

endless trillions of years of the past. Don't muff it now  
because it seems unpleasant or unsocial to do Seven, Eight,  
Nine, and Ten."1 Do them and we'll win "

Without the various hypnotic and trance inducing initiatory levels intertwined into Scientology's cosmological cloak, Scientology's substantive and actual secret activities and motivations would become visible, long before the covert application of their coercive persuasion programs have had the opportunity to undermine the judgment, clarity~ and reasoning of their lower level or "outer circle" new members.

"Psychiatrists say these sessions can produce a drug like mind controlled euphoria that keeps the customers coming back for more.

Scientology's secret inner cosmology also cloaks the ignoble intentions of Scientology's founder, L. Ron Hubbard, to possess wealth, power and make other people his political and economic "slaves." 4 The secret inner cosmology cloaks the actual mental state, qualities, and motivations of L. Ron Hubbard. Hubbard at various times has been described as megalomaniacal and a psychological liar.S

"We are not in the business of being good boys and girls. We're in the business of going free and getting the org production roaring. Nothing else is of any

-----1.r"7. Hammering out of existence incorrect technology, 8. knocking out incorrect applications, 9. closing the door on any possibility of incorrect technology, 10. closing the door on incorrect applications."] From Hubbard Communication Office Policy Letter "Keeping Scientology Working," the most repeatedly studied policy in Scientology. Besides new member indoctrination, points seven through ten find broad application and interpretation in Scientology's intelligence actions toward perceived mental health competitors or other adversaries.

2. For complete details regarding Scientology's auditing\coercive persuasion process see the "Coercive Persuasion and Scientology," appendix materials in Respondent's Supplemental Brief of November 16, 1991, U.S. 89-1361, Appendix 3.

3. Time magazine May 6, 1991.

4. From Time magazine May 6, 1991. "All men are your slaves," is a quotation from L Ron Hubbard's personal affirmations as disclosed in the Armstrong v. Scientology case.

5. See Church of Scientology of California v. Armstrong No. C.420153 Cal. Super. CT. (1984). Scientology settled out of court with Armstrong for approximately \$800,000.00 and then initiated sealing the court records.

interest then to Ethics but (a) getting tech in...and (b) getting production up and the org rolling along...In short a staff member can get away with murder so long as his statistic is up and can't sneeze without a chop if its down...Ethics must use all org discipline only in view of the production statistic of the staff member involved." (HCO policy letter of September 1, 1965 Issue VII.)

"The purpose of ethics is to remove counter intentions from the environment ." (HCO pol i cy letter of June 18, 1968.)

In Scientology the creation of a fanatical "will to triumph" is reminiscent of another ruthless inner circle. In spite of overwhelming factual evidence, the top leaders of the Nazis continued to refuse to believe the war was lost. Isolated mentally and physically, they even continued to issue battle plans and orders to nonexistent armies.

The allies literally had to fight the Nazi leaders to the near last Berlin bunker, but not before 50 million people first had to die. History has painfully taught us the result of secret conspiratorial fanaticism.

Coercive political secret societies cut off their members from any opposing facts or opinions. They subvert rational and logical thought. Unfortunately, when a society becomes dominated or strongly influenced by such extreme groups or ideologies, only the most extreme deterrents historically have had any correctional or deterrent effect.~

#### THE CRIMINAL GOALS OF SCIENTOLOGY

Scientology is, at its inner essence, an intelligence agency 2 and a political secret society.

"In my opinion the church has one of the most effective intelligence operations in the U.S. rivaling even that of the F.B.I." From Ted Gunderson a former head of the F.B.I's Los Angeles office.

-----1.This is not to suggest that the inner Scientology and the former Nazi party are identical or somehow linked. There are although many similarities in policies, tactics, and esoteric goals, more than enough to validate model parallels and comparison.

2.Scientology operates an intelligence division formerly called the G.O., now called the OSA. It is smaller in scope and similar in operation to the C.T.A., K.G.B., or Mossad. In the training manuals for Scientology's intelligence operations seized by the F.B.I., L. Ron Hubbard states that Scientology has the best intelligence service in existence today. For more detailed information on Scientology's intelligence agency, see "A Piece of Blue Sky" by John Atack, part 5, "The Guardian's Office." Also see the documents seized by the FBI concerning the G.O., its training manuals, and its covert operations manuals.

