of the junior\015
organizations refused to follow orders from Miscavige he or she was\015
subject to immediate banishment to the RPF.** I was told by my superiors,\015
including Miscavige, that Miscavige was acting as Hubbard's deputy, and\015
that anything Miscavige ordered should be treated as an order directly\015
from Hubbard himself.\015

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157. The only thing that ever slowed these\015
transactions down was making sure the significance attached to the\015
transfer would appear legitimate to the IRS. Miscavige made Lyman Spurlock\015
responsible for working out the legal details of these transfers. I often\015
had to sit down with Lyman and help him calm down after he had been\015
ordered to legitimize some of Fran Harris's money-making ideas. Lyman told\015
me that he had had many serious disagreements with Fran about the legality\015
of at least some of her schemes. In my experience, when Lyman expressed\015
his doubts to Miscavige, Miscavige always sided with Fran. Miscavige's\015
instructions usually concluded with an order to Lyman to "make it legal."\015
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158. Miscavige also assigned Lyman the task of sorting out all of the\015
Scientology corporations so they would be legally defensible in the eyes\015
of the IRS and other governmental agencies. It was at this point that the\015
huge conglomeration known as Church of Scientology of California ("CSC"),\015
the predecessor "mother church," was split up into many different\015
corporations. Lyman worked out the whole shell, including all the\015
relationships between the different echelons.\015
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159. Lyman arranged for the\015
Religious Technology Center ("RTC") to have contracts with every single\015
corporation that uses Hubbard and Scientology trademarks and copyrights in\015
any way, including the management organizations, the service\015
organizations, the businesses that use Hubbard's books, and so on. The\015
real purpose of all of these contracts was to have a legal means by which\015
to collect monies from these entities, and to put anyone out of business\015
who refused to tow the line of Scientology orthodoxy as dictated by\015
Hubbard or any of his successors.\015
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160. Since Hubbard's death, Miscavige\015
has assumed the power and authority to put out of business any\015
Scientologist who refuses to tow the orthodox Scientology line as he\015
dictates it.\015
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161. I worked directly with Miscavige while I was at ASI. I\015
was horrified to discover that the senior-most person in Scientology, who\015

had daily contact with Scientologists and the public, was a ruthless, vicious, megalomaniacal tyrant. I had never worked with Hubbard personally, but I learned from others who had that Hubbard was the same way. I was told that Hubbard was prone to the same petulant tantrums that were daily occurrences with Miscavige.

162. Miscavige's style of management was exemplified by screaming profanities and terrorizing the staff. This is entirely consistent with the Hubbard Tech which features "Ethics Presence. n Senior managers are taught to manage by instilling fear and terror in their subordinates. As the most senior manager, Miscavige had to instill terror in all his subordinates in order to be in compliance with orthodox Scientology management techniques.

163. One day Miscavige gave me an insight into why he acted the way he did. He knew I did not approve of his cursing at the top of his lungs. We were having an executive meeting, and in the middle of a sentence he suddenly turned to me, very seriously, and said, "You think I yell loudly, but you've never heard anyone yell until you've heard LRH [Hubbard]. I'll never be able to scream the way he does. But Stacy, that's the only way to get compliance." This was confirmation that he was acting deliberately and calculatingly in accordance with the dictates of the Hubbard Tech. 164. I realized then that Miscavige was trying to become as much like Hubbard as he could, and that he was preparing to take Hubbard's place when Hubbard died.

165. Anyone who disagreed with Miscavige or challenged his authority in any way was branded by Miscavige as a traitor who was out to destroy Scientology. This was why David Mayo was ousted, along with most of his staff. Many others were thrown out in 1981 and 1982 and replaced with people who would obey Miscavige's orders unquestioningly. Ray Mithoff, who replaced Mayo, is today one of Miscavige's top lieutenants. John Nelson, head of the CMO and director of all the Scientology organizations, was also ousted by Miscavige and replaced by a loyal follower, Marc Yager. Today Yager is another one of Miscavige's top people.

166. Hubbard was still alive when I was at ASI in 1982, and every staff member in ASI was required to report to Hubbard every week on the status of his or her sector of Scientology.

