

INTRODUCTION

I have been retained as an expert consultant and expert witness by Dr. Uwe Geertz's counsel in the case captioned Church of Scientology International v. Steven Fishman and Uwe Geertz. *CV-6426-HLH (Tx) currently pending in the United States District Court, Central District of California. The statements herein are of my own personal knowledge or reasonably based upon information and belief, and if called upon as a witness, I can testify competently thereto.

This declaration is submitted in support of Defendant Dr. Geertz's motion for costs. fees. expenses and sanctions following the dismissal of this action with prejudice by the court on February 22, 1994.

My credentials as an expert on Scientology includes over 20 years as a staff member in the organization. In those 20 years, I have held nearly every type of position at every echelon. I have worked at the local, the regional, the national and the international levels. I have been a Scientology representative and spokesman before governmental bodies, the media and the courts. I have trained others on how to handle the media and governmental agencies. I have been the most senior public relations executive for Scientology world wide. I worked for years at the echelon that handles critics, "enemies," the media, judges, the courts and the government. I have been privy to documents and tactics of the most secret nature, including illegalities committed by Scientology executives and the means of cover-up. I have been called on many occasions to personally handle "hot" situations of the most sensitive nature ranging from the mysterious death of the son of Scientology Founder Ron Hubbard ("Hubbard") to the death of Hubbard himself. I have been privy to financial schemes and scams involving tens of millions of dollars. I also know how Scientology manipulates the law to avoid any revelation of the truth.

SCIENTOLOGY ADVOCATES USING THE
COURTS NOT TO SEEK JUSTICE BUT
TO HARASS AND RUIN PEOPLE

Plaintiff Church of Scientology International's ("CSI") request that this case be dismissed is in keeping with one of their most senior scriptures, "to use to courts to harass and ruin people rather than win. It has been a primary tactic since Hubbard gave the edict in 1955 when he wrote the purpose of bringing a lawsuit:

"The purpose of the suit is to harass and discourage rather than to win. The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, well knowing that he is not authorized, will generally be sufficient to cause his professional decease. If possible. of course ruin him utterly." (From Hubbard's 1955 "The Scientologist: A Manual of Dissemination of Material." Emphasis added. Attached as Exhibit A) The basic reason that Scientology does not use the courts for justice is because Hubbard believed the Scientology justice system he invented was vastly superior and that his system should become the planetary standard.
DR. GEERTZ IS THE TARGET OF

SCIENTOLOGY'S VOW TO DESTROY "THE PSYCHS"

The key to understanding the mystery of the current lawsuit and its tortuous route will be found in the above Hubbard directive plus one further element: Defendant Dr. Uwe Geertz is a psychologist. Scientology has vowed to destroy and take over the field of mental health. Thus Dr. Geertz

is the target of Scientology's equivalent of "The Final Solution," where a profession has become a universal scapegoat. PSYCHS ARE SCIENTOLOGY'S SCAPEGOAT FOR EVERYTHING INCLUDING SEX

It is drilled into every Scientologist's head that all troubles and problems - Hubbard's, Scientology's, America's, the world, this corner of the galaxy and literally the entire universe - are due to psychiatrists and psychologists, known collectively as "the psychs." In fact, Hubbard said the ONLY cause of crime is the "psychs." He even goes so far as to say "there are no laws at all which protect them. . ." from being attacked. (See Hubbard's "The Cause of Crime," Attached as Exhibit B. See also declaration of Stacy Young also filed this date.)

The "psychs" are Hubbard's scapegoat for all historical ills going back not merely scores of years but hundreds, thousands and even millions of years. In Hubbard's paranoid view, everything from rock and roll to the Third Reich and even sex itself were vile inventions of 'psychs'. (See "Pain and Sex." Attached as Exhibit C.) As incredible as that may seem, Hubbard actually believed that sex was literally invented by "psychs" millions of years ago. While he doesn't come out and say it, the implications are clear: all sex - even the attraction between couples - is bad.

