

tell the truth about my role than he can about his, that he runs all of Scientology. I stand by my declarations and the documents supplied with them and am confident that the Court can winnow the wheat from the chaff.

HUBBARD'S DEATH CREATED A POWER STRUGGLE THAT MISCAVIGE WON

Hubbard died in hiding in January, 1986. He had been in hiding for several years. Even though we were in weekly written communication with him at Author Services, Inc., it was our task to pretend we were not, to keep the authorities from knowing how to reach him. During this time, Hubbard's closest confidant was Pat Broeker who was living with him as his aide. When Hubbard died, a power struggle erupted between Broeker and Miscavige as to who would run Scientology. Miscavige won. Those on Broeker's side were purged. That included me. I was sent to a desert gulag for 14 months. Broeker's wife Annie gave in and arrived while I was there. She later escaped once and was captured and returned and kept under 24-hour guard. Pat disappeared and no one has heard of him since. It is not known if he is alive.

HUBBARD'S AND OTHER MYSTERIOUS DEATHS IN SCIENTOLOGY

When it comes to the issue of deaths in Scientology, there are some important ones to use as a measure, starting with that of its founder, Hubbard, who died in January, 1986. I arrived at his secret ranch near San Luis Obispo, California, within hours of his death, well before the authorities. I went with Miscavige, attorney Earl Cooley, two private investigators and a few other key, selected staff. It was our collective task take command of the situation. The greatest fear was that there would be a panic in the Church of Scientology if the circumstances of Hubbard's death were known. For example, while Hubbard's condition deteriorated in the final weeks, his personal physician (Dr. Gene Denk) was sent to Reno to gamble, leaving Hubbard with no medical attention. Or that Hubbard's primary source of Scientology help was a person who had taken LSD over 1000 times. Or that the story that Hubbard decided to "leave the body" (Scientology's way of saying "died") was dreamt up at the next morning to calm Scientologists. Or that the body was quickly disposed of to avoid any autopsy that would reveal "medicines" that he had been taking. Thus the actual truth of Hubbard's death has yet to be told.

Hubbard's son Quentin also died under mysterious circumstances in 1976. He had disappeared from his home in Clearwater, Florida, and was found unconscious in a car next to the Las Vegas airport.

(Coroner's report

is attached as Exhibit U. He died unidentified, as a "John Doe.")

The engine

of the car was on and a hose ran from the exhaust pipe (although it appeared to have fallen off when the authorities arrived) to the window, making it appear to be a suicide. But, like his father's death, there were a number of nagging questions. For example, Quentin was found unkempt with a beard stubble, a state that no one who knew Quentin could accept. (He was ultra-meticulous in his appearance.) Or that the license plate of the car was missing and found under a rock some distance away. Or that his wallet was gone, making identification impossible. Or that a near-empty bottle of liquor was found, as if he had been drinking, when Quentin did not. Or that there were needle marks on his arms, when he did not use drugs.

Another mysterious but key death was that of Flo Barnett,

Miscavige's mother-in-law. She died in 1985 of three shots to the chest and one to the temple from a semi-automatic rifle. Two suicide notes were found. Although she was only 5'3" tall (and weighed only 114 pounds), the examiner determined she shot herself three times in the chest (with a rifle) before shooting herself through the head. (See coroner's report attached as Exhibit V.) What the authorities didn't know was that she had left Scientology and was associating with apostates, to the anger of her son-in-law Miscavige.

Defendant Uwe Geertz was prepared to present information about other mysterious deaths, murders and suicides of Scientologists and former Scientologists.

CSI DID NOT COMPLY WITH DISCOVERY

One unfamiliar with Scientology systems might think there would be no other information to be provided but as a 20-year veteran and one intimately familiar with the unchanging system, I can attest there is considerable information that was not provided although requested by Dr. Geertz.

CSI has repeatedly protested how many documents and people it made available to Dr. Geertz. Being intimately familiar with Scientology files and data-gathering procedures, I can say that CSI has not turned over large volumes of requested material and personnel to Dr. Geertz that are germane to this case. For example, there are extensive files (including computerized) that would enable a person to determine the effect of adverse press. These are kept and maintained on weekly basis. I personally know of them for I have worked with and have seen these files. They have been kept by Scientology for decades. These were not provided to Dr. Geertz. Nor were other material that would have been collected on Dr. Geertz, such as reports from private investigators, credit checks, all standard actions in Scientology proceedings. Nor has CSI supplied material regarding their investigation of Fishman's role in Scientology even though CSI's corporate secretary Lynn Farny said he had seen and reviewed such material.