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week on the status of his or her sector of Scientology. No one slept from Tuesday to Friday because Miscavige ordered that no one could leave until he had approved their weekly report to Hubbard. Miscavige repeatedly rejected the reports, insisting that they be rewritten until they were perfectly worded to appear that Miscavige had everything fully under control. No one was allowed to send any communication to Hubbard that wasn't edited by Miscavige (which meant that Hubbard effectively did not really know what was going on from 1981 until his death). This grueling schedule left the entire staff in terrible shape physically, and extremely vulnerable to Miscavige's brutal, coercive manipulation.

167. At that time the ASI offices were on the ninth floor of an office building in downtown Hollywood, yet people could hear Miscavige screaming down on the street, a block away. It was disgusting to see how he treated anyone he viewed as not fully "with him."

Miscavige's Treatment of his Staff was Horrific\015
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168. Jim Isaacson, for example, was in charge of investing\015 Hubbard's money, and he was expected to show a profit on a weekly basis.\015 Anyone familiar with the investment business knows this is not a realistic\015 expectation, but Jim's job depended upon his showing an increasing profit\015 every week. Predictably, Jim was not doing well at all. He was not eating\015 or sleeping. Miscavige was screaming mercilessly at Jim every day. Jim was\015 near the breaking point.\015

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169. One day Miscavige found out that Jim had\015 lost a large amount of money by investing incorrectly in the gold market.\015 Miscavige summoned two of his top lieutenants, Norman Starkey and Terri\015 Gamboa. Miscavige and Starkey literally dragged Jim into the conference\015 room.\015

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170. My office was right across the hall so I heard everything that\015 went on. For the next three and a half hours Miscavige screamed\015 profanities and wild, paranoid accusations at Jim, demanding to know who\015 had sent him to destroy Scientology, was he working for the IRS, was he\015 working for the FBI, what other enemy agents were working with him inside\015 Scientology, etc., etc., ad nauseam. I heard Jim repeatedly deny the\015 accusations, and Miscavige's response was to scream at him even more.\015

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171. Finally Miscavige threw open the door and stormed into my office. He\015 ordered me to go in and get the information out of Jim and not let him\015 leave until he'd confessed everything. I'd never seen anyone behave like\015 Miscavige before. (As stated above, while I was on this post and later\015 while I was in the RPF, I learned from others that Miscavige's behavior\015 mimicked Hubbard's.)\015

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172. Miscavige was very frightening. When he was\015 worked up his conduct was consistent with what I later learned was a\015 psychotic episode. Miscavige appeared to be completely out of control. He\015 screamed profanities at the top of his lungs directly in my face. Others\015 who went past my office kept their eyes averted and walked by as quickly\015 as possible. Finally, he marched down the hall (with Norman and Terri\015 following) and slammed the door of his office.\015

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173. When I went into the\015 conference room I found Jim collapsed on the table. His eyes were glazed\015 and he was shaking uncontrollably. Rather than complying with Miscavige's\015 order to continue the interrogation, I did my best to calm Jim down, as he\015 was clearly terrified, and told him to go home and get some sleep. Jim was\015 on the RPF within days.\015

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174. Part of Jim's terror arose from the fact\015 that Miscavige had already sent Jim's wife, Joyce, to the RPF for refusing\015 to go along with his brutal treatment of staff. I knew about this because\015 I replaced Joyce. I was dispatched to the RPF shortly thereafter because I\015 objected to the same abuses.\015

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175. No one could speak out against\015 Miscavige's terror tactics because there was no way to have a discussion\015 with him on the subject. The RPF filled up with people who tried to stand\015 up to him. He surrounded himself with people who were willing to do\015 whatever he ordered. I tried several times to protest and ended up in more\015 and more trouble as the weeks went on. Finally Miscavige lost his temper\015 at me one night and threw me into my office, locked the door, and screamed\015

at me until finally I felt I would lose my mind if he did not stop. I had\015 not slept for several days, and I snapped.\015

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Staff who were Critical of Miscavige Were sent to the RPF\015

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176. The next day I didn't go to work,\015

saying I was sick. I was afraid to tell anyone what had happened for fear\015 that Miscavige would separate me from my husband (another common tactic he\015 uses, as did Hubbard, to control people). Unfortunately confided in\015 someone I thought I could trust that Miscavige was brutal, tyrannical\015 bully. That person immediately reported me to Miscavige. That night at\015 four in the morning there was a loud knock on my door. It was the\015 Scientology security police. They took me to the RPF. That is how absolute\015 Miscavige's power is, and how immediate is the punishment for anyone who\015 doesn't completely submit to his authority.\015