The intensity of Hubbard's anti-sex (and especially anti-female) attitude is no known to many

Scientologists. Starting in 1981, I had full access to Hubbard's most private papers, diaries and letters. I continued to have unlimited access to it for years as part of the work to write a biography of Hubbard and was able to read letters to and from his parents, wives, mistresses, friends and business associates. There were hundreds of thousands of pages of material - much of it originals or carbon copies in his own handwriting - that detailed his views about his life, his wives, his family and sex. Much of this was written in the 1930s and 1940s but extended into the 1970s. Some of these papers were diatribes against females and were covered with red-ink drawings of genitalia around the margins of the pages. He also graphically described what he wanted to do to women, including hurting and raping them. Suffice it to say that it was x-rated and sadistic. This was my initiation into the dark side of Hubbard's views. (these papers were subsequently locked away so no Scientologist will even know they exist, let alone allow anyone to see them.)

Hubbard's anti-female attitude appeared first, in private writings in the 1930s and 1940s. His views of "the psychs" developed after the publication of his first Scientology books in 1950 when he was courting "the psychs" for approval of his system. When he was rebuked and criticized, he became incensed and began to blame them for his troubles with the press and his customers.

Thus Dr. Geertz is viewed as a part of the international (and intergalactic) conspiracy that must be annihilated before Hubbard and Scientology can reign on Earth.

CSI'S CASE IS PART OF
THE "FAIR GAME DOCTRINE"
AND "PSYCHS" ARE FAIR GAME

CSI has a Fair Game Doctrine where any "enemy" can be "destroyed." This doctrine is practiced against apostates, critics, the press and has even been used against courts. It has been practiced against Dr. Geertz (starting with this lawsuit that put him into bankruptcy) and his counsel in this case (ranging from an investigation that this court ordered

stopped to vandalism of Mr. Graham Berry's property.

I will show how the Fair Game Doctrine started. how it has continued to this day and how this court has been exposed to these end-justifies-the-means methods. I will present this using the writings (now called "scriptures") of Hubbard. These are the iron-clad policies of Scientology

"FAIR GAME": THOSE THAT HAVE NO RIGHTS;
THEY AND/OR THEIR PROPERTY
CAN BE DESTROYED

The doctrine of Fair Game was codified on March 7, 1965, when Hubbard issued titled "Suppressive Acts: Suppression of Scientology and Scientologists: The Fair Game Law" (Attached as Exhibit D) Hubbard wrote,

By FAIR GAME is meant, without rights for self, possessions or position, and no Scientologist may be brought before a Committee of Evidence or punished for any action taken against a Suppressive Person or Group during the period that person or group is 'fair game'.

A revision of December 23 1965, changed it to read, "By- FAIR GAME is meant, may not be further protected by the codes and disciplines of Scientology or the rights of a Scientologist."

As to what was a "suppressive person," Hubbard gave the definition:

A SUPPRESSIVE PERSON or GROUP is one that actively seeks to suppress or damage Scientology or a Scientologist by Suppressive Acts.

SUPPRESSIVE ACTS are acts calculated to impede or destroy Scientology or a Scientologist and which are listed at length in this policy letter. (Caps in original.
Some of the suppressive acts listed included "public disavowal of Scientology;

public statements against Scientology;" asking for a refund of fees paid; and "writing anti-Scientology letters to the press." Even turning a Scientologist into the proper authorities can gain one the label of suppressive. The issue also prohibits "1st degree murder, arson, disintegration of persons or belongings not guilty of suppressive acts." (Emphasis added.) In other words, killing suppressive persons or destroying their property promotes Scientology and is therefore ethical within the Scientology belief system.

