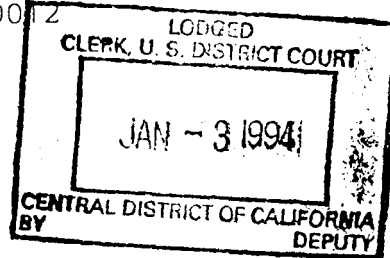


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7 UNITED STATES DISTRICT COURT:

8 CENTRAL DISTRICT OF CALIFORNIA
9

10 CHURCH OF SCIENTOLOGY) Case No. CV 91 6426 HLH (Tx)
11 INTERNATIONAL, a California)
12 non-profit religious) DECLARATION OF STACY YOUNG
organization,) DATED JANUARY 3, 1994, AND
13 Plaintiff,) FILED IN OPPOSITION TO
14 vs.) PLAINTIFF'S VARIOUS MOTIONS
15 STEVEN FISHMAN AND UWE GEERTZ,) FOR PROTECTIVE ORDERS AND IN
16 Defendants.) SUPPORT OF DEFENDANT GEERTZ'
Date: January 4, 1994
Courtroom: J
[Hon. Venetta S. Tassopoulos]

17 Trial Date: 2/8/94
18 Pre-Trial Conf.: 1/31/94
19 Motion Cut off: 1/24/94
Discovery Cut off: 12/31/93

20 [Filed Concurrently with
21 Declaration of Graham E.
Berry dated January 3, 1994

22 DECLARATION OF STACY YOUNG

23 I, Stacy Young, declare as follows:

24 1. I have been retained by Dr. Geertz's counsel, Graham
25 Berry, as an expert consultant in this litigation and have been
26 designated as one of Dr. Geertz's experts to testify at trial
27 herein. The statements herein are of my personal knowledge or
28

1 reasonably based on information and belief, and if called upon as
2 a witness, I can testify competently thereto.

3 2. This declaration is submitted in connection with
4 defendant Dr. Uwe Geertz's opposition to plaintiffs' motions for
5 protective order regarding the taking of certain depositions in
6 this litigation.

7 3. I was a member of the Church of Scientology for more than
8 14 years, from January 1975 until July 1989. From October 1975
9 until I left, I was a member of the Sea Organization, the most
10 dedicated group of Scientologists in the entire organization. I
11 spent most of my time from 1978 until 1989 in a highly
12 confidential section of Scientology management which was known as
13 the Guardian Office until 1982 and is today called the Office of
14 Special Affairs. This section of Scientology is responsible for
15 dealing with all external public relations, all matters relating
16 to civil litigation or criminal matters, all governmental
17 relations such as the IRS, and all critics of Scientology.

18 4. During my tenure in Scientology I acquired extensive
19 knowledge of the Scientology counseling methods known as auditing,
20 the methods of training staff members and public Scientologists,
21 the methods of dealing with non-Scientologists (known as "external
22 publics") and former Scientologists and/or critics, known as
23 enemies or suppressives, and the administrative and management
24 procedures of the organization.

25 5. My first experience with Scientology was at the Mission
26 of Atlanta, Georgia, where I attended a series of introductory
27 lectures about the mind. I received some basic auditing and took
28 several basic courses.

1 6. I joined the Sea Organization ("Sea Org," or "SO") at the
2 Advanced Organization in Los Angeles ("AOLA") in October 1975. To
3 become a Sea Org or SO member one must sign a billion-year
4 contract to confirm one's dedication to Scientology and "clearing
5 the planet" (see explanation below).

6 7. All staff members involved in delivering the confidential
7 upper levels of Scientology auditing and all staff members involved
8 in Scientology management must be members of the Sea Org. They
9 live communally and are under the absolute authority of the Sea
10 Org command lines 24 hours a day. I was paid \$24 per week - when I
11 was paid.

12 8. The Sea Org has total authority over all Scientology and
13 Scientology-related organizations, including all nonprofit and
14 for-profit corporations. It cuts across all corporate boundaries
15 and can take over any Scientology organization without notice. Any
16 Scientologist who refuses to submit to Sea Org authority is
17 declared a "suppressive person" and expelled from Scientology.

18 9. All Scientologists consider that Scientology is the only
19 way for Mankind to go free. For a Scientologist this means getting
20 "exterior" to the physical body ("exteriorization") and, indeed,
21 to the entire physical universe, returning to Man's "native state"
22 as a "static," which is "without mass, without wave-length,
23 without time, and actually without position." In fact, L. Ron
24 Hubbard created a new category of humanity for those who go
25 through all the levels of Scientology processing; they transcend
26 the state of Homo Sapiens and become what he called Homo Novis
27 (similar to Nietzsche's Superman). Scientologists expect that once
28 they have attained this state they will be free to travel

1 throughout the galaxies, freeing others who are in the trap of the
2 physical universe. What will happen after that is somewhat vague,
3 but no one has attained this state as yet anyway, so it doesn't
4 really matter.

