

AFFIDAVIT OF JESSE PRINCE

I, Jesse Prince declare as follows:

1. I am over 18 years of age and currently reside in the state of Minnesota, County of Hennepin. This declaration is of my own personal knowledge and if called upon to testify to the facts herein I could and would be competently able to testify thereto.

2. I am intimately familiar with the Scientology organization, movement and beliefs because I was in Scientology for 16 years (1976-92) and served in the highest ranks, including as the second in command of the Religious Technology Center (RTC). At that time, my position was "Deputy Inspector General, External" which meant being in charge of all activities outside the body of Scientology. This included being in charge of all litigation by or against any Scientology organization, intelligence (spying, covert operations) brought against perceived or imagined "enemies" (which ranged from critics to media to the courts), trademark registrations, and the licensing of trademarks to other Scientology organizations, which was how we tightly controlled all Scientology corporations while creating the false impression of "corporate integrity."

3. It is incumbent on this and every court, as well as the authorities, to realize the amount of deception, chicanery,

lying, manipulation and outright criminality that Scientology will employ to hide the truth about their criminal activities. They will spend any amount of money to do this. I know because I was part of it for years. I received orders to break the law. I issued orders to break the law. I got others to break the law, and then I helped to hide these criminal activities just as they are hiding them now.

4. In fact, this tactic is one of the most coercive used by the Scientology hierarchy: to involve members in criminal acts for which they are then liable, which then prevents the person from speaking out. Even if the member manages to leave or flee, they will be reluctant to speak to the courts or the authorities because they were part of criminal activities. Plus the organization is ready to use Mafia-like tactics to threaten an ex-member if the hierarchy is afraid of their testimony. If the ex-member does speak, the organization will claim no knowledge and blames the individual, calling them a criminal when that person was doing nothing more than following orders under duress.

5. Members of Scientology are induced to confess to acts that, if not outright criminal, are embarrassing or possibly destructive to the person's job, marriage or profession, for example, shoplifting, adultery, masturbation, or drug abuse.

The member is urged to write these down in their own handwriting, under the guise that it is a "religious confessional" for the member's good. The truth is that these "confessions" are kept to blackmail and extort the member should they dare to speak out. The member is also coerced to sign documents that are self-damaging while protecting the organization, solely in case the member dares to leave their control and speak the truth. I know because I watched this done to others, I did it to others and it was done to me. That is why I respectfully urge this court to recognize Scientology's tactics and treat them for what they are: criminal deceit to defraud this court at any cost.

6. For the past five years since I fled Scientology, I have been silent because it was my intent to create a new life for myself, away from their obsessive control, and it required all the energy that I could muster to do that. About two weeks ago, I finally became curious as to what was happening within the Scientology world and I used the Internet to look up Scientology and was stunned to discover former friends who had also left and the conflicts being waged in the courts. I contacted one (Stacy Young) who had been a close friend for many years in the cult who told me what had been happening, with former members fighting to have the abuses and the criminality exposed.

7. Because I have intimate and personal knowledge of issues in this case, she put me in touch with attorney Dan Leipold and I traveled to his offices in Santa Ana, California. After speaking with him and others, I realized that this level of criminal fraud and deceit can no longer continue without opposition. I could no longer remain silent, regardless of their terrorism. I offered to tell the court how Scientology really operates with trademarks, copyrights and the courts. In fact, I am doing this at the risk of enduring the hate campaign this pseudo-religion will wage against me, as they have against others, including judges.

8. Let me begin with some basic information about my own Scientology history:

I first became involved with Scientology in September 1976, in San Francisco. In late 1976 I joined the elite Scientology paramilitary organization known as the Sea Organization, also known as the "Sea Org" or the acronym "SO." The Sea Organization is the actual nexus that controls the Scientology empire. Sea Organization personnel are authorized to take over and control Scientology organizations and to demote personnel, move bank accounts and run the corporation as if the SO personnel were employees or representatives of that corporation but they

are not. This is true if the organization was part of the "Church of Scientology" or one of the secular areas such as Bridge Publications. This is possible because the only personnel allowed into executive positions in these organization are those who are in full agreement that the Sea Organization is the commanding organization. This weeding out process guarantees there will be no executives who will resist or protect their corporate integrity. This is how the Sea Organization can operate with impunity, and continue to claim that it is merely a "fraternal organization." The Sea Organization is a "fraternal organization" the way the Cosa Nostra is.