WHY SCIENTOLOGISTS CANNOT GIVE
UNBIASED TESTIMONY

The material just quoted also shows why Scientologists cannot give unbiased testimony. If the testimony is viewed as critical of Scientology or a Scientology executive, it would be a "public disavowal" and a "public statement against Scientology" and would be a suppressive act. The person could then be kicked out of Scientology and be made Fair Game and sued. Since Scientologists don't want this to happen to them, they will not make any critical remarks or remarks that may be deemed critical. This is why Scientology officials have insisted that only active Scientologists can be experts" - because they will be biased to Scientology rather than responding fully and honestly to the Court.

AN EXAMPLE OF HUBBARD
IMPLEMENTING FAIR GAME

Scientologists like to find instances where Hubbard applied a doctrine so they can imitate it. Hubbard gave an example of how Fair Game should be applied shortly after he created the doctrine. Hubbard gave specific orders on how to apply the Fair Game doctrine in HCO Executive letter 27 September 1965 or. "Amprinistics " (attached as Exhibit E) This was what he called a "splinter" group, a group that was using Scientology "technical" methods without his control. Hubbard's three-page issue blasts the Amprinistics leaders with a variety of sexual charges (one of his favorite topics for accusations) and says what should be done:

"They are each fair game, can be sued or harassed. Horner can be barred out of any Commonwealth Country or England as he

was the subject of a deportation order from England and his file has come alive again in the Home Secretary's Office. Harry Thompson's wives and victims are always looking for him to have him arrested. Watson is a set-up for arrest as a homosexual. Any meeting held by them should be torn up. The names of any persons attending should be collected and they should be labeled SP [suppressive person] as they have left Scientology. These people are SP because they are seeking to avoid auditing and retain their withholds. Once labeled, these persons will not then be covered by amnesty and will never be admitted to further training and processing. Persons messing themselves up with Amprinistic [techniques] should be refused any assistance. If these persons move into your area act through any agency you can to have them deported or arrested on whatever grounds. England is currently too hot for them so they may tour about. Horner's UK deportation order, Thompson's police record and Watson's homosexuality make them very vulnerable to deportation or arrest.

Hubbard does not stop there. He goes on to issue a five-step order that include

"(2) Harass these persons in any possible way....

"(4) Tear up any meeting held and get the names of those attending and issue SP orders on them and you'll have lost a lot of rats.

This order is has never been canceled and is still "scripture" as an example how to attack "enemies." In fact, as an example of how Fair Game was being implemented against another defendant, attached as Exhibit F is a declaration from former member David Mayo who describes how he was held captive for six months and was told he would "never leave the property alive." (See pages 4-8) He describes the duress and threats as he became the target of the Fair Game Doctrine (or "Fair Game Law.")

HOW SCIENTOLOGY USES INVESTIGATION AND THE MEDIA TO ATTACK AND HARASS CRITICS

In 1966, Hubbard began to codify those sections of Scientology that would implement Fair Game. For example, on February 17, 1966, he created the Public Investigation Section with a policy letter of that name and date. (Attached as Exhibit G) He said it would serve "the useful functions of a intelligence and propaganda agency. It finds the data and sees that it gets action." The statistic of the unit included "the number of derogatory news stories appearing that week related to enemies of Scientology."

Hubbard also urged the priority of finding evidence of "murder, assault, destruction, violence, sex and dishonesty, in that order. Investigations which can uncover these factors in the activities of individual

or a group attacking Scientology are valuable in the degree that they contain a number of these factors." And note that Hubbard's use of such evidence is not for law enforcement but to the media. "In that way," he wrote, "we then Get rid of suppressive groups by investigation and disclosure." (Emphasis added.)

The next day, on February 18, 1966, Hubbard wrote "Attacks on Scientology" (Attached as Exhibit H) in which he again urged the use of investigations. Suppressives, he said, have by definition committed criminal acts. "These people who attack have secrets. And hidden crimes. They are afraid." He thus urged they be investigated as this, he said, would cause the attacker to withdraw.

A week later, on February 25, 1966, he wrote another "Attacks on Scientology" policy letter (Attached as Exhibit I) in which he urged, to "Start feeding lurid, blood sex crime actual evidence on the attackers to the press.