5 10. The route out of the physical universe trap is called
6 "The Bridge to Total Freedom." Every Scientologist is at one stage
7 or another on this Bridge, and they are expected to get everyone
8 else on this Bridge as well. The idea is for everyone on Earth to
9 get exterior to the physical universe. The only people who aren't
10 included are "suppressives," meaning those who have been critical
11 of Scientology. Suppressives don't deserve to go free. Hubbard did
12 not consider that suppressives should be allowed to go free.

13 11. The Bridge is composed of a series of auditing processes,
14 an auditing process being a set of specific questions and
15 commands. The person who asks these questions and delivers these
16 commands is called the "auditor." The person who answers the
17 questions and carries out the commands is the "preclear," since
18 the first major milestone on the Bridge is called "going Clear."
19 After one attests to the state of Clear, one moves on to the
20 confidential upper levels of auditing known as the "Operating
21 Thetan" or "OT levels" ("thetan" being Hubbard's term for the
22 person without his or her body).

23 12. At the level of OT 3, one is allowed access to
24 handwritten notes by Hubbard which detail a terrible disaster that
25 happened in this sector of the universe 75 million years ago. The
26 head of the Galactic Federation, whose name was Xenu, solved a
27 massive overpopulation problem by rounding up billions upon
28 billions of people and transporting them in blocks of ice to

1 several volcanoes on Earth, which was known as Teegeeeack at the
2 time. They were dumped near the volcanoes and subjected to H-bomb
3 explosions. At the same time, they were subjected to a series of
4 images which were electronically driven, or "implanted," into their
5 minds. After the "implant" was completed, these disembodied beings
6 were transported to Hawaii and Las Palmas where they were packaged
7 up into "clusters." Attached hereto as exhibit "1" is a copy of
8 the OT 3 materials.

9 13. According to Hubbard, the OT3 implant is rigged to kill
10 anyone who finds out about it before they have received the lower
11 levels of Scientology processing. Needless to say, it is a major
12 revelation to discover that one is covered from head to foot with
13 these disembodied beings, called "body thetans" or "BTs" in
14 Scientology. One has literally millions, or even billions of these
15 BTs, and they have to be audited on very precise processes to get
16 them to wake up and disengage themselves (or "blow") from the
17 person's body. The idea is that once all of these BTs have been
18 gotten rid of, one will be able to exteriorize from the body at
19 will. These BTs can cause illness and even insanity if they become
20 upset, so it is important to get rid of them as quickly as
21 possible and to make sure one has done a very thorough job of it.

22 14. I was a staff member at the Advanced Organization of Los
23 Angeles ("AOLA") from October 1975 through December 1978. AOLA is
24 one of a handful of organizations around the world where people
25 can go to receive the confidential upper levels of Scientology
26 processing. I audited hundreds of hours on public preclears as
27 well as staff members to prepare them for their upper levels, or
28 OT levels. (When a person begins their OT levels they no longer

1 have an auditor. They graduate to what is called "solo auditing,"
2 a process in which they audit their own disembodied beings, called
3 body thetans or BTs.) I also did many security checks on staff
4 members. A security check is a method of inducing a person to
5 confess to his or her crimes, particularly crimes against
6 Scientology.

7 15. In 1977 I was posted as Interne Supervisor at AOLA. In
8 this capacity I supervised auditors-in-training, known as internes,
9 to certify them as qualified professional auditors. To perform
10 this function I had to understand auditing procedures precisely,
11 from the most basic processes to the advanced processes and
12 procedures of Class 6 and Class 8, which are advanced levels of
13 expertise, so that I could recognize whether or not the internes
14 were conducting themselves as proper auditors.

15 16. As a result of my experiences at AOLA I acquired a high
16 level of expertise as a "tech terminal," meaning one who is
17 knowledgeable about the technical application of Scientology
18 auditing and training methods.

19 17. at the end of 1977 I transferred to the United States
20 Guardian's Office ("USGO") in Los Angeles. I was a staff member in
21 the USGO from January 1978 through January 1982. The Guardian's
22 Office was the part of Scientology that handled Public Relations,
23 Intelligence and Legal matters for Scientology. 18. Because of
24 my technical background, I was posted as the Organizing Officer
25 ("Org Officer") for the Public Relations Bureau and, later, as the
26 Org Officer for the entire Guardian's Office. As the Org Officer my
27 functions included the handling of all personnel and
28 organizational matters, such as correcting a staff member who made

1 mistakes, taking care of staff members who were sick or upset or
2 in trouble, recruiting new people for staff, and promoting or
3 demoting staff members as needed. I was also responsible for the
4 establishment and proper administration of all the Guardian's
5 Office personnel throughout the United States. Because the
6 Guardian's Office oversaw certain aspects of the administration of
7 all other Scientology organizations, I became very familiar with
8 the overall structure of Scientology and how the various
9 organizations interact with each other and with the outside world.