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177. Miscavige charged me\015

with being an agent who had been sent in to destroy Scientology. He\015 claimed that I was working for Michael Flynn, an attorney who was\015 successfully litigating against Scientology at that time. He ordered me to\015 submit to what was known as a "gang-bang sec check. n Two very large,\015 strong men, Andre Tabayoyon and Rick Aznaran, locked me in a room and\015 interrogated me for hours. During the interrogation, they screamed and\015 swore at me. They accused me of all sorts of crimes against Scientology.\015 They demanded that I confess to being an enemy agent.\015

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178. Miscavige had\015

also ordered me to do the "Running Program" as part of the requirements\015 for getting off the RPF. This consisted of running around an orange pole\015 for 12 hours a day. I was supposed to do this until I had some sort of\015 realization about what was wrong with me, whereupon, presumably, I would\015 stop being critical of him.\015

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179. After one of the gang-bang sec check\015

sessions, I was extremely upset. I was not paying sufficiently careful\015 attention to where I was placing my feet as I ran around the orange pole.\015 I ran straight-legged into a pothole about a foot deep and smashed one of\015 my sacroiliac disks. This put me flat on my back. I was unable to walk. I\015 was under orders from a doctor not to move because he thought there was a\015 danger that I might suffer paralysis from movement before the swelling in\015 the disk subsided. I paid for the doctor myself, since Miscavige had\015 ordered that no one give me any assistance whatsoever and, indeed, I was\015 not paid at all for several months on the RPF.\015

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180. Despite my medical\015

condition, diagnosed by a Scientologist doctor, Miscavige issued orders\015 that I be sent to Florida to get me as far away from my husband as\015 possible. Miscavige said he was afraid I would turn my husband against\015 him. A Commodore's Messenger burst into my room one evening and ordered\015 me to pack immediately so that I could catch a flight to Clearwater that\015 night. I was to be transferred to the RPF at the Flag Land Base, another\015 Scientology compound. I protested, she continued to insist that I get up\015 until I was finally able to get her on the phone with the doctor, who told\015 her the church would be responsible if I ended up paralyzed.\015

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181. Although Miscavige allowed me to remain in Los Angeles, I was\015 imprisoned,\015

under guard, on the seventh floor of the building, so that I could not\015 escape and reach my husband. We were not allowed to see each other at all\015 for three months, and even our letters to each other were intercepted.\015

Neither of us knew what had happened to the other and it was agonizing for\015 both of us. I was under threat of expulsion and I believed that if I were\015 expelled I would never see my husband again. I was deathly afraid that\015 Miscavige would lie to my husband about me and turn him against me. I\015 finally convinced Miscavige that I was not a threat to him, and my husband\015 and I were allowed to see each other again. Miscavige Rules Via the Sea\015 Organization: There is No Corporate Integrity\015

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182. Horror stories like this could be told by any Scientology staff\015 member who has worked in close\015 proximity with Miscavige. The only people who will talk about him,\015 however, are those who have left, because as long as they are inside he\015 virtually holds the power of life and death over them. He can separate\015 them from the spouses, separate them from their children, keep them from\015 sleeping, keep them from eating anything but rice and beans, imprison them\015 for years in the prison camps known as the RPF. Miscavige's power is\015 absolute, and it has nothing to do with corporate boundaries. As did\015 ~~Hubbard before him, he wields his power via the Sea Organization, which is~~\015 ~~an unincorporated, fiercely dedicated group of Scientologists. It is the~~\015 ~~Sea Org that actually runs all of Scientology.~~\015

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183. Miscavige simply uses\015 t corporations, as Hubbard did, to manipulate the courts, the IRS and\015 other government agencies. The corporations were only created to fool the\015 outside world, the "wog world," as Sea Org members contemptuously call it.\015 Inside Scientology, the only boundaries are the ones Miscavige chooses to\015 create, just as it was with Hubbard before him, and everyone knows it. In\015 fact, now that Hubbard is dead, what Miscavige wants is senior even to\015 what Hubbard policy says. Miscavige can violate policy and break the law\015 whenever he wants to and no one can stop him. The 1982 Mission Holders'\015 Meeting Illustrates the Emptiness of the Corporate shell\015

