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1 the Commodore's Messenger Organization ("CMO"), ran the  
2 organization itself under the direct command of Mr. Hubbard  
3 (known as the Commodore), contrary to Mr. Hubbard's claims that  
4 he had resigned in 1966. The CMO directed all internal operations  
5 via an unincorporated group of highly dedicated Scientologists  
6 known as the Sea Organization ("Sea Org").  
7

8 4. In 1981, I was a senior executive in the United States  
9 Guardian Office ("USGO"). One evening we were informed that the  
10 Guardian Office was being taken over by the CMO, and from that  
11 time on Mr. Miscavige has had complete control over all branches  
12 of Scientology.

13 5. He wields his power through a small circle of trusted  
14 Sea Org lieutenants who obey him unquestioningly. His most senior  
15 aides are in RTC and include Greg Wilhere, who is the Inspector  
16 General ("IG"); Marty Rathbun, who is the Inspector General for  
17 Ethics ("IG Ethics"); Ray Mithoff, who is the Inspector General  
18 for Technology ("IG Tech"); and Marc Yager, who is the Inspector  
19 General for Administration ("IG Admin"). Another top aide is  
20 Norman Starkey, who is corporately the trustee of Mr. Hubbard's  
21 estate.

22 6. Mr. Miscavige also has top aides in CSI whom he orders  
23 either directly or via the above-listed RTC aides. These CSI  
24 aides include the Watchdog Committee ("WDC"), which is a group of  
25 Sea Org members who manage all of the different branches of  
26 Scientology, both secular and non-secular. Other top CSI aides  
27 include Kurt Weiland ("Mr. Weiland"), who is the commanding  
28

1 officer of the Office of Special Affairs International ("OSA  
2 Int"); Guillame Lesevre ("Mr. Lesevre"), who is the Executive  
3 Director International ("ED Int"); and Heber Jentzsch ("Mr.  
4 Jentzsch"), who is a PR front man with the title of President of  
5 the Church of Scientology International ("President CSI"). In  
6 reality, Heber has no administrative power at all and his duties  
7 are solely to deal with media and other PR groups.

8  
9 7. The power of the above-named individuals Messrs.  
10 Weiland, Lesevre and Jentzsch comes solely from Mr. Miscavige.  
11 Any one of them can disappear overnight and be sent to the prison  
12 camp known as the Rehabilitation Project Force ("RPF") if Mr.  
13 Miscavige so much as suspects any disloyalty. Mr. Miscavige's  
14 authority over RTC, CSI and (via these two corporations) the rest  
15 of Scientology, is absolute.

16 8. Since Mr. Miscavige took over the Guardian Office in  
17 1981, he has had total control over the entire Scientology  
18 organization, including all branches of Scientology management  
19 and extending out to every single person in the world who is a  
20 Scientologist. No one can challenge his authority. Mr. Miscavige  
21 can expel anyone from Scientology literally with a snap of his  
22 finger.

23 9. Mr. Miscavige's power came directly from L. Ron (Mr.)  
24 Hubbard, which is why his power is so absolute. Mr. Hubbard went  
25 into hiding in 1976 to avoid the IRS, several courts around the  
26 world and in the U.S., and a number of former Scientologists who  
27 sued Mr. Hubbard after they left the organization. Mr. Miscavige

1 gradually took over as Mr. Hubbard's eyes and ears until finally,  
2 by 1981, Mr. Hubbard gave him the authority to take over  
3 entirely.