10
11 19. In early 1982 I was assigned to a unit known as Special
12 Project as a Public Relations Assistant under my husband, Robert
13 Vaughn Young. In this position I became familiar with the L. Ron
14 Hubbard archives material, which was the complete collection of
15 all of Hubbard's personal papers, including diaries, letters, and
16 notes that he had kept from a very early age.

17 20. Several months later Special Project became what is now
18 Author Services, Inc, a for-profit company whose ostensible
19 purpose was to be L. Ron Hubbard's literary agency. I was taken
20 out of public relations and made the Organizing Officer for ASI in
21 April 1982. In this position I worked directly for David
22 Miscavige, who was Chairman of the Board of ASI ("COB ASI"), to
23 carry out his orders concerning the staff of ASI.

24 21. David Miscavige, known as DM, has been the head of
25 Scientology since 1981. His loyalty to L. Ron Hubbard and
26 Scientology is absolute, and he is utterly ruthless about
27 maintaining his power. He moved the seat of power from ASI to the
28 Religious Technology Center (RTC) in 1987, during a period of time

1 when the IRS was investigating ASI's ties to the nonprofit
2 corporations of Scientology. At that point he appointed himself
3 Chairman of the Board of RTC, which is his current title.

4 22. Although ASI was established as a for-profit,
5 non-religious corporation, in reality while DM was COB ASI the
6 staff of ASI ran the entire Scientology network. ASI had complete
7 control over the management of all Scientology orgs and missions,
8 all Office of Special Affairs activities, all transfers of funds
9 between church accounts and LRH accounts, every aspect of the life
10 of anyone who was a Scientologist, whether staff or public. These
11 powers were moved to RTC in 1987, as explained above.

12 23. Because of my experience in ASI I am familiar with the
13 day-to-day activities and procedures of the highest levels of
14 management of Scientology.

15 24. I have firsthand knowledge of the establishment of the
16 corporate structure of Scientology as it now exists, having worked
17 with the staff who were responsible for creating it. The purpose
18 of this activity was to create an impenetrable, legally defensible
19 network of corporations such that neither the IRS nor any other
20 legitimate agency of government could "pierce the corporate veil"
21 of Scientology organizations, thereby freeing Scientology
22 management to transfer funds between organizations without concern
23 for the law.

24 25. I am also familiar with the absolute authority which the
25 highest levels of Scientology management exercise over every
26 aspect of Scientology and Scientology-related organizations,
27 whether "church" or "secular," and the ruthlessness with which any
28 sign of disloyalty or disaffection is handled.

1 26. In September 1982 I was assigned to the Rehabilitation
2 Project Force ("RPF"), the Scientology version of a prison camp. I
3 was assigned to the RPF because I was openly critical of DM's
4 coercive and degrading treatment of staff members. I was on the
5 RPF in Los Angeles for eight months.

6 27. As a result of this experience I am familiar with the
7 absolute control which the highest levels of Scientology management
8 have over the behavior and thought processes of every Sea Org
9 member. There is only one way for a good Sea Org member to behave
10 and think, and any deviation from this is punished immediately and
11 severely. In turn, it is the responsibility of all members of Sea
12 Org management to bring about the same pattern of behavior and
13 thought in all Scientologists under their authority, regardless of
14 whether those under their authority are part of the "church" or
15 the various "secular" arms of Scientology. This distinction means
16 nothing within Scientology; it was created purely to facilitate
17 dissemination of Scientology and to fend off Scientology's
18 "enemies," such as the IRS.

19 28. From May 1983, when I was allowed off the RPF, until July
20 1984 I was posted as Course Supervisor at the International
21 Training Organization (ITO) in Los Angeles. From this position I
22 trained hundreds of fledgling Scientology executives from all over
23 the world on the administrative and management policies of L. Ron
24 Hubbard known as the Organization Executive Course, or OEC. As a
25 result of this experience I am very familiar with the
26 administrative policy of Scientology and know that Hubbard
27 formulated it to facilitate the establishing and organizing of his
28 worldwide network of Scientology organizations.

1 29. In August 1984 I was transferred back to the PR Division
2 of the Guardian's Office, which by that time had been renamed the
3 Office of Special Affairs. My primary functions were as a writer
4 and editor for FREEDOM Magazine, a Scientology publication created
5 to serve as a vehicle for attacking individuals and groups who
6 were perceived as threats to Scientology. I also wrote articles for
7 other Scientology publications.

8 30. As a result of my experience as a writer for these
9 different Scientology publications, I am familiar with
10 Scientology's practice of changing its story for whatever public
11 it is trying to manipulate. Often I rewrote the same basic story
12 for each publication, completely changing the wording and overall
13 thrust of the story to appeal to the different publics that were
14 going to read it.

15 31. As a writer in OSA I was also responsible for writing
16 rebuttals of negative stories about Scientology that were published
17 in various newspapers across the country. I was also assigned to
18 write rebuttals of books that were published that were negative
19 about Hubbard and Scientology. As a result of this work I became
20 very familiar with the policies and practices of Scientology with
21 regard to individuals and groups that criticize the organization.
22 I have personal knowledge that the practices which were formerly
23 called "Fair Game" continue to be employed, although the term "Fair
24 Game" is no longer used. These tactics are laid out in many of the
25 key policies that are studied and applied by staff of OSA.