See also Hubbard's "How To Do a Noisy Investigation" of 5 September 1966 (Attached as Exhibit J). The target is "attackers of Scientology".

FAIR (GAME DOCTRINE
SPECIFICALLY INCLUDES
THE FILING OF LAW SUITS

On October 18, 1967, he issued "Penalties for Lower Conditions" (Attached as Exhibit K) whereby Fair Game was automatically issued on anyone (including staff members) who was an "enemy." Such people were, he said, "Fair game. They may be deprived of property or injured by any MEANS by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." (Emphasis added.)

CANCELLATION OF FAIR GAME ONLY MEANT
NOT USING THE WORDS ANY MORE BECAUSE
IT CAUSED "BAD PUBLIC RELATIONS"

In the late 1960s, Hubbard was having growing public relations problems. One problem was Fair Game. To deal with it, Hubbard wrote an issue that is often cited by CSI as evidence that Fair Game was canceled. But a careful reading will show that nothing has changed but semantics. The issue is "Cancellation of Fair Game" dated 21 October 1968. (Attached as Exhibit L) The entire text of the policy letter (P/L) is as follows:

"The practice of declaring people FAIR GAME will cease. FAIR GAME may not appear on any Ethics Order. It causes bad Public relations. [Emphasis added.] This P/L [policy letter] does not cancel any policy on the treatment or handling of an SP. [suppressive person]
L. Ron Hubbard Founder

THUS THE SO-CALLED "CANCELLATION"
OF FAIR GAME DID NOT CANCEL
THE USE OF FAIR GAME TACTICS

The original directive that CSI uses to say the Fair Game Doctrine was canceled expressly establishes that the only change was to stop using

the words "Fair Game.". Hubbard was quite clear that tactics were not to change. only the use of the words in public. As further evidence of Fair Game continuing, Hubbard later wrote "Confidential: Targets, Defense" on February 16, 1969, (Attached as Exhibit M) in which he listed "vital targets on which we must invest most of our time..." The first and most important: "T1. Depopularizing the enemy to a point of total obliteration."

MILITARY TACTICS ARE TO BE
USED IN FAIR GAME

On the same day, February 16, 1969, he wrote "Confidential: Battle Tactics" (Attached as Exhibit N) where he urged the use of military tactics and strategy in dealing with the "enemy." He wrote,

"A good general expends the maximum of enemy troops and the minimum of his own. He makes the war costly to the enemy, not to himself. One cuts off enemy communications, funds, connections. He deprives the enemy of political advantages, connections and power. He takes over enemy territory. He raids and harasses. All on a thought plane--press, public opinion, governments, etc. (Emphasis added.)

FAIR GAME TACTICS
EXPLAIN THIS LAWSUIT

When the Fair Game Doctrine and Scientology's "Final Solution" attitude towards "psychs" (psychologists and psychiatrists) are understood, this lawsuit can be understood. It will also be seen that what was at issue was not the deposition of the "celebrities" but those of the executives who were in non-compliance with this Court's Order. The reason was simple: they are the ones who directed this entire campaign.

HOW SCIENTOLOGY ATTORNEYS ARE USED
TO CLAIM "ATTORNEY WORK PRODUCT"

Surveillance is one of the standard tactics used by Scientology and CMA. It is often done by staff from the Office of Special Affairs ("OSA"). Tougher or more important assignments are given to private investigators who are paid by attorneys so the investigation can be called "attorney work product." This practice was because the 1977 FBI raid shattered Scientology's intelligence network.