4  
5 10. In 1981 Mr. Miscavige called himself Special Project  
6 Operations, or Special Project Ops. He set up offices in the CMO  
7 building across the street from the big blue building in  
8 Hollywood, and from this position he ran the entire Scientology  
9 operation. He had several people working directly with him in a  
10 unit called Special Project, including Norman Starkey ("Mr.  
11 Starkey"), Terri Gamboa ("Ms. Gamboa"), Lyman Spurlock (Mr.  
12 Spurlock"), my husband Robert Vaughn Young ("Mr. Young"), and  
13 others. These people ran all the PR, Legal and Intelligence  
14 functions that had previously been run by the Guardian Office  
15 line of command. The primary focus was the Mission All Clear, or  
16 MAC Unit, in the Legal Division of the Guardian Office. The  
17 purpose of this unit was to clear Mr. Hubbard's name from all the  
18 lawsuits that had been filed naming him as head of the church.  
19 This was Mr. Miscavige's prime directive: to clear Mr. Hubbard's  
20 name so he could come out of hiding.

21 11. Because he had the direct line to Mr. Hubbard, Mr.  
22 Miscavige also had authority over all of the internal Scientology  
23 management personnel. All communications from Mr. Hubbard came  
24 through Mr. Miscavige, and all communications to Mr. Hubbard went  
25 through Mr. Miscavige. There were only two other people more  
26 senior than Mr. Miscavige, Pat and Annie Broeker, because they  
27 were actually with Mr. Hubbard. An order from Pat or Annie had as

1 much authority as an order from Mr. Hubbard because they were so  
2 close to him.

3 12. But Pat and Annie were sequestered off at the Creston,  
4 California, ranch. Mr. Miscavige actually ran Scientology from  
5 the moment he became Special Project Ops.

6 13. In May 1982 the staff of Special Project, including Mr.  
7 Miscavige, moved to a suite of offices on Sunset Boulevard and  
8 became Author Services, Inc. (ASI). Mr. Miscavige changed his  
9 name to Chairman of the Board of ASI, Ms. Gamboa became Executive  
10 Director of ASI, Mr. Starkey became Legal Affairs Director, Mr.  
11 Spurlock became Corporate Affairs Director, Mr. Young became  
12 Public Affairs Director, and so on. Mr. Miscavige assigned me the  
13 job of Organizing Officer of ASI, which meant that I was  
14 responsible for making sure the staff were all doing their jobs  
15 properly. If they weren't, I was supposed to correct them.

16 14. During this time, from 1981 until Mr. Hubbard died in  
17 1986, I observed firsthand that Mr. Miscavige was systematically  
18 replacing Mr. Hubbard as head of Scientology. Publicly, ASI was  
19 promoted as a glitzy Hollywood literary agency dealing  
20 exclusively with the works of Mr. Hubbard. But behind the scenes,  
21 Mr. Miscavige was running all of Scientology from the ASI  
22 offices.

23 15. I was instructed, and all those who worked in ASI were  
24 also instructed, that making large amounts of money for Mr.  
25 Hubbard was an integral part of running Scientology. Mr. Hubbard  
26 made it very clear that Mr. Miscavige's success or failure would  
27

1 be based on how much money he could make for Mr. Hubbard, whether  
2 it came from church coffers or other sources.

3  
4 16. Mr. Miscavige made sure that as much money as possible  
5 was taken from church accounts. Fran Harris thought up  
6 "significances" that could be attached to huge lump sums which  
7 Mr. Miscavige then ordered to be transferred from nonprofit  
8 church accounts into ASI accounts every week. There was never any  
9 question that the church staff would transfer the money; if Mr.  
10 Miscavige ordered it done, it had to be done. If anyone refused  
11 to follow orders from Mr. Miscavige they were sent to the RPF  
12 immediately. I was told by my superiors (as well as by Mr.  
13 Miscavige) that Mr. Miscavige was acting as Mr. Hubbard's deputy,  
14 and that anything Mr. Miscavige ordered should be treated as an  
15 order directly from Mr. Hubbard himself.

16 17. The only thing that ever slowed these transactions down  
17 was making sure the significance attached to the transfer would  
18 appear legitimate to the IRS. Mr. Miscavige made Mr. Spurlock  
19 responsible for working out the legal details of these transfers.  
20 I often had to sit down with Mr. Spurlock and help him calm down  
21 after he had been ordered to legitimize some of Fran Harris's  
22 money-making ideas. Mr. Spurlock had many violent disagreements  
23 with Ms. Harris about the legality of her schemes, but Mr.  
24 Miscavige always sided with Ms. Harris and ordered Mr. Spurlock  
25 to "make it legal."