26 32. In July 1989 my husband and I left Scientology. We lived
27 in San Diego from 1989 until August 1991, at which time we moved to

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1 Newport Beach. We are currently living in Corona del Mar,
2 California.

3 33. As a result of my experiences in Scientology I am
4 qualified to discuss the policies, procedures and practices of this
5 organization, including the treatment Steven Fishman received at
6 the hands of this organization.

7 34. I have read Steven Fishman's book, The Lonesome Squirrel,
8 and I have reviewed his testimony up to his sentencing. I have
9 viewed a 1981 videotape of Fishman under hypnosis by Dr. Uwe
10 Geertz, and I have viewed a 1989 videotape of Fishman being
11 interviewed by his attorney Mark Nurik and Dr. Richard Ofshe in
12 Fishman's home in Florida. Based on the review of these materials
13 and my knowledge and experience in Scientology, I do not believe
14 there is any doubt that Steven Fishman was driven to a psychotic
15 break (known in Scientology as "Type 3 PTS," a term which I will
16 explain below) by Scientologists, either deliberately or through
17 greed and gross negligence of his welfare.

18 35. It is utterly forbidden for anyone with a serious
19 psychiatric background, including an extensive history of hypnosis
20 such as Fishman had, to be allowed to have any Scientology
21 processing at all. Attached herto as Exhibit "2" is a copy of
22 Hubbard Commincation policy letter entitled "Illegal PCs,
23 Acceptance of High Crime PL. I have been advised by Mr. Berry that
24 it was well known by Scientology operatives that Fishman was not
25 eligible for processing because of his history of therapy with Dr.
26 Uwe Geertz; yet he was induced to buy more than \$100,000 worth of
27 Scientology books, written materials and prints, clearly being led

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1 to believe that he would be welcomed into the privileged circle of
2 dedicated Scientologists.

3 36. Furthermore, he was also induced to purchase three
4 E-meters (electro-psychometers), the device used in Scientology
5 auditing. E-meters are not used for anything else but auditing,
6 and they are not supposed to be sold to anyone without proof that
7 they are in training as an auditor.

8 37. But in the Scientology world there is a thing called
9 statistics, and Fishman was an unsuspecting victim of this system.
10 Every single staff member in a Scientology organization has a
11 statistic which measures his or her production. These statistics
12 are reported every Thursday to International Management in CSI.
13 For Scientology staff members, their lives virtually revolve around
14 making sure their statistics are rising every week. Many things
15 depend upon this. If their stats are down they may not be paid
16 that week. They may not be allowed to spend any time with their
17 spouse or children. They may not be allowed any time off at all,
18 and since they already work as much as 14 to 18 hours a day, one
19 day or even half a day off becomes very important, even if it is
20 only enough time to do laundry. If their stats continue to go
21 down over a period of time, they risk being assigned to the
22 Rehabilitation Project Force or "RPF," which is a Scientology
23 prison camp. Needless to say, people can become quite desperate
24 under these circumstances, and they will do just about anything to
25 get their statistics up.

26 38. Nowhere in Scientology is the push for statistics more
27 frenzied than in the departments responsible for bringing money
28 into the organization. Unfortunately Fishman appears to have been

1 the unwitting victim of a feeding frenzy which involved at least
2 nine different Scientology corporations. These people discovered
3 that Fishman had money and that he was willing to give it to
4 Scientology. They took his money even though they knew he would
5 never be able to receive any benefit from Scientology auditing,
6 even though they knew he could harm himself with the materials
7 they were selling him. Indeed, it is clear that Fishman was
8 overwhelmed by the Scientology materials he was given, to the point
9 of an actual psychotic break.

10 39. To understand how this could have occurred it is
11 necessary to explain briefly how Scientology processing works. In
12 essence, the theory behind auditing is that by confronting painful
13 incidents in the past one can free up mental energy that has been
14 locked up in these painful memories. L. Ron Hubbard created many
15 auditing processes which are supposed to help an individual
16 achieve greater sanity. But he made it clear that the processes
17 must be done in a precise way with no deviation. There are severe
18 penalties for anyone who deviates from the standard procedures.
19 Hubbard made it clear that it can be very harmful psychologically
20 and even physically to deviate from these procedures.

21 40. Certain situations can cause a person to have trouble in
22 auditing. The most serious thing that can hinder a person's
23 progress up the "Bridge to Total Freedom" (as the exact series of
24 auditing processes is known) is becoming a Potential Trouble
25 Source, or PTS. A PTS is someone who is being suppressed in some
26 way by another person or entity.