The court should note that it has been told that such practices were done by a previous Scientology administration that has been eradicated. This is not true. I am attaching the billings of a private investigator who was doing surveillance on author Omar Garrison and apostate Gerry Armstrong in 1982. (Attached as Exhibit O) These were billed to attorney John Peterson. ("Peterson") However this investigation was being directed by David Miscavige ("Miscavige") who at the time (mid-1982) was my senior in an organization called Author Services, Inc. ("ASI") ASI was a for-profit group that was purportedly a literary agency handling Hubbard's books. We did handle Hubbard's works but our real function was to serve as Hubbard's personal arm into the non-profit Church of Scientology. This investigation by Tin Goose of Omar Garrison and Gerry Armstrong was paid for by Church of Scientology funds on Miscavige's orders while Tin Goose

reported directly to Miscavige. Peterson was merely the "cutout," to make it appear that it was attorney work product and to keep it away from ASI.

HOW MISCAVIGE USED A "DOUBLE-BLIND" TO GO AFTER AN ATTORNEY

In 1982 a "double-blind" system was initiated by Miscavige when he was directing the campaign against Boston attorney Michael Flynn. ("Flynn") Flynn had been representing plaintiffs in suit against Scientology and Hubbard, and Miscavige was demanding that Flynn be destroyed. (This is the Fair Game Doctrine although the words were never used, per Hubbard's orders.) Peterson was told to hire another attorney who had no connection or any knowledge of Scientology. That fresh attorney was to hire the private investigators to undertake certain harassing actions on Flynn. The purpose of the double-blind was if the investigator was caught and traced to an attorney, it would not be one hired by a Scientology group and any illegalities could be protected twice as attorney work product.

With the formation of the firm of Bowles and Moxon (attorneys for plaintiff in this case), investigations were moved to them rather than attorneys like Peterson because Bowles & Moxon are Scientologists and can be manipulated and threatened. Peterson was not a Scientologist and could not be so controlled.

EXPERTS AND COUNSEL ON THIS CASE WERE KEPT UNDER SURVEILLANCE

The court was advised of the investigation of counsel Graham Berry and ordered that it be stopped. (It was not because CSI cannot stop. Such investigations are required by Hubbard's "scriptures.") A similar investigation and surveillance was done of other experts on this case including myself and my wife. This went on for months. We have been tailed on the freeways, in shopping malls and even while a hundred miles from home on a day off. (In one instance, a tail I accosted confessed that he was tailing me and that he was Scientology staff.) Our trash has also been pilfered and former employers and associates interviewed. All of this is in keeping with the Fair Game Doctrine, hoping that they will find something to intimidate the person with. (If that doesn't happen, then something is concocted. They are now doing that with me, asserting that I assaulted a Scientologist in the city of Hemet. Their insistence that I be charged is being led - appropriately enough - by one of their key public relations people, Ken Hoden, who gets his orders from David Miscavige ("Miscavige") who is the head of the Scientology empire. At this writing, nothing has come of their baseless allegations.)

EXAMPLE OF TARGETING A PERSON IN LITIGATION WITH SCIENTOLOGY

Attached as Exhibit P is a Scientology program ("Julie's Background") designed to deal with a court problem in 1979. Julie Christofferson. She had sued the church and this program was written to

document that the people involved in the Christofferson case are criminals with criminal backgrounds and criminal records and that they engage in a criminal conspiracy to defraud the organization under the guise of "home and mother." Julie appears to be pure as the driven snow, so considerable background data [Scientology's euphemism for covertly obtained data] on her is needed to give us direction in

locating the real facts of interest about her.

Those "real facts of interest" are stated in the next paragraph as to what Scientology wants on the plaintiff.

The criminal background, drug history, record of arrests, former employment, perversions of Julie, fully known and documented, as

needed.

The program then goes on for pages to tell how to do this. There is nothing to indicate there is anything to find, merely the Hubbard-driven assumption that anyone who sues Scientology or attacks Scientology must by definition be a criminal. The program was written on Hubbard's direction.