26 18. Mr. Miscavige also assigned Mr. Spurlock the task of  
27 sorting out all of the corporations so they would be legally

1 ---  
2 defensible in the eyes of the IRS. It was at this point that the  
3 huge conglomeration known as CSC was split up into many different  
4 corporations. Lyman worked out the whole shell, including all the  
5 relationships between the different echelons. He arranged for the  
6 Religious Technology Center (RTC) to have contracts with every  
7 single corporation that uses Mr. Hubbard and Scientology  
8 trademarks and copyrights in any way, including the management  
9 organizations, the service organizations, the businesses that use  
10 Mr. Hubbard's books, and so on. The real purpose of all of these  
11 contracts was to have a legal means by which to put anyone out of  
12 business who refused to tow the line as dictated by Mr. Hubbard.  
13 Since Mr. Hubbard's death, it is to put anyone out of business  
14 who refuses to tow the line as dictated by Mr. Miscavige. I  
15 worked directly with Mr. Miscavige while I was at ASI. I was  
16 horrified to discover that the senior-most person in Scientology  
17 was a ruthless, megalomaniacal tyrant. I had never worked with  
18 Mr. Hubbard personally, but I learned from others who had that  
19 Mr. Hubbard was the same way. Apparently Mr. Hubbard  
20 was prone to the same petulant temper tantrums that were daily  
21 occurrences with Mr. Miscavige. His style of management was  
22 screaming profanities and terrorizing the staff.

23 19. One day Mr. Miscavige gave me an insight into why he  
24 acted the way he did. He knew I did not approve of his cursing at  
25 the top of his lungs. We were having an executive meeting, and in  
26 the middle of a sentence he suddenly turned to me, very  
27 seriously, and said, "You think I yell loudly, but you've never

1 heard anyone yell until you've heard LRH [Mr. Hubbard]. I'll  
2 never be able to scream the way he does. But Stacy, that's the  
3 only way to get compliance."  
4

5 20. I realized then that Mr. Miscavige was trying to become  
6 as much like Mr. Hubbard as he could, and that he was preparing  
7 to take Mr. Hubbard's place when he died.

8 21. Anyone who disagreed with Mr. Miscavige or challenged  
9 his authority in any way was branded by Mr. Miscavige as a  
10 traitor who was out to destroy Scientology. This was why David  
11 Mayo was ousted, along with most of his staff. Many others were  
12 thrown out in 1981 and 1982 and replaced with people who would  
13 obey Mr. Miscavige's orders unquestioningly. Ray Mithoff, who  
14 replaced Mayo, is today one of Mr. Miscavige's top lieutenants.  
15 John Nelson, head of the CMO and director of all the Scientology  
16 organizations, was also ousted by Mr. Miscavige and replaced by a  
17 loyal follower, Marc Yager. Today he is another one of Mr.  
18 Miscavige's top people.

19 22. Mr. Hubbard was still alive when I was at ASI, and  
20 every staff member in ASI was required to report to Mr. Hubbard  
21 every week on the status of his or her sector of Scientology. No  
22 one slept from Tuesday to Friday because Mr. Miscavige repeatedly  
23 rejected the reports, insisting that they be rewritten until they  
24 were perfectly worded to appear that Mr. Miscavige had everything  
25 fully under control. No one was able to send any communication to  
26 Mr. Hubbard that wasn't edited by Mr. Miscavige (which meant that  
27 Mr. Hubbard effectively did not really know what was going on  
28

28 87-255.1



1 from 1981 until his death). This left the entire staff in  
2 terrible shape physically, and extremely vulnerable to Mr.  
3 Miscavige's brutal, coercive manipulation.  
4