27 41. There are different types of PTSness. Some of these are
28 listed in an October 27, 1964, policy by Hubbard known as

1 "Policies on Physical Healing, Insanity and Troublesome Sources."
2 Attached hereto as Exhibit "3" is a copy of Hubbard Communication
3 Office Policy letter entitled "Policies on Physical Healing,
4 Insanity and Troublesom Scources". Ten types of PTSness are listed
5 in this policy letter, each one of which has to do with types of
6 people who have caused Scientology "considerable trouble." They
7 include people who have sued the church, newspaper reporters,
8 family members who are hostile to Scientology, etc. They are listed
9 as Type A through Type J, thus the policy has been nicknamed the "A
10 to J policy." When someone is labelled as being any of these types
11 of PTS, he or she is barred from getting any Scientology
12 processing (auditing) or training, because people who fall into
13 these categories have historically caused trouble for the
14 organization, either by bringing legal action against it or by
15 giving negative information to the press.

16 42. Steve Fishman was labelled Type A, which is "persons
17 intimately connected with persons (such as marital or familial
18 ties) of known antagonism to mental or spiritual treatment or
19 Scientology." He was also labelled Type C, which is "persons who
20 have ever threatened to sue or embarrass or attack or who have
21 publicly attacked Scientology or been a party to an attack and all
22 their immediate families should never be accepted for processing".
23 Fishman was labelled Type C because he had paid a large amount of
24 money for a set of Hubbard's taped lectures which he had never
25 received, and he had threatened to sue CSI after trying for months
26 to get his money back. (In Scientology one is never supposed to
27 step outside of the Scientology "justice system"; anyone who does

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1 Type 3 psychotic break if he were allowed training or auditing,
2 could yet he was sold thousands of dollars worth of materials
3 anyway, including an E-meter with a solo auditing capacity
4 permitting him to self audit. Thus, either intentionally or simply
5 out of greed and negligence, Scientology created a situation in
6 which Fishman would almost certainly suffer a psychotic break and
7 become a Type 3 PTS, as explained below.

8 46. The types of PTSness described earlier, Types A through
9 J, relate to different types of threat a person can pose to
10 Scientology. There are also three types of PTSness, known as Type
11 1, Type 2 and Type 3, which relate to a person's own state of mind
12 and physical health. A person will manifest PTSness through a
13 range of conditions, all the way from a minor cold to a more
14 serious illness (all illness is a sign of PTSness) to full-blown
15 insanity. All PTSness is the result of being connected to one or
16 more suppressive people, suppression being defined as "a harmful
17 intention or action against which one cannot fight back." A copy
18 of a Hubbard Communications office Bulletin entitled "Search and
19 discovery" and describing these PTS types is attached hereto as
20 Exhibit "5".

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

26 48. Type 2 PTS means that the person was connected to the
27 suppressive person earlier, either in this lifetime or an earlier
28 lifetime (it might have been 150 years ago, or 76 trillion years

1 ago - whatever is real to the person). Someone in present time
2 reminds the person of the actual suppressive person, and this is
3 making the person sick. Curing Type 2 PTSness requires extensive
4 auditing, usually on the PTS Rundown.

5 49. Type 3 PTS is the Scientology term for a fullblown
6 psychotic episode. It was my experience in Scientology that when a
7 person has a psychotic break they lose touch with the real world
8 and begin to hallucinate or imagine conversations, events, people,
9 and whole scenarios. Even after they recover they are never sure
10 what part of the experience was real and what they imagined.

11 50. The subject of Type 3 PTS cases is one of the dark
12 secrets of Scientology. No one is supposed to talk about it outside
13 of Scientology, and it is treated with utmost security when someone
14 becomes Type 3 PTS. The reason for this is obvious: people are not
15 supposed to be driven insane by Scientology, so it would be a
16 public relations nightmare to try to explain it. But more
17 importantly, the treatment of people who have psychotic breaks in
18 Scientology is a clear abuse of the mental health laws, and if such
19 treatment were brought to the attention of mental health officials
20 there is little doubt that Scientology would be subjected to public
21 scrutiny for its practices in this area.

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

1 so, such as by filing a police complaint or a civil suit, is
2 immediately disqualified for Scientology services.)

3 43. Furthermore, because of his background of hypnosis,
4 Fishman could never be eligible for Scientology services.

5 44. Despite the fact that he was declared PTS A and C, and
6 that it was known he had an extensive history of hypnosis by a
7 psychologist, thereby barring him permanently from Scientology
8 auditing and training, Fishman was sold over \$100,000 of
9 Scientology materials, including a huge collection of tape recorded
10 lectures by Hubbard (which are not supposed to be listened to until
11 one reaches a certain level of Scientology training), packs of
12 material that are only supposed to be seen by people in certain
13 staff positions, and, what is most shocking, three E-meters, one
14 of which was specifically designed for use by auditors on the
15 confidential upper levels of auditing. It is specifically designed
16 for use in solo auditing, which is auditing of oneself. It is
17 clear from his videotaped interview that this is precisely what
18 Fishman used it for.