Nor has CSI supplied those personnel that would know most about the truth or falsity of the facts in question in the Time magazine article. Those people are Miscavige, Yager, Willhere and Mitoff, Epstein, Spurlock and Starkey would know about Fishman's financial roles and Scientology financial scams.)

IT IS ROUTINE TO ALTER SCIENTOLOGY

RECORDS AND FILES TO AVOID THE AUTHORITIES

As early as 1971, I was introduced to the practice of altering Scientology records and files to thwart the authorities. This occurred when I worked as the Temporary Assistant Guardian in San Francisco. Under me was the Intelligence Bureau which was where Scientology was running its spies and agents. One day I received an order from the Guardian's Office United States (in Los Angeles) and was told to do a "clean-up" on any reference to Marsha Williams because she was going to become staff of the Intelligence Bureau in Los Angeles and possibly become an agent. What a "clean-up" meant was that I was to find and remove any reference to her anywhere in the San Francisco organization, where she had served, so there would be no record of her in the organization. This was to thwart any investigation of her or any trace on her by any authorities. I removed her name from various records and files and sent the material to Los Angeles. I later saw her in Los Angeles, as Intelligence staff, when I joined the US

Guardian's Office.

After the Federal Bureau of Investigation ("FBI") raided three Church of Scientology locations in 1977 to obtain documentation regarding violations of the law, I worked with scores of other people to quickly destroy any further evidence to keep it from falling into the hands of the authorities. We were all verbally briefed how we had to go through files and look for (1) any documents showing illegal activity and (2) any documents to show that Hubbard was running Scientology (which he was but we were trying to tell the authorities that he wasn't) and to destroy these documents. In this campaign, the amount of documents that were destroyed were in cardboard boxes stacked down halls. I do not know the page count but the stack was about four feet wide, four feet high and about 60 feet long. And this was from the location with the least amount of files. And there was no doubt that we were doing this to destroy incriminating evidence. In fact, several of us questioned this and were told to shut up and keep shredding paper.

Circa 1983 when I worked at Hubbard's "literary agency" Author Services, Inc., we were told there was a threat of an IRS raid on us and we had to move documents. These went to another floor in the building where we kept watch on them. There were about 50 bankers boxes of files that we were keeping hidden from the authorities who were also serving subpoenas to get records. Our task was to keep these other records secret. The files were kept on that other floor for a couple of months.

This last instance is cited in particular to anticipate the reply of CSI that the earlier examples were from an earlier regime that has been overthrown. This is not true. In fact, the 1983 instance at ASI was conducted by Miscavige who currently runs all of Scientology.

Thus the cleaning up of files to remove embarrassing or incriminating material was routine and the non-appearance of Fishman's name in certain groups is not indicative that he was not there.

CONTRARY TO THEIR DECLARATIONS,
CSI IS STILL USING THE ORIGINAL
GUARDIAN OFFICE STAFF

On a number of occasions, CSI has tried to disassociate itself from the Guardian's Office that was raided by the FBI in 1977 and the Guardian Office staff that went to jail, including Hubbard's wife, Mary Sue. It has been CSI's contention that those associated with the crimes were purged. This is not true.

The precise target of the FBI raid was the Snow White Program in the Intelligence Bureau of the Guardian's Office. In 1989 the Snow White Program was still active and one of its key staff was Grace Marie Haddy. (See "Non-Existence Formula" dated 12/16/89 from Snow White Pgms Chief OSA US attached as Exhibit W) Grace Marie Haddy was a key executive of the intelligence bureau and was privy to all communications detailing the illegalities that subsequently sent the 11 executives to jail.

Handling CSI's case before this court is Kendrick Moxon ("Moxon") who was named as an unindicted co-conspirator when Mary Sue and the others were indicted. Moxon was head of the Guardian Office Legal Bureau in Washington, D.C. (See the "Stipulation of Evidence" attached to the declaration of Vicki Aznaran, also filed 3/9/94 which includes a description of Moxon's role in obstructing the investigation of the Department of

Justice.)