5 23. Horror stories could be told by any Scientology staff  
6 member who has worked in close proximity with Mr. Miscavige. The  
7 only people who will talk about him, however, are those who have  
8 left, because as long as they are inside he holds the power of  
9 life and death over them. He can separate them from the spouses,  
10 separate them from their children, keep them from sleeping, keep  
11 them from eating anything but rice and beans, imprison them for  
12 years in the prison camps known as the RPF. His power is absolute  
13 and it has nothing to do with corporate boundaries. He wields his  
14 power via the Sea Organization, which is an unincorporated,  
15 fiercely dedicated, group of Scientologists.

16 24. Mr. Miscavige simply uses the corporations, as Mr.  
17 Hubbard did, to manipulate the courts and the IRS. The  
18 corporations were only created to fool the outside world, the  
19 "wog world," as Sea Org members contemptuously call it. Inside  
20 Scientology, the only boundaries are the ones Mr. Miscavige  
21 chooses to create, just as it was with Mr. Hubbard before him,  
22 and everyone knows it. In fact, now that Mr. Hubbard is dead,  
23 what Mr. Miscavige wants is senior even to what Mr. Hubbard  
24 policy says. Mr. Miscavige can violate policy and break the law  
25 whenever he wants to and no one can stop him.

26 25. Mr. Miscavige and his RTC and CSI lieutenants can walk  
27 into any Scientology organization and order anything they want or  
28

1 shut it down at whim.

2  
3 26. Nowhere has there been a clearer illustration of the  
4 emptiness of Scientology's corporate shell than the infamous  
5 Mission Holders' meeting in 1982. A transcript of this meeting is  
6 attached. Although Mr. Miscavige's profanity and many of his less  
7 elegantly phrased comments have been edited out, several things  
8 are still clear.

9 27. Mr. Miscavige, who at the time was officially COB ASI,  
10 was head of Scientology and senior to everyone else there. The  
11 other speakers included Mr. Spurlock, Corporate Affairs Director  
12 at ASI; Mr. Starkey, Legal Affairs Director at ASI; Mr. Mithoff,  
13 Senior Case Supervisor International in CSI (today he is a  
14 top RTC executive); Mr. Yager, CO CMO Int in CSI (today he is a  
15 top RTC executive); Mr. Lesevre, ED International in CSI; Steve  
16 Marlowe, Inspector General of the Religious Technology Center (he  
17 was later busted and replaced by Vicki Aznaran, who in turn was  
18 busted and replaced by Mr. Wilhere); and Wendell Reynolds,  
19 International Finance Dictator in CSI (he was later busted and  
20 spent several years on the RPF).

21 28. Mr. Miscavige (corporately part of ASI) and his  
22 lieutenants (corporately spanning RTC, ASI and CSI) were speaking  
23 directly to a group of people who held the franchise rights to  
24 various missions (missions being the lowest organizations on the  
25 Scientology totem pole). Yet there was no concern for corporate  
26 integrity that day in San Francisco. These Scientology leaders,  
27 on Mr. Miscavige's orders, expelled several mission holders on

1 the spot that day for being unhappy about what they were hearing,  
2 destroying their business with a snap of the finger. On Mr.  
3 Miscavige's orders the mission holders were ordered to pay large  
4 sums of money for a promotional campaign for the original  
5 Dianetics book, under threat of being investigated for crimes if  
6 they refused. They were ordered to pay large sums of money for  
7 many other "crimes," real or imagined, under threat of losing  
8 their business if they refused. The result was hundreds of  
9 thousands of dollars paid into CSI and RTC accounts from these  
10 missions.

11 29. Hundreds of people, including many mission holders,  
12 were expelled from the church during that time, all people who  
13 criticized Mr. Miscavige or refused to comply with his orders. He  
14 quickly made it clear that he could order any Scientologist,  
15 anywhere in the world, to do anything he wanted.