19 45. This created an explosive situation, one which clearly
20 could lead to a psychotic break in Fishman. Even as recently as
21 September 1993, Ray Mithoff, Inspector General for Technology, the
22 most senior Scientology technical expert in the world, supervised
23 the auditing of a person in England who had had a psychotic break
24 as a result of her experiences with Scientology. A copy of
25 Scientology's report on this incident is attached hereto as exhibit
26 "4". This person had a psychiatric history, and the mixing of
27 psychiatric techniques with those of Scientology had caused the
28 psychotic episode. So it was obviously known that Fishman risked a

1 52. In Fishman's case, it is unclear whether he was driven to
2 this state of mind purely through fraudulent irresponsibility and
3 negligence, or whether it was done more deliberately, as described
4 in the following Hubbard lectures.

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

10 54. In a September 17, 1951, tape called "Some Notes on Black
11 Dianetics," Hubbard stated:

12 "A person can drive himself quite mad with
13 Dianetics without any trouble. What you have
14 concentrated on in your study of Dianetics has
15 been the process of making people well. That is
16 your emphasis line. But don't think for a
17 moment that that is any more than half of it.
18 There is as much data on how to make people
19 insane, uncomfortable, sick or dead as there is
20 on how to make them well."

21 A copy of the transcript of this taped lecture is attached hereto
22 as exhibit 6.

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

1 56. Hubbard explained how to do it in the following passage
2 from "Some Notes on Black Dianetics":

3 "With Black Dianetics, you could tailor make
4 any kind of insanity you wanted to. The person
5 might not manifest this the next day, maybe not
6 the next week or maybe not for thirty days.
7 Maybe three months later he is walking down the
8 street and feeling a little bit tired when
9 somebody honks an auto horn just right or
10 something of the sort, and all of a sudden he
11 goes crazy, and there he is - insane!"

12 57. In that same lecture Hubbard provided a blueprint for
13 getting someone incarcerated, just as Fishman was, without anyone
14 ever finding out that the person was set up:

15 "We find that nobody can protest an implanted
16 engram [meaning a hypnotic command given to a
17 person such as was portrayed in "The Manchurian
18 Candidate"] except the person into whom it has
19 been implanted. He is the only one who can
20 protest this. He is the only one who can sign
21 out a warrant. Even if he goes insane, nobody
22 can sign out a warrant. So he could say, 'Well,
23 it was Bill and I know it was Bill and I saw
24 Bill and Bill has taunted me with it since,'
25 and so forth, but if he has been pronounced
26 insane... he has lost his civil rights and he
27 can't issue a warrant. In other words, this is
28 legal murder, legal punishment and so forth.

1 Because the law does not know anything about
2 this, no laws exist to prevent it or inhibit
3 it."

4 58. In another tape called "The Complete Auditor, Part I,"
5 delivered on June 28, 1951, Hubbard said:

6 "Any one of us could take a human being and,
7 with malice aforethought, drive him stark,
8 staring crazy with greater efficiency than even
9 psychiatry does. What would you do to him? You
10 would just reverse all the things that you know
11 would help him: ... slug him with some drugs,
12 hit him in the face, take a hypodermic needle
13 to him so that you give him very painful but
14 unobservable somatics.... Then when he comes
15 out of it say this had never happened to him,
16 feed all the content back to him again by
17 telling him about other people's engrams or
18 even his own, convince him that he does not
19 really know what his reality is and convince
20 him that you are his friend. A person can't
21 take this; he would spin. That would be an
22 efficient job, but that could be done on a
23 person who was pretty doggone sane!"

24 A copy of the transcript of this taped lecture is attached hereto
25 as exhibit "7".

26 59. In still another tape, called "Outline of Therapy,"
27 Hubbard stated:

28

1 "Out of Scientology you could formulate a very
2 fine type of thought warfare. Works much
3 better than an atom bomb. An atom bomb just
4 kills people, but you could take thought
5 warfare and you could enslave them utterly. You
6 could make complete slaves out of them."

7 A copy of the transcript of this taped lecture is attached hereto as
8 exhibit 8.

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

16 61. Hubbard himself ordered that "reverse processes" (or
17 Black Dianetics) be run on people he felt were particularly
18 dangerous to Scientology. In a 1968 issue he declared several
19 people fair game (meaning they could be lied to, tricked or
20 destroyed), and instructed that they be run on reverse processes if
21 they ever came into an org. Additionally, he ordered that "Any Sea
22 Org member contacting any of them is to use Auditing Process
23 R2-45." This was a reference to the use of a .45 semi-automatic
24 pistol. Hubbard defined R2-45 as a very fast way of getting
25 someone exterior to their body. A copy of this 'declare' is
26 attached hereto as exhibit 9 (see item 7).

27 62. Even if no one deliberately set out to drive Fishman
28 psychotic, selling him materials that would completely overwhelm

1 him with incomprehensible information and then putting an E-meter
2 in his hands was nothing short of criminal negligence. There is
3 little doubt that Fishman used his E-meters to "audit" himself, an
4 action that could easily drive him into a psychotic break.