9. Before I was recruited into the Religious Technology Center (RTC) in 1982, most of my experience was with Scientology technical material; the actual codified techniques used within the organization. This gave me considerable time to become familiar with the material, most of which was written by Scientology founder L. Ron Hubbard. It was that familiarity that prompted my promotion to a technical position at RTC.

10. Physically, I was transferred to and lived and worked at what is known as "Golden Era Studios," near Hemet, California. It is also known as "Gold" or simply "the base."

RTC's presence at Gold was fully known to all at the base, but was kept hidden from all others, to try to make it appear that Gold was merely a movie/tape production studio when really the movie/tape production is nothing but a front to mask, hide and protect the top of Scientology's actual power structure so they cannot be served with subpoenas.

(The security system is more befitting a top secret military installation, with its motion detectors, buried sensors, high-speed cameras, night cameras, guards on motorcycles, and barbed wire fences wired to detect anyone touching it etc.)

RTC was at that time the most senior, most powerful and most influential organization in all of Scientology. All at RTC were Sea Org members, as are all at the base. But because of RTC's position, we were the elite at the base.

11. In March 1983, I became the Deputy Inspector General, External, and a member of the Board of Directors for RTC, as Treasurer. (The only other board members were Warren McShane as Secretary and Vicki Aznaran as President, during this time.) At the time I was appointed a member of the Board of Directors of RTC I was forced to sign an undated letter of resignation. This is standard practice with all Scientology board members and is another means by which the

Scientology corporations are controlled while giving the appearance of corporate integrity.

12. In that capacity for the next few years, I traveled about the US and outside of the US on behalf of RTC. I traveled to Germany, Italy, Australia, the United Kingdom, Denmark, Mexico and Canada, with several trips to some of these countries. These trips were to put together an infrastructure that would then interface with RTC for the purpose of trademarks. I became familiar with the law with regard to each area, interviewed and approved law firms, and put the personnel in place that would report to RTC and be our on-the-ground representatives in dealing with the attorneys etc.

13. When Hubbard died in 1986, there was a power struggle in Scientology for the next 18 or so months that resulted in Hubbard's closest and most powerful aide (Pat Broeker) being removed. The power was taken over by David Miscavige who purged the organization of anyone who was friendly with Broeker. In mid-1987, I was removed from my position and put under armed guard at Happy Valley, a property the organization owns that is a few miles west of Gold and located deep in the Soboba Indian Reservation. I assume the undated resignation I provided on being appointed to the Board was then dated and used to make it appear that I had

resigned, when I had not. After a few months, it was decided that I would not escape and I was given various jobs at Gold but kept under watch. My pay was standard Sea Org pay, \$24 per week.

14. I should clarify why I (and others) tolerated such treatment for so long. The ability to tolerate such abusive conditions and treatment are one of the most basic requirements for promotion in the Sea Organization and RTC. We were selected and promoted because we vowed such loyalty and demonstrated it daily. Not unlike a military unit, it is the ability of the Sea Org member to take orders, carry out the assignment and to tolerate self-degrading conditions that ingratiates them to their seniors and to the system. That was why I was promoted so highly and why I then tolerated more. Looking back on it, I cannot believe that I actually tolerated such denigration and such abuse and actually deluded myself that it was for my good as well as the good of others.

15. In late 1991, my wife Monika became pregnant and although we were elated, she was ordered to abort the child. The reason for the abortion order is that Sea Org members were not allowed to have children. The order devastated both my wife and me. Our dedication as Sea Org members clashed violently with our intentions as parents and we went through



a personal nightmare with me opposing it, to no avail. She got the abortion and afterwards she was not the same. She was devastated at the impact of what she did and that was when she told me she wanted to leave. We fled, with the organization close behind us, trying to find us. They finally did and convinced us to return so we could "leave properly."