16 30. I was in the Office of Special Affairs United States  
17 (OSA US) in Los Angeles on the day in 1985 when a jury awarded  
18 Julie Christofferson \$39 million in damages for being harmed by  
19 Scientology. We had all expected to win the case. After all, Mr.  
20 Miscavige and his top aides had all been up in Portland running  
21 the whole thing directly. How could we lose? There was champagne  
22 and a huge, sumptuous buffet waiting for us, as soon as we  
23 received word on the win.

24 31. Instead, we got word that there was a \$39 million  
25 decision against the church. It was devastating. Dead silence  
26 fell throughout the entire building. For an hour, no one knew  
27

28 255.1

1 what to do. It was the most humiliating defeat Scientology had  
2 ever had.

3 32. And then suddenly all the OSA staff were summoned into  
4 one of the legal offices. Messrs. Miscavige and Starkey (Norman  
5 was Mr. Miscavige's legal affairs director at that time) were on  
6 the speaker phone. The decision was an outrage, Mr. Miscavige  
7 told us, and he would not permit it to stand. Every Scientologist  
8 from around the world was ordered to Portland, immediately. We  
9 were to spread the word by whatever means possible, arrange  
10 transportation, raise the money, do whatever we had to do to get  
11 the Scientologists there.

12 33. The staff of OSA did nothing but run various aspects of  
13 the Portland Crusade until the judge finally declared a mistrial  
14 several months later. The entire operation was overseen by Mr.  
15 Miscavige and his top staff, down to the smallest detail. Planes  
16 were chartered to fly Scientologists from Europe to Portland;  
17 donations were raised to print a special edition of the church  
18 publication, FREEDOM, about the "Religious Freedom Crusade" and  
19 distribute it door to door to every home in Portland; Mr.  
20 Miscavige even ordered students to leave course (unheard  
21 of in Scientology) to go to Portland.

22 34. The best time to observe how the Scientology command  
23 lines really work is during a disaster. The Christofferson loss  
24 of 1985 was the biggest disaster Mr. Miscavige had ever had to  
25 deal with, and all semblance of corporate integrity fell by the  
26 wayside in an instant.

1           35. The corporate structure collapsed again when Mr.  
2 Hubbard died in January 1986. I was ordered to ASI and briefed,  
3 along with a roomful of others from OSA US (Church of Scientology  
4 Western United States, or "CSWUS"), OSA Int (CSI), CMO  
5 International (CSI), Gold (CSI) and elsewhere, by Mr. Miscavige  
6 on what had happened. Then he went around the room and gave each  
7 of us our marching orders. (At the time I was part of an  
8 organization called North Star, a non-church corporation I had  
9 formed to put FREEDOM Magazine at arm's length from the church  
10 for public relations purposes. I was supposed to be under the  
11 command of OSA US (CSWUS), but Mr. Miscavige had also assigned us  
12 to do a research project for the Mr. Hubbard biography, so we  
13 took orders from both OSA and ASI.)  
14

15           36. Mr. Miscavige ordered me to write the copy for a eulogy  
16 of Mr. Hubbard. I worked directly with Norman Starkey and Mr.  
17 Miscavige to finalize the copy, and Mr. Miscavige gave the final  
18 approval. Then, under orders from Mr. Miscavige, I worked with  
19 Jonathan Epstein, a financial banking officer who was part of  
20 CSI, to arrange for several hundred thousand dollars to be pulled  
21 from various reserve accounts in a number of different  
22 corporations. These funds paid for the eulogy to be placed in  
23 major newspapers around the country as full-page ads.

24           37. After the ads were placed, Mr. Miscavige then ordered  
25 me to create a booklet about Mr. Hubbard to be used for  
26 promotional purposes. Again he ordered Jono Epstein (CSI) to pull  
27 funds from various church corporations to pay for a massive  
28

1 distribution of the booklet, including inserting it in several  
2 major newspapers in major cities as well as thousands of copies  
3 mailed out. The cost for this project came to approximately \$2  
4 million and was funded by reserve accounts from several church  
5 corporations, as ordered by Mr. Miscavige.