5 63. In the tape "Some Notes on Black Dianetics," Hubbard
6 himself described the dangers of self-auditing:

7 "...in Dianetics you are playing around with
8 highly explosive material. I would say that a
9 person using Dianetics in certain ways might
10 much more happily juggle two or three hand
11 grenades with their pins pulled. For instance,
12 take some of these people who run around
13 self-auditing: why don't they just go get a
14 gun? That is much simpler and quicker."

15 64. When I was in Scientology I was assigned to keep watch
16 over a young girl in her early twenties who became Type 3 PTS after
17 being forced to sever all communication with her family, because
18 they were upset about her involvement in Scientology. This incident
19 occurred in Hemet, California, at the international headquarters of
20 Scientology.

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

1 65. L. Ron Hubbard wrote a series of issues detailing what to
2 do when someone "goes Type 3." These issues comprise what is
3 called the Introspection Rundown, a rundown being a series of
4 specific actions to take to achieve a specific result in
5 Scientology processing. Hubbard felt that the Introspection
6 Rundown was a major breakthrough in the handling of psychosis, and
7 that people in mental institutions could be cured by following
8 these steps. A copy of the introspection Rundown is attached
9 hereto as exhibit 10.

10 66. The first step is to isolate the person completely from
11 everyone except the people assigned to watch over the person. This
12 is called "Isolation Watch." I was assigned to watch this girl, so
13 I studied the issues to ensure I would handle her correctly. We
14 were not to say a word around her. She was to have complete
15 silence to allow her to calm down (to allow her body thetans to go
16 back to sleep, although she could not be told about this, since she
17 was not up to that level in her processing). This went on for many
18 days as she was in a serious psychotic incident.

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

26 68. She was never referred to any mental health practitioner,
27 because Scientologists believe that all psychiatrists and
28 psychotherapists are completely evil. Hubbard preached the evils

1 of psychiatry so thoroughly that no one in Scientology would ever
2 consider letting a mental health practitioner examine anyone, even
3 someone who is in the middle of a psychotic episode. See several
4 examples of Hubbard's writings on psychiatry attached hereto as
5 Exhibit 11. This girl was not even given anything to calm her down
6 except a mixture of calcium and magnesium which was supposed to
7 relax her and let her sleep. It did not have that effect; this
8 girl could hardly sleep at all and soon became exhausted, which
9 simply compounded the problem.

10 69. After several weeks of this, the girl finally came out of
11 the psychotic episode and was immediately sent back to her family
12 to avoid a negative public relations situation or, possibly, a
13 lawsuit.

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

24 71. Cat was taken to the home of a wealthy Scientologist
25 outside of Los Angeles. The house was surrounded with woods and
26 there were no other houses in sight. There Cat was kept under 24
27 hour watch, known as "Isolation Watch" because the person is
28 isolated from everyone except those on the "watch." Although I was

1 not assigned to watch her, I was told that Cat became extremely
2 violent on several occasions, that she tried to jump through a
3 plate glass window, that she repeatedly said she wanted to kill
4 herself, and that she had no idea who she was or what she was
5 doing. This went on for several months.

6 72. I was told that when Cat came out of the psychotic break
7 she was audited on the Introspection Rundown. This is a series of
8 questions and procedures designed to get the person to stop
9 introspecting, based on Hubbard's belief that this would cure the
10 psychosis. On someone who is OT3, as Cat was, the Introspection
11 Rundown is audited on the body thetans that have gone out of
12 control and caused the psychotic break. The theory is that once
13 these body thetans are disengaged from the person's body, the
14 person will be able to get back in control of his or her own mind
15 again.

16 73. Maggie Butterworth, David Butterworth's wife, was usually
17 assigned to supervise any Scientologist in Los Angeles that had a
18 psychotic break, and I believe that she was in charge of Cat
19 Morrow, in close liaison with Sandi Wilhere, a highly trained case
20 supervisor in CSI who is one of the most senior technical experts
21 in Scientology.

22 74. Cat Morrow's case was particularly sensitive not only
23 because of the information that Cat had about the church's legal
24 affairs but also because she was married to Jim Morrow, one of the
25 key people involved in dealing with the IRS. Cat's psychosis could
26 not be allowed to compromise Jim's position, so her situation
27 required the highest security. Normally a staff member who goes
28 Type 3 is routed off staff or sent to the RPF after coming out of

1 the psychotic episode, but because Cat had dealt with such
2 sensitive material she was quietly reassigned to a low security
3 department where people could keep an eye on her and make sure she
4 remained loyal to Scientology.

5 75. A woman named Dorothy Geary was driven into a psychotic
6 episode under circumstances very similar to Steven Fishman's in
7 that she and her husband were coerced into giving Scientology a
8 tremendous amount of money for services they would never receive.
9 Her husband Robert, a dentist in Ohio, attended a seminar given by
10 Sterling Management Systems, which he later discovered was a front
11 for Scientology. Robert and Dorothy were both coerced into buying
12 Scientology training and processing after a Scientology "chaplain"
13 orchestrated a breach between them which threatened their marriage.
14 Dorothy was then coerced into going to San Francisco for
15 processing, while her husband flew back to Ohio to continue his
16 dental practice.