16. Once they had us again behind the barbwire and watched by security, my wife was threatened that if we did not sign certain papers, she would no longer be able to see her father and her sister, who were both in the Sea Organization.

17. This is another coercive power that the organization wields. Like a police state, it can order and enforce family members to alter their relations, and even get them to turn against each other. Monika and I knew that if the organization said she would be kept from her father and sister (by control over them), that she would not again be able to talk to them or see them, let alone visit. This is called "disconnection" in Scientology. We agreed to sign the papers and were able to leave.

18. On July 26, 1998, one of the cult's attorneys sent a long fax to Dan Leipold that is their first not-so-veiled threat to me, warning me to be silent. The attorney included

the document they prepared for me and that I signed under the conditions I just described. I am attaching his letter and the documents I was forced to sign under duress as my first evidence of what this criminal cult does to silence anyone speaking out. (Exhibit 1). It does not surprise me, as it is a standard tactic, to force a person to create or sign a self-damaging document to use when ready.

19. I have also been privy to the destruction and alteration of documents to protect the group. On or about April of 1983 I was present at a meeting, which took place in Los Angeles, California at a Scientology office called Author Services, Inc. (ASI). ASI presented itself as the "literary agency" for Hubbard but it was actually the top of the Scientology empire at that time. All of Scientology was being directed from ASI in 1982. ASI was where various Scientology corporations went to receive orders.

20. Present at the meeting was David Miscavige, then the chairman of the board of ASI, Vicki Aznaran then the Deputy Inspector General of Religious Technology Center, (RTC) and Lymon Spurlock, who was "Director of Client Affairs" for ASI. Mr. Miscavige expressed concern at this meeting that there might possibly be a raid on Scientology by the IRS. At that time, none of the churches of Scientology had received tax exempt status.

21. One principle reason why tax exempt status had not been granted was the IRS's position that Scientology founder L. Ron Hubbard (LRH) was actually the managing agent of Scientology in complete disregard of the corporate structure of Scientology. We knew this to be a fact but also knew that it violated IRS rules and thus had to be hidden.

22. There was concern that the IRS would obtain the hundreds of daily, weekly and monthly LRH orders written by Mr. Hubbard and distributed throughout Scientology. These orders were commonly referred to in Scientology as "advices" to avoid the appearance that LRH was actually running Scientology. In fact, LRH was running Scientology. The principle concern expressed at this meeting was that the LRH orders or "advices" would be used to name L. Ron Hubbard as the managing agent of Scientology.

23. Because of an already existing fear that an LRH "advice" might fall into the wrong hands, these orders from him were written in a way that we could deny it was from him. His name was not on them. He was never cited in the dispatch except in the third person. There was no signature and a salutation in reply was never more than "Dear Sir." The routing at the top referred to him merely as "\*", an asterisk. However if a person (or an agency) got enough of these, there would be little doubt that we were in touch

with Hubbard (via ASI) and he was telling us and each corporation what to do to make him more money.

24. David Miscavige specifically stated that ASI was "already dealing with the problem", ridding ASI of any documents that would implicate L. Ron Hubbard as managing agent of Scientology. He stated that under his directive the LRH orders, or "advices", were being collected and transferred by truck to a Riverside County recycling plant where the documents were to be "pulped". This method of destruction was considered to be better than shredding. I was also given instructions that I was in charge of purging the remainder of the Scientology organization of LRH orders. This was to include Church of Scientology of California (CSC); Church of Scientology International (CSI); and RTC.

25. Several weeks after this first meeting I attended a second meeting at the ASI offices concerning the continuing destruction of Scientology corporate documentation. In attendance at the second meeting were David Miscavige, Lymon. Spurlock, Vicki Aznaran, Norman Starkey and Marty Rathburn. At this meeting, David Miscavige for the first time stated that Scientology had been ordered by a court to produce various documents concerning a former Scientology member named Lawrence Wollersheim who had a lawsuit pending in Los

Angeles against the Church of Scientology of California.

The court had ordered Scientology to produce Mr.