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184. Miscavige and his RTC and CSI lieutenants can walk into any\015 Scientology organization and order anything they want or shut it down at\015 whim. Nowhere has there been a clearer illustration of the emptiness of\015 Scientology's corporate shell than the infamous Mission Holders' meeting\015 in 1982. A transcript of this meeting is attached as Exhibit 33. Although\015 Miscavige's profanity and many of his and his lieutenants' less elegantly\015 phrased comments have been edited out, several things are still clear.\015

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1 .. Miscavige, who at the time was officially COB ASI, was head of\015 Scientology and senior to everyone else there. The other speakers included\015 Lyman Spurlock, Corporate Affairs Director at ASI; Norman Starkey, Legal\015 Affairs Director at ASI; Ray Mithoff, Senior Case Supervisor International\015 in CSI; Marc Yager, CO CMO Int in CSI; Guillaume Lesevre, ED International\015 in CSI; Steve Marlowe, then Inspector General of the Religious Technology\015 Center (he was later sent to the RPF and replaced by Vicki Aznaran, who in\015 turn was busted and replaced by Greg Wilhere, who has since been busted\015 and, apparently, replaced by Miscavige himself, holding the position of\015 Inspector General as well as that of COB RTC); and Wendell Reynolds,\015 international Finance Dictator in CSI (he was later busted and spent\015 several years on the RPF).\015

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186. Miscavige, an employee and director of\015 ASI, and his lieutenants, whose employment spanned RTC, ASI and CSI, were\015 speaking directly to a group of people who held the franchise rights to\015 various missions (missions being the lowest organizations on the\015 Scientology totem pole). Yet there was no Scientology leaders, on\015 Miscavige's orders, expelled several mission holders on the spot that day\015

for being unhappy about what they were hearing, destroying their business\015 with a snap of the finger. On Miscavige's orders the mission holders were\015 ordered to pay large sums of money for a promotional campaign for the\015 original Dianetics book, under threat of being investigated for crimes\015 against Scientology if they refused. They were ordered to pay large sums\015 of money for many other "crimes," real or imagined, under threat of losing\015 their business if they refused. The result was hundreds of thousands of\015 dollars paid into CSI and RTC accounts from these missions.\015

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187. Hundreds of people, including many mission holders, were expelled\015 from the church\015 during that time. All people who criticized Miscavige or refused to comply\015 with his orders, regardless of status or organizational affiliation,\015 were subject to expulsion. Miscavige quickly made it clear that he could\015 order any Scientologist, anywhere in the world, to do anything he wanted.\015 See Exhibit 32 for a copy of "The Sea Organization Expansion News," "The\015 Sea Org Moves In!" copyrighted by CSI, which includes a photograph of\015 Miscavige expelling a Mission Holder. There is also another photograph\015 which shows Marc Yager, Miscavige, Norman Starkey, Guillaume Lreserve and\015 Ray Mithoff, among others, all identified by their Sea Org ranks even\015 though Miscavige and Starkey were ASI (non-church) staff at the time.\015 This is further evidence that these men are managing agents of CSI, which\015 was why Dr. Geertz wanted them deposed in this case.\015

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Miscavige Personally Ordered and Oversaw the Portland Crusade\015

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188. I was in the Office of\015 Special Affairs United States (OSA US) in Los Angeles in 1985 when a jury\015 awarded Julie Christofferson \$39 million in damages for being harmed by\015 Scientology. We had all expected to win the case. After all, Miscavige and\015 his top aides had been up in Portland running the whole thing directly.\015 How could we lose? There was champagne and a huge, sumptuous buffet\015 waiting for us, as soon as we received word on the victory.\015

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189. Instead, we got word that there was a \$39 million decision against\015 the church. It\015 was devastating. Dead silence fell throughout OSA US's offices. For an\015 hour, no one knew what to do. It was the most humiliating defeat\015 Scientology had ever had.\015

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190. And then suddenly all the OSA staff were\015 summoned into one of the legal offices. Miscavige and Norman Starkey, who\015 was Legal Affairs Director, ASI, at that time, were on the speaker phone.\015 The decision was an outrage, Miscavige told us. He told us he would not\015 permit it to stand. Every Scientologist from around the world was ordered\015 to Portland, immediately. We were to spread the word by whatever means\015 possible, arrange transportation, raise the money, do whatever we had to\015 do to get the Scientologists there. This was the beginning of what became\015 known as the Portland Crusade.\015