THIS CASE DOES NOT CONCERN
PLAINTIFF CSI

With over 20 years as a staff member in various Scientology entities, both inside the Church of Scientology and in secular Scientology groups, I can say with confidence that after reading the article in Time magazine and the section for which Fishman and Dr. Geertz are being sued, I did not think of CSI. Although I was well aware that CSI existed, it would have been one of the last entities that would have come to mind. The article and the sections in question are about Scientology as a subject and practice, including the secular side of Scientology. (The secular side of Scientology is a multi-million dollar activity that has been kept hidden from the court. This side promotes that Hubbard's writings - the same ones used in this case as scriptures" are non-religious and "secular" and can be used in commercial enterprises to help the business or a client. This is the Jekyll & Hyde syndrome of Scientology, how they pretend to be a religion or a business, according to the potential customer or situation.)

CSI'S CASE DOES NOT HAVE MERIT
FOR SEVERAL COGENT REASONS

Besides the fact that the Time article is not about CSI, there are additional reasons why CSI's case has no merit. Some of these have already been covered. (1) CSI refused to comply with discovery. (2) CSI never intended to complete discovery because the suit was brought solely for malicious reasons (to punish a member of a group Scientology has promised to destroy, according to the Fair Game Doctrine.) (3) CSI is not the true plaintiff. Being familiar with the ecclesiastical and corporate structures of Scientology, I know by reading the passages at issue that Dr. Geertz was not speaking of Plaintiff Church of Scientology International ("CSI"). However that is one of the roles that CSI has, to intervene, because it has the manpower to wage lawsuits and to carry out the Fair Game Doctrine via the Office of Special Affairs. (4) There is a likelihood that what Dr. Geertz said is true, that Fishman was told to "end cycle" and to kill Dr. Geertz. CSI's refusal to provide information and deponents has prevented an adequate defense. But based on my 20 years in Scientology and seeing the level of criminality that was able to permeate the organization - always kept from the view of all but a select few - I cannot discount his allegations. (5) Even if Defendants statements are false, CSI was not hurt. By their own mission. CSI has no members that can be wronged. Additionally by Scientology's own writings, no press ever hurts them, especially anything in Time magazine. To the contrary, they have claimed that they grow in the face of such adverse publicity. Thus CSI must either admit that they were not harmed or admit that their Hubbard's claims of Scientology's infallibility are false.

The simple truth of this case boils down to this: the suit was brought under the "anti-psych" Fair Game doctrine by an entity without members and without standing (CSI) because it has an anti-"psych" arm whose function is to take over the field of mental health and destroy Hubbard's enemies. I know because I worked at that echelon for nearly 20 years and know it and the tactics intimately.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed in Los Angeles,

California, this 9th day

Robert Vaughn Young

of March, 1994.

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APPENDIX 3 CRITERIA FOR DETERMINING IF A GROUP IS A DANGEROUS
AND DESTRUCTIVE CULT

Q1.) Anybody can unfairly accuse or attack an organization or
group they disagree with or dislike by calling it a cult or
saying that they are using coercive mind control or coercive
psychological systems as you call it. How does F.A.C.T.
determine these things fairly and prevent this type of problem?

A1.) F.A.C.T. uses specific criteria to determine if a coercive
psychological system has been used. It does not imply
organizations or individuals are using coercive psychological

systems or are destructive or dangerous cults without careful research and determination that the evidence fits definite criteria. These criteria are threefold: The first set of criteria comes from the description of "Tactics of Psychological Coercion" in Appendix 1. The second set of criteria have to do with defining common elements of destructive and dangerous cults. The following section will help clarify what some of those specific elements and criteria are.

Common Properties of Potentially Destructive and Dangerous Cults

The cult is authoritarian in its power structure.

The leader is regarded as the supreme authority. He or she may delegate certain power to a few subordinates for the purpose of seeing that members adhere to the leader's wishes and roles. There is no appeal outside of his or her system to greater systems of justice. For example, if a school teacher feels unjustly treated by a principal, appeals can be made. In a cult, the leader claims to have the only and final ruling on all matters.

The cult's leaders tend to be charismatic, determined, and domineering.

They persuade followers to drop their families, jobs, careers, and friends to follow them. They (not the individual) then take over control of their followers' possessions, money, lives. The cult's leaders are self-appointed, messianic persons who claim to have a special mission in life. For example, the flying saucer cult leaders claim that people from outer space have commissioned them to lead people to special places to await a space ship.

The cult's leaders center the veneration of members upon themselves.

Priests, rabbis, ministers, democratic leaders, and leaders of genuinely altruistic movements keep the veneration of adherents focused on God, abstract principles, and group purposes. Cult leaders, in contrast, keep the focus of love, devotion, and allegiance on themselves.

The cult tends to be totalitarian in its control of the behavior of its members.