Wollersheim's entire "preclear" (PC) file.

26. A "PC " file is one of several files kept on members. The PC file is the file that includes all written records of all "confessionals" done by the member. This means that it includes not only the most self-damaging material but it also reflects every problem the person might have had with the organization, including complaints. This PC file grows with the person's tenure in Scientology.

27. Mr. Wollersheim's PC file was several thousand pages in length and stood as high as a six-foot tall man. Initially at this meeting it was decided that Mr. Wollersheim's PC file would be redacted and culled of any evidence or documentation which might assist Mr. Wollersheim in his lawsuit against CSC. There was also concern that the materials known as Clear, OT I, OT II, OT III and NED for OT's (NOTS) would be open to public inspection if Mr. Wollersheim's files were produced as ordered.

Scientologists are taught that a person could catch pneumonia and die if that person is prematurely exposed to these "upper level" materials without first having taken many hours of preparatory auditing. Ultimately, approximately 50 pages were produced pursuant to the court

order. Mr. Wollersheim's PC file was culled based on a direct order from David Miscavige.

28. Later, I was informed that a second court order was issued to produce Mr. Wollersheim's entire file. Faced with the prospect of having to produce the entire file David Miscavige gave orders that the entire file simply be destroyed by being pulped.

29. Pursuant to Mr. Miscavige's orders I ordered Rick Aznaran to take Mr. Wollersheim's PC files to the recycling plant in Riverside to be pulped. Several hours after I gave the order to have Mr. Wollersheim's PC files destroyed, Mr. Aznaran returned and confirmed that the records had been pulped and even showed me a small bottle of pulped material, saying "Here's what's left."

30. The material that David Miscavige ordered destroyed and which Rick Aznaran had pulped was the same material that the court had ordered produced in Mr. Wollersheim's Los Angeles court case against CSC.

31. In early 1983 I attended a meeting at Scientology's ASI office in Los Angeles. In attendance at this meeting were David Miscavige, Lymon Spurlock, Vicki Aznaran, Patricia Brice and Edith Buchele. The meeting concerned Scientology copyrights. In particular, David Miscavige stated that Scientology was "in trouble" concerning the copyright status

of the many published materials of founder L Ron Hubbard. Concern was expressed that many of Mr. Hubbard's published materials had become 'public domain' because the materials had not been registered with the United States Copyright office for many years. David Miscavige stated that Scientology had failed to register copyrights for thousands of pages of Scientology material written by Mr. Hubbard. These records included the numerous policy letters and bulletins published by Mr. Hubbard. In particular, Mr. Hubbard published "Policy Letters" (always published in green ink on white paper and intended as administrative directives) LRH ED's (Executive Directives) which are used for various topics, (always issued as blue ink on white paper) and "Technical Bulletins" published with red ink on white paper covering technical aspect of Scientology such as Auditing techniques, Policy and Ethics.

32. At the same meeting in early 1983 David Miscavige specifically ordered Patricia Brice (who at the time was L. Ron Hubbard's personal secretary and an employee of ASI) to begin the process of mass copyright registration filings for all of L. Ron Hubbard's materials. This order was given despite the fact that Mr. Miscavige was already aware that many of the materials in question were already in the public domain. Thus, I know from personal knowledge that in mid

1983 Scientology began a massive program to register Mr. Hubbard's material with the United State's Copyright office.

33. Based on my many years of reading and studying Scientology directives including my time as a "Co-Audit Supervisor" and "Inspector General Cramming Officer" I became intimately familiar with the content, form, manner of distribution and publication of Scientology works and directives including the works of L. Ron Hubbard. As a Cramming Officer it was my job to insure that those who employ Scientology "tech" properly adhere to the official guidelines adopted by Scientology.

34. I was requested by counsel for Mr. Wollersheim to review the exhibits to BPI's renewed motion for summary judgement. These were contained in more than 20 banker's boxes.