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191. The staff of OSA did nothing but run\015 various aspects of the Portland Crusade until the judge finally declared a\015 mistrial several months later. The entire operation was overseen by\015 Miscavige and his top staff. Planes were chartered to fly Scientologists\015 from Europe to Portland; donations were raised to print a special edition\015 of the church publication, FREEDOM, about the "Religious Freedom Crusade"\015 and distribute it door to door to every home in Portland. Miscavige even\015 ordered students to leave their Scientology courses (unheard of in\015 Scientology) to go to Portland.\015

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192. The best time to observe how the\015
Scientology command lines really work is during a disaster. The\015
Christofferson loss of 1985 was the biggest disaster Miscavige had ever\015
had to deal with, and all semblance of corporate integrity fell by the\015
wayside in an instant.\015

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Miscavige Crossed All Corporations When Hubbard Died\015

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193. The corporate structure was completely ignored again when\015
Hubbard died in January 1986. I was ordered to ASI and briefed, along with\015
a roomful of others from OSA US (Church of Scientology Western United\015
States, or "CSWUS"), OSA Int (CSI), CMO International (CSI), Gold (CSI)\015
and elsewhere, by Miscavige on what had happened. Then, although he had no\015
corporate authority over any of these organizations or staff, he went\015
around the room and gave each of us our instructions as to what we must do\015
in the transition to the post-\015

Hubbard era of Scientology.\015

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194. When Hubbard died, I was employed by an\015
organization called North Star. This was a non-church corporation I formed\015
to put FREEDOM Magazine, which I edited, at arm's length from the various\015
Churches of Scientology for tax purposes. I created a separate corporation\015
based on the advice of Scientology's lead\015

tax attorney, Chris Cobb, Esq.\015

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195. Although North Star was established as a subsidiary corporation of\015
CSI, in reality North Star was supposed to receive its operating\015
instructions from OSA US (CSWUS). We did receive instructions from\015
executives at OSA, but we also received instructions directly from ASI,\015
including Miscavige himself. He assigned us to do a research project for\015
the Hubbard biography. At the time, we were receiving direct orders from\015
both OSA and ASI.\015

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196. Miscavige ordered me to write the copy for a\015
eulogy of Hubbard. I worked directly with Norman Starkey and Miscavige to\015
finalize the copy, and Miscavige gave the final approval. Then, under\015
orders from Miscavige, I worked with Jonathan Epstein, a financial banking\015
officer who was part of CSI, to arrange for several hundred thousand\015
dollars to be pulled from various reserve accounts in a number of\015
different corporations. These funds paid for the eulogy to be placed in\015
major newspapers around the country as full-page ads.\015

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197. After the ads\015
were placed, Miscavige then ordered me to create a booklet about Hubbard\015
to be used for promotional purposes. Again he ordered Jono Epstein. (CSI)\015
to pull funds from various church corporations to pay for a massive\015
distribution of the booklet. Copies of the booklet were inserted in\015
several major newspapers in major cities. Thousands of copies were mailed\015
out. The cost for this project came to approximately 50 million and was\015
funded by reserve accounts from several church corporations, as ordered by\015
Miscavige.\015

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Today Miscavige Has Completely Consolidated his Power\015

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198. With Hubbard dead Miscavige moved quickly to consolidate his power. In\015
early 1987 he removed his only remaining challengers, Pat and Annie\015
Broker. He also switched his base of operations from ASI to RTC. It was a\015
bloody coup. Miscavige applied the scorched-earth policy to all who had\015
ever had a kind word for the Brokers. My husband, who had worked with Pat\015

Broeker, was sent to the RPF along with Vicki Aznaran, Greg Ryerson, Jesse\015 Prince, Spike Bush, and many others. Only those who had remained\015 steadfastly loyal to Miscavige were allowed to keep their jobs.\015\015\015

199. Today, the only people who survive are those who kowtow to Miscavige\015 unreservedly and completely. He has truly become Hubbard's successor. He\015 curses like him, screams like him, thinks like him, and rules with a\015 ruthless, iron hand and a contempt for the outside world just the way\015 ~~Hubbard did when he was alive.~~\015

200. Just as Hubbard did, Miscavige has\015 created many corporate layers between him and the courts, the IRS, other\015 governmental agencies and the outside world in general, and he deals them\015 like so many cards when it is convenient. But it is Miscavige who really\015 holds the power, and because he is COB RTC, RTC is the only Scientology\015 entity with any real power.\015