Cults are likely to dictate in great detail what members wear, eat, when and where they work, sleep, and bathe-as well as what to believe, think, and say. The cult tends to have a double set of ethics. Members are urged to be open and honest within the group, and confess all to the leaders. On the other hand, they are encouraged to deceive and manipulate outsiders or nonmembers. Established religions teach members to be honest and truthful to all, and to abide by one set of ethics.

The cult has basically only two purposes, recruiting new members and fund-raising.

Established religions and altruistic movements may also recruit and raise funds. However, their sole purpose is not to

grow larger; such groups have the goals to better the lives of their members and mankind in general. The cults may claim to make social contributions, but in actuality these remain mere claims, or gestures. Their focus is always dominated by recruiting new members and fund-raising.

The cult appears to be innovative and exclusive.

The leader claims to be breaking with tradition, offering something novel, and instituting the only viable system for change that will solve life's problems or the world's ills. While claiming this, the cult then surreptitiously uses systems of psychological coercion on its members to inhibit their ability to examine the actual validity of the claims of the leader and the cult.

The third set of criteria has to do with defining other common elements of coercive psychological systems. If most of Robert Jay Lifton's eight point model of thought reform is being used in a cultic organization, it is most likely a dangerous and destructive cult. These eight points are:

1. ENVIRONMENT CONTROL. Limitation of many/all forms of communication with those outside the group. Books, magazines, letters and visits with friends and family are taboo. "Come out and be separate!"
2. MYSTICAL MANIPULATION. The potential convert to the group becomes convinced of the higher purpose and special calling of the group through a profound encounter/experience, for example, through an alleged miracle or prophetic word of those in the group.
3. DEMAND FOR PURITY. An explicit goal of the group is to bring about some kind of change, whether it be on a global, social, or personal level. "Perfection is possible if one stays with the group and is committed."
4. CULT OF CONFESSION. The unhealthy practice of self disclosure to members in the group. Often in the context of a public gathering in the group, admitting past sins and imperfections, even doubts about the group and critical thoughts about the integrity of the leaders.
5. SACRED SCIENCE. The group's perspective is absolutely true and completely adequate to explain EVERYTHING. The doctrine is not subject to amendments or question. ABSOLUTE conformity to the doctrine is required.
6. LOADED LANGUAGE. A new vocabulary emerges within the context of the group. Group members "think" within the very abstract and narrow parameters of the group's doctrine. The terminology sufficiently stops members from thinking critically by reinforcing a "black and white" mentality. Loaded terms and clichés prejudice thinking.
7. DOCTRINE OVER PERSON. Pre-group experience and group experience are narrowly and decisively interpreted through the absolute doctrine, even when experience contradicts the doctrine.
8. DISPENSING OF EXISTENCE. Salvation is possible only in the group. Those who leave the group are doomed.

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US District Court, Central District of California
Fishman Case # 91-6426 HLH (Tx) Continued

Exhibit B

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141 N. W. 1st Avenue
Dania, Florida 33004

(0027)

Exhibit B

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ON CONTROL AND LYING

THE ONLY WAY YOU CAN CONTROL PEOPLE IS TO LIE TO THEM. You can write that down in your book in great big letters. The only way you can control anybody is to lie to them. When you find an individual is lying to you, you know that the individual is trying to control you. One way or another this individual is trying to control you. That is the mechanism of control. This individual is lying to you because he is trying to control you - because if they give you enough misinformation they will pull you down the tone scale so that they can control you. Conversely, if you see an impulse on the part of a human being to control you, you know very well that that human being is lying to you. Not "is going to", but "is" lying to you.

[last sentence is underlined in original]

Check these facts, you will find they are always true. That person who is trying to control you is lying to you. He's got to tell you lies in order to continue control, because the second you start telling anybody close to the truth, you start releasing him and he gets tougher and tougher to control. So, you cant control somebody without telling them a bunch of lies. You will find that vry often Command has this as its greatest weakness. It will try to control instead of leading. The next thing you know, it is lying to the [illegible]. Lie, lie, lie, and it gets worse and worse, and all of a sudden the thing blows up. Well, religion has done this. [Following sentence is underlined] Organised religion tries to control, so therefore must be lying. [end underline] After a while it figures out (even itself) that it is lying, and then it starts down tone scale further and further, and all of a sudden people get down along this spring-like bottom (heresy) and say, "Are we going into apathy and die, or are we going to revolt?" and they revolt, because you can only lie to people so long. Unfortunately there is always a new cycle of lying.

L. Ron Hubbard
Technique 88

(0029)

Letter of Authenticity