CSI'S REFUSAL TO COMPLY IS BECAUSE OF
CSI'S COMPLETE DISDAIN FOR ANY SYSTEM
OTHER THAN HUBBARD'S

(CSI's general non-compliance with the orders of this Court was because of the disdain that Hubbard and the current leadership have for this and any court as well as the law. Time and again Hubbard wrote how his system of "justice" was superior to any system. Additionally Hubbard and Scientology were constantly being challenged by the courts. In Hubbard's view, neither he nor Scientology should have to answer to anyone. ACCORDING TO THE

SCIENTOLOGY
BELIEF SYSTEM. THE COURTS
ARE PART OF A CRIMINAL PLAN
DIRECTED BY "THE PSYCHS"

Another reason Hubbard and Scientology hold the courts in such disdain is Hubbard's view that the purpose of the justice system is to support psychologists and psychiatrists. This is done by "psychs" creating criminals who keep the courts alive who feed them back as a self-perpetuating system, funded entirely by the government. Hubbard wants to have the criminals fed to Scientology and to replace the legal system of justice with Hubbard's system, thus collecting the money that he felt is going to the psychiatrists and psychologists. (See attached as Exhibit Q "The Criminal Mind and The Psychs," attached as Exhibit R "The Cause of Crime," attached as Exhibit S "Criminals and Psychiatry," and attached as Exhibit C "Pain and Sex.")

THE ORDERED DEPOSITIONS
SHOULD HAVE PROCEEDED

The Court ordered David Miscavige, Norman Starkey, Mark Yager, Ray Mitoff, Lyman Spurlock, Marty Rathbun, Greg Wilhere and Jonathan Epstein to deposition. Most have, in turn, filed declarations to explain why they know nothing that is germane to this case. To the contrary, these are the executives who know more about this case than any other people.

Despite Miscavige's protests, he runs all of Scientology, regardless of corporate lines. In Scientology, there is only Scientology. Corporate lines are set up as ways to deflect the courts, the IRS and the authorities. When it comes to everyday work, Miscavige is appraised of every part of Scientology, from the church to the secular. He also issues orders to all sectors and approves all major transactions. His role is as the head of Scientology is well known within Scientology. It is only when it comes to

matters such as this suit that he and his lieutenants must suddenly conjure up the corporate lines and claim ignorance.

MISCAVIGE KNEW OF FISHMAN AND
CROSSED CORPORATE LINES TO
DEAL WITH FISHMAN'S MONEY

Additionally, Miscavige knows about Defendant Steve Fishman ("Fishman") and the amounts of money that Fishman contributed to Scientology. Miscavige had people removed from their positions because of the Fishman's money and now Miscavige claims he knows nothing. But Miscavige knows of the massive

amounts of money the Fishman had contributed. Miscavige gave a briefing at Golden Era Studios near Hemet, California, in 1987 to hundreds of staff (that included staff from non-CSI corporations) about Fishman's contribution of about \$80,000 for a library of "leather-bound" tapes. In that briefing, Miscavige screamed and cursed at the head of Golden Era Studios (Wendall Reynolds) because there were no such tapes to be sold. Miscavige (who is Chairman of the Board of the Religious Technology Center, a non-CSI entity) removed Reynolds from his position on the spot and assigned Reynolds to the gulag known as the Rehabilitation Project Force where he worked at hard labor for over two years. (I was sentenced to the same gulag for 14 months. Reynolds was there when I arrived.) Thus Miscavige not only knows of Fishman but has admitted it to hundreds of others. His claim he knows nothing is false testimony, as many can testify.

The others (Starkey, Yager, Mitoff et al) are Miscavige's immediate lieutenants who carry out his orders into their various sectors. They too know about the lack of corporate integrity and any role that Fishman played in Scientology. They also know about the various Hubbard directives I have quoted from. FISHMAN WAS BEING URGED TO INVEST IN "SPECIAL PROPERTIES," WHICH IS NOTHING BUT A FINANCIAL SCAM