6 38. With Mr. Mr. Hubbard dead Mr. Miscavige moved quickly  
7 to consolidate his power. In early 1987 he removed the only  
8 remaining challengers, Pat and Annie Broeker, and switched his  
9 base of operations from ASI to RTC. It was a bloody coup, and Mr.  
10 Miscavige applied the scorched-earth policy to all who had ever  
11 had a kind word for the Broekers. My husband, who had worked with  
12 Broeker, was sent to the RPF along with many others. Only those  
13 who had remained steadfastly loyal to Mr. Miscavige were allowed  
14 to keep their jobs.

15 39. Today, the only people who survive  
16 are those who kowtow to Mr. Miscavige unreservedly and  
17 completely. He has truly become Mr. Hubbard's successor. He  
18 curses like him, screams like him, thinks like him, and rules  
19 with a ruthless, iron hand and a contempt for the outside world  
20 just the way Mr. Hubbard did when he was alive. 40. Just as  
21 Mr. Hubbard did, Mr. Miscavige has created many corporate layers  
22 between him and the courts, and he deals them like so many cards  
23 when it is convenient. But it is Mr. Miscavige who really holds  
24 the power, and because he is COB RTC, RTC is the only corporation  
25 with any real power.

26 41. CSI is only a lackey corporation. The function of the  
27 staff members of CSI is to carry out Mr. Miscavige's orders. If a

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1 CSI staff member refuses to comply with Mr. Miscavige's orders he  
2 or she is removed from post and sent to the RPF. CSI has no more  
3 independent authority than any other church or non-church  
4 corporation in the Scientology network. Its authority (indeed,  
5 its existence) is solely in the hands of Mr. Miscavige. If he  
6 decided to rearrange the corporate structure again he could do  
7 away with CSI altogether and create an entirely new corporation  
8 in its place. This is the extent of his power over the  
9 Scientology network, including CSI and RTC.

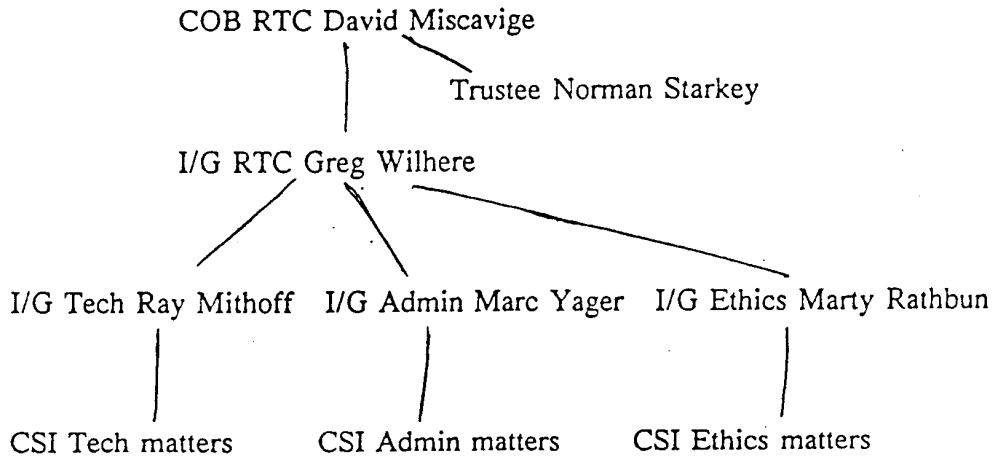
10 42. There is no one else who can represent Scientology.  
11 Everyone else is only speaking in Mr. Miscavige's place. He is  
12 telling them what to say and what not to say, and if they make a  
13 mistake, they feel his wrath. If they make a big mistake, they go  
14 to the RPF. If they ever told the courts what they really know,  
15 Mr. Miscavige would have them expelled from Scientology and  
16 labelled Fair Game, like many others before them.