In reviewing these boxes of exhibits I selected out documents at random to inspect. The chart below explains the result of my examination of certain of the exhibits. In examining the plaintiff's exhibits I compared the alleged LRH originals submitted by the plaintiff's as exhibits to some early editions of Scientology compilations which contains the policy issues in question. I employed a "1<sup>st</sup> edition" of the Organization Executive Course, and a "First



printing of the Scientology Technical Bulletins for comparison to what BPI has claimed are the LRH originals.

35. I have attached hereto copies of various LRH materials that were published by Scientology in the early 1970's that prove conclusively that the copy right notices on BPI's purported "LRH originals" were not present then, but placed on the "originals" at a later date.



| Exhibit | Date Issued          | Copyright Registration                             | Title   |   |
|---------|----------------------|--|---|---|
| B-1287  | 1954                 | 27 January 1975                                    | The Church of Scientology Creed                     | FACTNet copy bears no resemblance to original   |
| B-1289  | 1953, ca. end May    | 2 May 1956<br><br>(renewal 7 February 1983)        | LRH PAB No. 2<br><br>A Summary of SOP 8A            | Copyright notice 1953<br><br>Copyright res. for compilation published Dec. 1955   |
| B-1292  | 1953 ca. end July    | 2 May 1956<br><br>(renewal 7 February 1983)        | LRH PAB No. 6<br><br>No title                       | Copyright notice 1953<br><br>Copyright res. for compilation published Dec. 1955   |
| B-1293  | 1953 ca. mid. August | 2 May 1956<br><br>(renewal 7 February 1983)        | LRH PAB No. 7<br><br>Six Steps to Better Beingness  | Copyright notice 1953<br><br>Copyright res. for compilation published Dec. 1955   |
| B-1290  | 1953 ca. mid June    | 2 May 1956<br><br>(renewal 7 February 1983)        | LRH PAB No. 3<br><br>Certainty Processing           | Copyright notice 1953<br><br>Copyright res. for compilation published Dec. 1955   |
| B-4     | 2 June 1959          | 22 December 1987<br><br>(renewal 22 December 1987) | HCO PL<br><br>Purchasing Liability of Staff Members | Copyright notice 1959 but original contains reference to CSI which did not exist until 1981   |
| B-2     | 2 May 1957           | 24 December 1985<br><br>(renewal 24 December 1985) | HCO PL<br><br>Dissemination                         | Original offered by BPI is substantially different from that published as an original in OEC Vol. II 1* Ed. 1970 ; Copyright notice 1957, registration 1985 |
| B-1291  | Ca. mid-July         | 2 May 1956   | LRH PAB No. 5                                       | B-1291 BIP original   |

| Exhibit | Date Issued      | Copyright Registration                              | Title  |  |
|---------|------------------|---|--|--|
|         | 1953             | (renewal 7 February 1983)                           | About PABs   | contains no copyright notice. However FACTNet copy and copy of document published in 1 <sup>st</sup> printing of Technical Bulletins Vol. I contain 1953 copyright notice. Copyright registration is 1955 as part of compilation |
| B-1288  | 20 July 1956     | 22 September 1983<br><br>(renewal 26 December 1984) | Article From LRH to HGC Staff "How to really split a valance..." | No Copyright notice in claimed original  |
| B-371   | 16 December 1958 | 12 May 1983<br><br>(renewal 22 January 1986)        | HCOB Extension Course Curriculum                                 | BPI original contains notice 1958, however copy of document published by Scientology in 1976 in Technical Bulletins Vol. III 1 <sup>st</sup> printing contains no copyright notice   |
| B-59    | 21 March 1965    | 28 January 1988<br><br>(renewal 9 September 1993)   | HCO PL Staff Members Auditing Outside PCs                        | BPI original contains copyright notice 1958, however, copy of document published in 1970 OEC Vol. I 1 <sup>st</sup> Ed. contains no copyright notice.  |
| B-249   | 28 April 1973    | 28 April 1988                                       | HCO PL Good Service  | BPI original shows on face it was 1 <sup>st</sup> published Dec. 23, 1968, not claimed date of April 28, 1973  |
| B-157   | 2 September 1968 | 28 January 1988                                     | HCOPL Chaplain   | BPI original shows on face 1 <sup>st</sup> appeared as Sea Organization Flag Order   |
| B-94    | 24 August 1965   | 28 January 1988<br><br>(renewal 3                   | HCO PL Cleanliness of Quarters and Staff Improve                 | BPI "original" contains 1965 copyright notice. However, "original" references CSI which did  |