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For the liability shielding benefits of religious protection Scientology uses a veneer of extraterrestrial cosmology consisting in part of alien space wars and the creation of a new superman, the Homo Novis, the Clear, and the Operating Thetan, (OT).'

For the privileged inner initiates there is even a cleverly created secret adaptation of traditional and science fictionesque neo-satanism. 3 Scientology's cloaking cosmology helps to secure both undeserved first amendment religious immunities for its experimentation with thought reform and is part of an absolutely essential internal cover story to the newer outer circle members. It covers the organization's motivations behind its criminal and antisocial actions and policies, and its actual anti-religious, political power, wealth, and control goals.

"The vital targets on which we must invest most of our time are: (T1) Depopularizing the enemy to the point of obliteration. (T2) Taking over the control or allegiance of the heads or proprietors of all news media. (T3) Taking over the control or allegiance of key political figures. (T4) Taking over the control or allegiance of those who monitor international finance and shifting them to a ~~less~~ precarious standard"....

"Intelligence is not concentrating on what they should be - the WFMH, [World Federation of Mental Health] the NAMH [National Association of Mental Health] These are the groups I want destroyed." From the Hubbard Communications Office Policy Letter of 14 Jan. 1969, " Thus in the case of Scientology Orgs [organizations] one should attack with the end view of taking over the whole field of mental health."

"Our war has been forced to become, to take over absolutely the field of mental healing on the planet in all forms." "Our only justification in doing these things is that Scientology is the only game where everybody wins...."

In a way not altogether unlike the Nazi bullies who over-

----- 1. Time magazine May 6, 1991.

2.The preceding three Scientology terms refer to previously "unattainable" new evolutionary states in mankind, which only can be attained through Scientology.

3. See the "Another Secret Scientology Section or the Respondent's Supplemental Brief of November 16, 1990 U.S. 89-1361 appendix 2, "The Secret Scientology," for restricted or sealed details on Scientology's secret cosmology.

4.The preceding quotation from "Targets", "Guardian Order 060971," and other documents seized by the F.B.I. on its authorized search of Scientology's headquarters.

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whelmed the German judicial system, Scientology's fanatical tactics threaten the critical balance necessary to protect our justice process.

The chapters will put more hard documentation behind these harsh statements.

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DAVID MISCAVIGE

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY  
INTERNATIONAL, a California Non-  
Profit Religious Organization,

vs .

Plaintiff,

STEVEN FISHMAN and UWE GEERTZ,

Defendants.

CASE NO. CV 91-6426 HLH(Tx)

DECLARATION OF DAVID MISCAVIGE

I, DAVID MISCAVIGE, declare and say:

1. I am over 18 years of age and a resident of the State of California. I have personal knowledge of the matters set forth in this declaration and, if called upon as a witness I could and would competently testify thereto.

2. I am not a party in the above-referenced case. nor am I affiliated in any corporate capacity with the plaintiff, Church of Scientology International ("CSI"). I make this declaration for several reasons. First, until January 4, 1994, the date on which I was informed that my deposition had been ordered in this case by Magistrate Judge Tassopoulos, I had no idea that I would be required to testify in this case. I was never served with any subpoena for such testimony, I have never had any contact whatsoever with either defendant,

and I had nothing whatsoever to do with this case until now. In fact, it was not until January 6, 1994, after my deposition had been ordered, that I first read the outrageous papers filed by Geertz's counsel when he sought to have my deposition ordered. Second, upon reading those papers, I discovered that Geertz's counsel made arguments to the Magistrate Judge that gave her the absolutely false impression that I was evading service of subpoena. It caused me great concern to learn that the Magistrate Judge had asked, "Why has Mr. Miscavige avoided service?" I did no such thing, and were it not for the baseless allegations which Geertz's counsel proffered, I believe the Magistrate Judge would instead have asked Geertz's counsel, "Has Mr. Miscavige been served?" The truthful answer to that question is "No." Third, my lawyers' efforts to arrange for my deposition to be taken have been rebuffed by Geertz's counsel, who, at the same time, is threatening to move for a contempt citation against me for not appearing at a deposition he has refused to schedule. It is inconceivable to me that Geertz's counsel can seriously contend that I am to blame for a deposition not going forward when he has refused to depose me. Finally, in the course of these proceedings, Geertz's Counsel, Robert Vaughn Young and Stacy Young have made a number of allegations about me and about the Scientology religion which require a response, so there can be no doubt that those allegations are false.