17 43. As COB RTC David Miscavige controls Scientology via  
18 several key lieutenants, who have absolute authority to carry out  
19 DM's orders. These lieutenants include Greg Wilhere, who is the  
20 Inspector General ("IG") of RTC; Marty Rathbun, who is the  
21 Inspector General for Ethics ("IG Ethics") of RTC; Ray Mithoff,  
22 who is the Inspector General for Technology ("IGTech") of RTC;  
23 and Marc Yager, who is the Inspector General for  
24 Administration ("IG Admin") of RTC. Another top aide is Norman  
25 Starkey, who is corporately the trustee of Hubbard's estate but  
26 is also a troubleshooter for DM and who must be obeyed when he is  
27

operating under DM's orders.

Scientology Command Structure.

44. The structure looks like this:



45. The attached chart shows that RTC runs CSI and CSI runs the rest of the Scientology network. CSI has no power without RTC's authorization.

Ray Mithoff, I/G Tech, Is A Managing Agent Of CSI.

46. I/G Tech Ray Mithoff has command lines via CSI to all churches, missions and any other organizations that deal with the auditing and study technology of Scientology. His primary contact points are the Senior Case Supervisors in the various organizations. In CSI these are in CMO Int and OSA Int. All directives concerning the technology must be authorized by I/G Tech, who in turn must get approval from the I/G, who in turn must be authorized by DM.

Marc Yager, I/G Admin, Is A Managing Agent Of CSI.



1  
2 47. I/G Admin Marc Yager is responsible for managing all of  
3 Scientology administratively and has command lines via CSI to all  
4 churches, missions and other Scientology organizations. His  
5 primary contact points are the executive directors of each  
6 organization, called commanding officers in the upper management  
7 Sea Org units. In CSI he orders via CO CMO Int and ED Int. He  
8 also orders the members of the Watchdog Committee, who manage the  
9 various branches of Scientology. All directives concerning the  
10 administration of Scientology must be authorized by I/G Admin,  
11 who in turn must get approval from the I/G.

12 Marty Rathbun, I/G Ethics Is A Managing Agent Of CSI.

13 48. The same is true for I/G Ethics Marty Rathbun. He  
14 oversees all ethics matters in Scientology. Within each  
15 Scientology organization he authorizes all actions taken by the  
16 Ethics Officers. He also runs the Office of Special Affairs,  
17 which deals with all matters external to Scientology such as  
18 public relations, litigation, intelligence actions, and so on.  
19 OSA also has an internal security function within the Scientology  
20 organizations, and I/G Ethics commands all of those actions as  
21 well. He runs all OSA activities via OSA Int, which is in CSI.  
22 All directives concerning ethics matters within Scientology  
23 organizations, and all directives concerning OSA activities of  
24 anykind, must be approved by I/G Ethics, who in turn must have  
25 approval of the I/G.

26 49. This is the power of the I/G over CSI. Nothing is done  
27 in CSI that hasnot been approved by the I/G, either directly or

1 via his direct juniors, I/G Tech, I/G Admin and I/G Ethics.

2 Norman Starkey, Trustee of Hubbard's Estate, is a Managing  
3 Agent of CSI.

4  
5 50. Norman Starkey is the most senior lieutenant of COB RTC  
6 David Miscavige and has often been given authority by DM to order  
7 into CSI.

8 51. In 1981 DM put Starkey in charge of the Guardian  
9 Office, including running all the Scientology litigation in the  
10 world. As Special Project In-charge, Norman was the person most  
11 senior to what became OSA Int, which is part of CSI.

12 52. In 1982 Norman Starkey became Legal Affairs Director at  
13 Author Services, Inc. (ASI) directly under DM. DM was COB ASI at  
14 that time and ran all of Scientology from this for-profit  
15 corporation, a corporation which supposedly had no ties  
16 whatsoever to the Church of Scientology. It had no corporate  
17 ties, but in reality ASI ran the entire church from 1982 until  
18 1987, when DM decided to move over to RTC and become COB RTC. This  
19 was done because it was more defensible to run the church from a  
20 non-profit corporation than from ASI.