| Exhibit | Date Issued      | Copyright Registration                   | Title   |   |
|---------|------------------|--|---|---|
|         |                  | November 1993)                           | Our Image   | not exist until 1981  |
| B-248   | 27 December 1972 | 28 January 1988                          | HCO PL Speed of Service   | BPI original shows on face published 1968, not claimed date of 1972   |
| B-214   | 4 January 1971   | 2 May 1991                               | HCO PL Competence   | BPI original contains no copyright notice   |
| C-3     | 5 February 1958  | 27 January 1995                          | HCO PL No New Charters  | BPI original contains no copyright notice   |
| B-215   | 25 January 1971  | 28 January 1988                          | HCO PL Squirrel Admin   | Claimed original contains 1971 copyright notice. However, also contains reference to CSI which did not exist until 1981   |
| B-1     | 25 January 1957  | 24 December 1985<br>(24 December 1985)   | HCO PL Concerning the Separateness of Dianetics and Scientology | BPI original shows on face not original but Issue II  |
| B-369   | 25 November 1958 | 12 May 1983<br>(renewal 22 January 1986) | HCOB Step 6   | BPI "original" contains a 1958 copyright notice. However, 1 <sup>st</sup> printing of Technical Bulletins in 1976 Vol. III contains no copyright notice for this document |

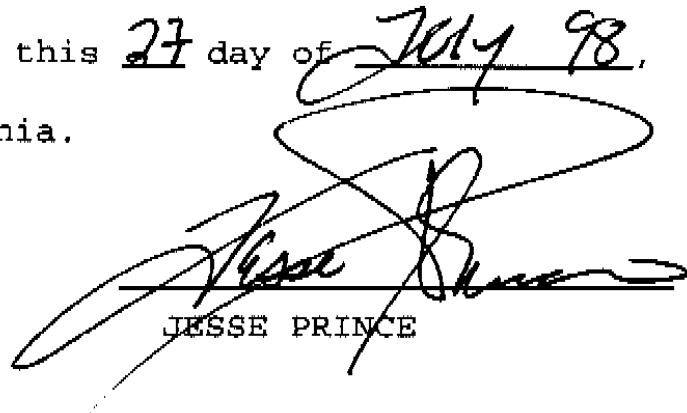
The above chart documents my observations in reviewing the documents that I selected at random to review. The important

points that I believe the Court should note with reference to these documents are as follows:

1. Exhibits B-1289; 1290; 1291; 1292 and 1293 contain a 1953 copyright notice. However, the copyright registrations submitted by BPI are for a compilation published in 1955.
2. Exhibits B4; B-94 and B-215 all contain copyright notices from the 50's, 60's and 70's that contain notations to CSI. CSI is the Church of Scientology International, which did not come into existence until 1981. Therefore, either BPI's "originals" are not originals as claimed, or the copyright notices were placed on these documents long after they were published. (Exhibits "I," "J" and "K").
3. Exhibits B-59; B-369; and B-371 contain copyright notices from 1958. However, when these originals are compared to first printings or first editions of compilations put out by Scientology in the 1970's, these copyright notices are not present, indicating that they were placed in the "originals" subsequent to the compilations being published.
4. Exhibit B-2 is substantially different from that published as an original in OEC Vol. II, 1<sup>st</sup> Ed. 1970.

5. Exhibit B-1287. The FACTNet copy bears virtually no resemblance to the BPI original.
6. Exhibits B-1288; B-214; and C-3. The BPI originals contain no copyright notice.
7. Exhibit B-1 shows on its face it is not an original but "Issue II."
8. Exhibits B-248; B-249; and B-157 show on their face they were published elsewhere prior to the claimed original publication.

I declare, under penalty of perjury that the foregoing is true and correct. Executed this 27 day of July 1998, 1998, at Santa Ana, California.



JESSE PRINCE