The idea of "leather-bound tapes" is part of a line of "special properties" that was created by Miscavige in 1982 when he was Chairman of the Board at Author Services, Inc. ("ASI") I joined ASI in February, 1982, and left it in 1989. One of ASI's functions was to make millions of dollars for Hubbard. One way was by investments of Hubbard's fortune, which Miscavige directed, even though Miscavige had no investment background. Miscavige poured millions of dollars into oil speculation and lost it without telling Hubbard. (At one point the estimate was that Miscavige had lost about \$50 million of Hubbard's.) "Special Properties" was Miscavige's idea on how to recoup the millions before Hubbard (and the IRS) found out. The idea was to create "leather-bound special editions" and other items that could be sold at outrageous prices as an "investment". Those who bought books at thousands or even tens of thousands of dollars were then told a few months later how their "investment" had increased. Meanwhile, on the open market, the books were worth perhaps a hundred dollars, which was why Miscavige prohibited the open sale of these "Special Properties." (ASI now denies that there ever was a line of properties for investment.) This was how Fishman came to spend an astounding \$80,000 for a set of "leather-bound" tapes, which didn't even exist, and why Miscavige knew.

CSI HAS MISREPRESENTED ITS ROLE
IN RELATION TO THE "CELEBRITIES"

CSI's claim that it didn't want to put its "celebrities" through a

hardship is patently ridiculous. In my 20+ years in Scientology (which included working with many of them), I never once heard anything like this. To the contrary, it was just the reverse: "celebrities" would complain how they were being used, how they were being ordered to promote Scientology and being made to make media appearances when there was a legal problem or a problem in the media. The fact that these "celebrities" did not appear for their ordered depositions shows the control that CSI has over them. Now CSI turns it upside down again, claiming their welfare is why they want to drop a three-year old suit that has cost millions of dollars.

THE DEPOSITIONS OF THE "CELEBRITIES"
DID NOT INVOLVE CONFIDENTIAL MATERIAL

CSI has made it a point that several "celebrities" will be exposed to "confidential" material if forced into deposition. I know what material CSI was referring to and those materials had nothing to do with the ordered depositions. The "confidential" material is what is called "upper level" material in Scientology. This material is reserved for certain steps in Scientology "counseling," and had nothing to do with the ordered depositions of "celebrities," none of whom are even familiar with them.

At no time has attorneys for Dr. Geertz asked me for any assistance in handling this material, as to what it might mean, how they might ask questions about it, how they might use it or how the material might be presented to a person in any deposition, let alone indicate in any way that they intend to use those materials with those "celebrities." Nor are attorneys for Dr. Geertz capable of doing this without expert help for the material in question is highly arcane, complex and bizarre and will make absolutely no sense to anyone outside of Scientology. Thus the idea that attorneys for Defendants will somehow expose these "celebrities" to this "upper level" material is merely a sham and an excuse. What was feared was that the other depositions would occur, namely that of Miscavige, Starkey, Yager, etc.

CSI's attempt to use their own refusal to comply with the court as the reason for dismissal is a classical Scientology through-the-looking-glass strategy.

DENIAL OF LEGAL LIABILITY
WAS A TACTIC TAKEN ORIGINAL WITH HUBBARD

It was a long a well-known fact to Scientology executives that Hubbard ran Scientology, even though he had made public claims he was not. That was why there were programs to make it appear that Hubbard had no legal connection to the church. That tactic is what is now being used for Miscavige who has taken over Hubbard's position at the top of Scientology, even though Miscavige runs it just as Hubbard did. (See Exhibit T for "Operation Bulldozer Leak", a program designed to create that impression.)
CSI HAS NOT REFUTED YOUNG'S
STANDING AS AN EXPERT

In the declarations filed to claim discovery is complete, CSI has tried to refute my standing as an expert, even going to far as to twist the facts. For example, Miscavige tries to refute my claim that I arrived on the scene of Hubbard's before the authorities by saying that I arrived with some gardeners and cooks. This is not only not true but ridiculous since I arrived in the same entourage as Miscavige himself, two private investigators and attorney Earl Cooley who handled the disposition of Hubbard's body. Miscavige knows that I was a top Hubbard aide who was privy to considerable material and so do many others. He (Miscavige) can no more