21 53. When DM moved over to RTC Starkey continued in his  
22 position as executive director of ASI and continued to send  
23 orders into the church, but via a unit called Corporate Liaison  
24 to dilute the connection.

25 54. In March 1985 Starkey filed a declaration in The  
26 Founding Church of Scientology of Washington, D.C., Inc. v.  
27 Director, Federal Bureau of Investigation, et al. in which he

1 attempted to cover up L. Ron Hubbard's role as managing agent of  
2 Scientology. As part of his declaration he provided a  
3 white-washed version of how Author Services, Inc. was  
4 established, describing it as if he and Terri Gamboa just thought  
5 of the idea one day out of the blue, as opposed to Hubbard  
6 ordering every last detail of the company and how it would  
7 operate.

8  
9 55. He also attempted to distance ASI from the network of  
10 Scientology organizations, falsely stating that ASI was not in  
11 the business of managing the Church of Scientology, although all  
12 aspects of Scientology management were at that time run out of  
13 DM's office at ASI.

14 56. But in paragraph 7 of his declaration Mr. Starkey made  
15 a startling admission, namely that the Sea Organization called  
16 upon him "from time to time" to render his services "to the  
17 propagation of this religion."

18 57. What he meant by this, and what is still the case, is  
19 that as the senior officer of the Sea Org, Mr. Miscavige can  
20 order Starkey to carry out whatever orders he deems appropriate,  
21 including but not limited to directing the affairs of CSI and,  
22 via CSI, other Scientology organizations.

23 58. As ED ASI, Starkey ran programs and projects that were  
24 initiated by his juniors at ASI who were ordering church  
25 personnel in writing in person and on the phone on how to conduct  
26 business within the church to produce income for ASI (and,  
27 therefore, Hubbard). All of this was done with the knowledge

1 and consent, if not under the direct orders of DM. Regular reports  
2 were made by ASI staff to Starkey regarding the programs,  
3 projects and orders he issued that involved CSI staff and  
4 operations.

5 59. CSI President Heber Jentzsch received orders regularly  
6 from DM and Mr. Starkey on how to conduct his office and how to  
7 conduct public relations actions as if they were his own ideas  
8 (so as to hide the command lines from DM and Starkey)

9 60. Church staff also know that disclosure of the  
10 relationship between Starkey and CSI or any admission that ASI  
11 was in direct command would have been reason to remove them from  
12 their position and have them transported to the Rehabilitation  
13 Project Force about one hundred miles away. (People on the RPF  
14 are kept under 24-hour guard to keep them from escaping.)

15 61. In a number of photographs of David Miscavige at public  
16 events, Norman Starkey can be seen standing next to DM,  
17 surrounded by his other loyal lieutenants. Several of these  
18 photos are included.

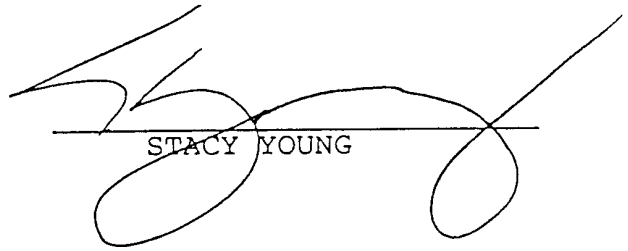
19 62. In short, the only person who is in a position to talk  
20 about all of the inner workings of the Church of Scientology is  
21 David Miscavige, because he is the only person who won't be  
22 punished for doing so. There is no one above him to punish him.  
23 He alone can tell the whole truth.  
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I declare under the penalties of perjury that the foregoing  
is true and correct.

Executed this 10th day of December, 1993, at Los Angeles,  
California.



STACY YOUNG