3. I have read the vile declarations filed by Vaughn and Stacy Young in this case. It is clear to me that the false allegations they have filed have been offered solely for the purpose of making me the centerpiece of this litigation, and that their motivation is to forward a litigation tactic of harassment to the point of a hoped-for default by the only plaintiff to this action, CSI. The foregoing is based on the falsity of the claims they have made, my personal knowledge that both of these individuals are not qualified to testify to the matters they have addressed by declaration, and because I have seen the same litigation tactics used before in instances where Vaughn Young would have learned this "technique." Therefore, this declaration is submitted to demonstrate that I have no knowledge of the defendants in this case, to set the record straight concerning the false allegations of Vaughn and Stacy Young, and to comply as fully with the court order concerning my deposition as Geertz's counsel's actions permit, since Geertz's counsel has declined all opportunities to do so. I also submit this declaration because I feel the Court has been poisoned into believing that I have had some role in this litigation by the statements of the Youngs and counsel for Geertz, to which I have neither responded nor even had the opportunity to respond.

#### BACKGROUND

4. I have been a practicing member of the Scientology religion since 1971. In 1976, I joined staff of the Church of Scientology of California (and the Sea Organization -- the Scientology religious order). During my tenure in this corporation, I held many positions. In 1977, I had the opportunity to work directly with L. Ron Hubbard in many

different capacities. In 1978, Mr. Hubbard was engaged in the production of Scientology films which had the purpose of training Scientology counselors (called "auditors") in the practice of Scientology. During this time I was the Chief Cameraman. Later, I worked directly with Mr. Hubbard as a member of the Commodore's Messenger Organization ("CMO"), which duties consisted of assisting Mr. Hubbard in whatever activities he was engaged in. The functions are best described as an assistant. Later, when Mr. Hubbard went into seclusion to continue his researches on Dianetics and Scientology, and to engage in his own writings, I became part of a newly formed CMO organization, CMO International.

5. CMO International's role was to see that the management of the Church operated in accordance with Scientology policy and technology. The title of my position was Action Chief. In short, this post was responsible for missionary activities of the Church, where personnel from the Mother Church would travel to different parts of the world to see to the proper operation of various Church activities and to take corrective action where necessary. The types of missions I generally supervised were those that saw to the correct functioning of the Church management and the correction thereof.

6. From the beginning of 1982 until March of 1987, I was Chief Executive Officer and later Chairman of the Board of Author Services, Inc. ("ASI"), a California corporation which managed the personal, business, and literary affairs of L. Ron Hubbard. Later in this declaration, I describe how I came to that position.

7. Since March of 1987, I have been Chairman of the Board of Religious Technology Center ("RTC"), a California non-profit religious corporation recognized as tax exempt under Section 501(c)(3) of the Internal Revenue Code. RTC is not part of Church management, nor is it involved in the daily affairs of various Church of Scientology organizations or missions. RTC ensures that the trademarks of Dianetics and Scientology, and the technology they represent, are properly used around the world. It exists to see that Dianetics and Scientology technology is safeguarded, is in good hands, and is properly used.

8. RTC was formed with the specific purpose of seeing that the religion of Scientology was kept pure and true to the source materials of the religion. In fact, a major reason for its formation was to have such a Church organization that performed these functions in a capacity entirely separate from the actual management of the various Churches and Missions of Scientology. Not only is RTC not involved in the management of the international hierarchy of Scientology churches, but its very existence and performance of its true functions depends on the fact that it is NOT part of Church management. The authority of the Religious Technology Center stems from the ownership of the trademarks of Dianetics and Scientology. In brief, RTC's maintenance of these trademarks is threefold:

A) ensuring that when something is represented as Dianetics or Scientology, that it actually is;



B) seeing that any organization representing itself as Dianetics or Scientology (and using those names), while actually being something entirely different, is prevented from doing so; and

C) seeing that anyone offering Scientology, but calling it something else (a name other than Dianetics or Scientology) is prevented from doing so.

I could give various such examples where actions listed in B) and C) have actually occurred, although it is not necessary here. Suffice it to say that when such has occurred, RTC has acted, with litigation when necessary, and has been able to uphold the proper use of the marks in every instance.