201. See Exhibit 34 for RTC Executive\015 Directive No. 450, dated 6 September 1991, from Miscavige to all\015 Scientologists. The first 22 pages of this document provide a valuable\015 glimpse of the world according to Miscavige, bizarre paranoia and all.\015

15\015
202. On page 22, Miscavige announces a general amnesty for all\015 Scientologists, meaning that anyone who has gotten into trouble in the\015 past is forgiven and can get back on the "Bridge to Total Freedom. This\015 amnesty cuts across all corporate boundaries. The document behind it,\015 Inspector General Network Bulletin No. 14, is from one of Miscavige's\015 lieutenants, former Inspector General for Ethics RTC Marty Rathbun. This\015 document explains to all Scientologists how to apply the amnesty. It also\015 cuts across all corporate boundaries.\015

203. CSI is only a lackey\015 corporation. The function of the staff members of CSI is to carry out\015 Miscavige's orders. If a CSI staff member refuses to comply with\015 Miscavige's orders he or she is removed from post and sent to the RPF. CSI\015 has no more independent authority than any other church or non-church\015 corporation in the Scientology network. Its authority (indeed, its\015 existence) is solely in the hands of Miscavige. If he decided to rearrange\015 the corporate structure again he could do away with CSI altogether and\015 create an entirely new corporation in its place. This is the extent of his\015 power over the Scientology network, including CSI and RTC.\015

204. There is\015 no one else who can represent Scientology. Everyone else is only speaking\015 in Miscavige's place. He is telling them what to say and what not to say,\015 and if they make a mistake, they will feel his wrath. If they make a big\015 mistake, they will go to the RPF. If they ever told the courts what they\015 really know, Miscavige would have them expelled from Scientology and\015 labelled Fair Game, like many others before them.\015

205. In short, the only\015 person who is in a position to talk about all of the inner workings of the\015 Church of Scientology is Miscavige, because he is the only person who will\015 not be punished for doing so. There is no one above him to punish him. He\015 alone can tell the whole truth. His lieutenants know the truth but can\015 tell what they know only if Miscavige gives them permission to do so.\015

206. Miscavige's key lieutenants are also Managing Agents of CSI\015

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206. As COB\015

RTC Miscavige controls Scientology via several key lieutenants who have\015 absolute authority to carry out his orders. Although their official\015 positions may have changed corporately as described above, they still\015 wield the same degree of power. If any of these people have been removed\015 from their positions recently, they can still testify about the power they\015 had before they were removed, and furthermore, they can testify that it\015 was on Miscavige's authority that they were removed. These lieutenants\015 include Greg Wilhere, who held the position of Inspector General RTC;\015 Marty Rathbun, who held the position of Inspector General for Ethics RTC;\015 Ray Mithoff, who held the position of Inspector General for Technology RTC\015 and has apparently since been moved to Senior Case Supervisor\015 International in CSI; and Marc Yager, who held the position of Inspector\015 General for Administration and has apparently since been moved to\015 Commanding Officer Commodore's Messenger Organization International in\015 CSI. Another top aide is Norman Starkey, who is the trustee of Hubbard's\015 estate and the Executive Director of ASI. He is also a troubleshooter for\015 Miscavige. Norman must be obeyed when he is operating under Miscavige's\015 orders.\015

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Ray Mithoff is a Managing Agent of CSI\015

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207. Senior C/S Int Ray Mithoff is a managing agent of CSI. He has\015 command lines via CSI to all churches, missions and any\015

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UWE GEERTZ, PH.D.
UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA
CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
non-profit religious
organization,

Plaintiff,

vs .

STEVEN FISHMAN AND UWE GEERTZ,

Defendants.
Case No. CV 91 6426 HLH (Tx)

DECLARATION OF ROBERT VAUGHN
YOUNG IN SUPPORT OF COST BILL
FOR DR. GEERTZ'S MOTION FOR
AWARD OF COSTS, EXPENSES,
ATTORNEY'S FEES AND SANCTIONS

Date: APRIL 4, 1994
Time: 10:00 a.m.
Courtroom: 7

[Filed and served
concurrently with Dr
Geertz's Bill of Costs]

DECLARATION OF ROBERT VAUGHN YOUNG

I, Robert Vaughn Young, declare that I am over 18 years of age and
am a resident of Newport Beach, California.