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

27 77. Finally they convinced Robert that Dorothy needed to fly
28 back to San Francisco. Upon arriving in San Francisco, Dorothy was

1 taken to a "mountain retreat," where no one else would see what was
2 taking place. Dorothy was kept there for two weeks, while her
3 husband had no idea where she was. Scientologists were trying to
4 induce Robert to buy more auditing while Dorothy was held in San
5 Francisco.

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

14 79. By the time the Gearys' attorney helped them both to
15 disentangle themselves, they had given Scientology close to
16 \$180,000. As Robert Geary described it, "This was money we
17 obviously could not afford to spend and without extreme undue
18 influence there is absolutely no way we would have ever spent such
19 sums. I have read a considerable amount about mind control and now
20 realize that my wife and I were under mind control." A copy of
21 the declaration of Robert Geary D.D.S. executed September 5, 1993
22 is attached hereto as exhibit 12.

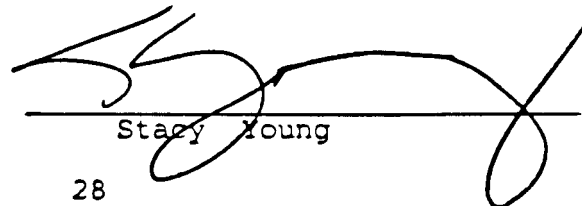
23 80. There are certain people within the Church of
24 Scientology, particularly RTC and CSI, who have knowledge of many
25 other cases of Scientologists having psychotic, Type 3 PTS
26 episodes. These people include the following: Ray Mithoff, whose
27 title was Inspector General for Technology in RTC when I left in
28 1989, although I have been told that he may now have the title of

1 Senior Case Supervisor International in CSI; Gelda Mithoff, a
2 highly trained auditor who has dealt directly with or supervised a
3 number of "Type 3 handlings"; Greg Wilhere, whose title was
4 Inspector General in RTC in 1989 and who is a highly trained
5 auditor; Sandi Wilhere, a highly trained auditor and case
6 supervisor in CSI; and, of course, David Miscavige (DM), who
7 supervises virtually every aspect of Scientology, particularly
8 anything that might threaten the public image of the church, such
9 as Scientologists who have Type 3 psychotic breaks.

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

22 I declare under penalty of perjury under the laws of the
23 United States and California that the foregoing is true and
24 correct.

25 Executed this 3rd day of January, 1994, at Los Angeles,
26 California.

27 
28 Stacy Young

1 PROOF OF SERVICE BY MAIL

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES;

3 I am employed in the County of Los Angeles, state of
4 California. I am over the age of eighteen (18) and not a party to
5 the within action; my business address is: 221 North Figueroa
Street, Suite 1200, Los Angeles, California 90012.

6 On January 3, 1994 I served the following document (s)
7 described as:

8 DECLARATION OF STACY YOUNG DATED JANUARY 3, 1994, AND FILED IN
9 OPPOSITION TO PLAINTIFF'S VARIOUS MOTIONS FOR PROTECTIVE ORDERS AND
10 IN SUPPORT OF DEFENDANT GEERTZ' VARIOUS MOTIONS TO COMPEL
11 DEPOSITIONS

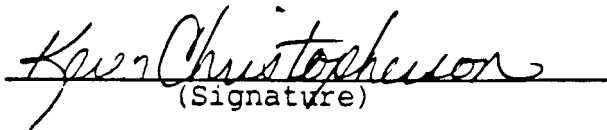
12 on interested parties in this action by placing ____ the original X
13 a true copy thereof enclosed in a sealed envelope addressed as
14 follows:

15 SEE ATTACHED SERVICE LIST

- 16 (x) (BY MAIL) I caused such envelope with postage thereon
17 fully prepaid to be placed in the United States Mail at
18 Los Angeles, California.
- 19 () (BY PERSONAL DELIVERY) I caused such envelope to be
20 delivered by hand to the office of the addressee.
- 21 () (STATE) I declare under penalty of perjury under the laws
22 of the State of California that the above is true and
23 correct.
- 24 (X) (FEDERAL) I declare that I am employed in the office of a
25 member of this court at whose direction the service was
26 made.

27 As follows: I am "readily familiar" with the firm's practice
28 of collection and processing correspondence for mailing. Under
that practice it would be deposited with U.S. Postal Service on
this same day with postage thereon fully prepaid at Los Angeles,
California in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after
date of deposit for mailing in affidavit.

(X) I declare under penalty of perjury under the laws of the
State of California that the above is true and correct and that
this declaration was executed on JANUARY 3, 1994 at Los Angeles,
California.


(Signature)

CHURCH OF SCIENTOLOGY INTERNATIONAL v. STEVEN FISHMAN, et al.
SERVICE LIST

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