9. As Chairman of the Board, the most senior position in RTC, I am uniquely interested in the standard application of the Scripture of Scientology as detailed in Hubbard Communications Office Policy Letters (HCO PLs) and Hubbard Communications Office Bulletins (HCOBs) and the spoken words of Mr. Hubbard on the subjects of Dianetics and Scientology as recorded on audio tape, video, film and, in some cases, written transcriptions of these materials. I inspect and correct departures from the standard application of the Scripture of the religion. I also ensure that any attempted perversion of the technology of Dianetics and Scientology is rapidly dealt with, to keep the religion pure so that all people may benefit from the application of Mr. Hubbard's breakthroughs in the fields of the mind, the spirit and life.

10. In the course of my duties I travel widely. I often appear at Church events and briefings which serve to keep Scientologists around the world aware of the widespread application of Mr. Hubbard's writings. In all such appearances, my position as Chairman of the Board of RTC is known, as is its distinction from actual Church management officials of CSI. I also oversee the affairs of the Religious Technology Center in its function of verifying that the source writings of the religion are kept pure. This specifically includes the verification that the materials representing themselves as being Dianetics and Scientology are in fact that, and that they honestly reflect the source writings of the religion by L. Ron Hubbard. I also oversee RTC's function of assuring that the trademarks of Dianetics and Scientology are legally registered and kept current in over 190 countries around the world.

11. Neither RTC nor I has any corporate authority over any Scientology church, including CSI. CSI is the Mother Church of the Scientology religion and has been since its inception in 1981. As such, CSI is responsible for the activities commensurate with such a role, including the ecclesiastical management of Churches, dissemination and propagation of the faith and defense of its activities, including external and legal affairs. All of the foregoing facts were submitted to and thoroughly reviewed by the Internal Revenue Service prior to the recent recognition of the tax-exempt status of CSI, RTC and a host of other Church corporations and entities.

FAILURE TO SERVE SUBPOENA

12. Apparently Geertz's counsel made some attempts to serve me with a deposition subpoena in Los Angeles in December of 1993, when I was away from California on business in the United Kingdom and Washington, D.C. I keep a busy schedule that requires extensive travel in the course of handling a wide range of ecclesiastical duties, and my schedule has nothing to do with the presence or absence of process servers. In January, I was away on business in Clearwater, Florida and Washington, D.C. In Washington, I met with the head of Interpol, Raymond Kendall, on one of the days that Geertz's counsel unilaterally set for my deposition. This meeting had been arranged for more than a month and since this individual was traveling all the way from Interpol headquarters in Europe, it was hardly something I could cancel. During that same week, and on another day arbitrarily set for my deposition, I met with IRS officials in a similarly pre-arranged meeting. In fact, I was only home for approximately 25 days in all of 1993. I was simply not in the State of California during the entire time in which service attempts on me were apparently being made. I understand this fact was made known to the Magistrate Judge in this case and later to the Court. To this day, I have never received a subpoena in this case.

13. Any suggestion that I try to avoid giving testimony is just false. In May of 1992, I testified at a legal proceeding in Toronto, Canada, although there was no legal means to compel my testimony. I testified for four full days in the summer of 1993 in Church of Scientology International v. Eli Lilly. et al., a case pending in federal court in Washington, D.C. There are over 1100 pages of deposition transcript that comprise that deposition, with very little in the way of objections or colloquy. I did so because I knew my testimony was needed and relevant. In 1990, I was deposed for two full days in Bent Corydon v. Church of Scientology International. In that instance, I was "rewarded" for appearing by having plaintiff's counsel serve me with various subpoenas in other unrelated matters. In both Lilly and Corydon, the opposition first attempted to notice my deposition while concurrently advising that I would "refuse to appear." In each instance I was forced to refute such nonsense and in fact did appear. To claim that I evade service or avoid being deposed or otherwise avoid giving testimony is nonsense on its face.

14. I want the Court to be aware that upon learning that my deposition had been ordered by the Magistrate Judge on January 4, 1994 and upon reading the allegations that apparently led to that order, which I first read on January 6, 1994, I consulted with my counsel in this matter, who advised that I seek the Court's review of the Magistrate Judge's order concerning my deposition. At the same time, I also instructed my counsel that in spite of the fact that I had no knowledge of the issues raised in this case, and in spite of the lack of any service of a subpoena on me, and in spite of the fact, as noted above, I was to be out of town for much of January, counsel should try to make arrangements for my deposition to be taken, should the Court not reverse the Magistrate Judge's order. Efforts to make such