

AFFIDAVIT OF MARJORIE HANSEN

I, Marjorie Hansen, of Hanover, Massachusetts depose and state as follows:

On or about April 16, 1978, I was walking on Boylston Street in Boston when I was approached by a man named Kevin, who asked me if I would consent to taking a "Personality Survey". Kevin stated that he was working on the survey for some college courses he was taking. He then led me to a building on Beacon Street which I later found out to be owned and operated by the Church of Scientology.

After taking the "Personality Survey", which turned out to be identified as "The Standard Oxford Capacity Analysis", another employee reviewed the results of the test with me. He claimed that I was deficient in my communication with other people and that the Church of Scientology offered a "Communications Course" which would be guaranteed to solve my alleged communication deficiencies.

I was then introduced to Amy Ray who gave me an extended sales presentation and showed me Scientology literature, claiming that the communications course, together with a process called "auditing" would bestow numerous benefits on me, including raising my I.Q., preventing colds, curing or preventing

various physical illnesses, increasing my career potential and solving problems dealing with relationships and marriage. Amy Ray told me that auditing was confidential. I finally agreed to take the course at the price of \$35.00 whereupon I was taken up stairs and introduced to my course instructor.

He gave me more specific instructions about the course and demonstrated the "E-Meter", which is a type of a lie detector used during the auditing process. He told me that "auditing" was confidential between myself and my auditor. The course instructor arranged a schedule for me to come into the "Org" every night during the week, beginning immediately, in order to take the course.

While taking the communications course, I was approached by Kevin Tighe, the "Procurement Officer" at the "Org", who took me into his office and showed me various books, pamphlets and writings of L. Ron Hubbard, promising, and in some cases guaranteeing, how Scientology and auditing would give me all of the aforementioned benefits together with preventing war, helping mankind and helping the individual to be a stronger and better person. He then asked me if I would like to become a member of Scientology and work on staff. I told him that I didn't think I would be able to because I had a full-time job and that it would be too much for me to work for them Monday through Friday nights and all day Saturdays and Sundays.

Kevin said that an arrangement could be made where I would have less hours than other people and still be a part of Scientology's attempt to improve the world. So, I then became an "expeditor" and worked at various jobs at the Org which basically involved being a messenger.

While working as an expeditor, my various jobs included:

1. Going out to the street and passing out literature;
2. Writing letters to people who had bought a book, signed up for a course, or just anybody they had a file on, to try to get people to come into the "Church";
3. Typing personnel lists;
4. Running errands to stores for lunches and supplies;
5. Working on their newspaper;
6. Filing.

Also, during the communications course, I was required to do training routines, or "Tr's" as they are called by Scientology. Basically, TR's consisted of following the instructions of the course leader with regard to a lot of very simple little actions that one normally performs in every day life together with other types of responses to people. For instance, I was required to sit across from another person and

stare into their eyes and respond in a certain way to questions asked of me. I was persistently told to respond to certain stimulus in a certain way and in no other way, and to channel my thoughts and my behavior in accordance with Scientology "technology". Sometimes I was subjected to "bullbaiting" sessions in which the person sitting across from me attempted to make me react to something he said or did, and I was required to respond without any reaction or emotion. I was told the purpose of this routine was to make me comfortable when confronting or dealing with someone else. On one occasion, while "confronting" another person, I got up to go to the ladies room, and the course supervisor and his assistant went into the hallway looking for me and reprimanded me never to leave the room again while doing the training routines. I was told that exact adherence to the technology was required if I was to obtain the benefits sought in the course. As the course progressed, the technology became more strict and covered a wider pattern of behavior and I was required to respond in accordance with the increasingly strict "technology".

On another occasion during the course, I was approached by an individual named Norman Berkenshaw who again demonstrated the benefits that auditing would have for me and who showed me additional literature about how auditing worked and how

much it would help me. I was again told in this meeting that auditing was confidential and anything that I told my auditor during the auditing sessions would never be disclosed to any other person, but that it was like "confession" between myself and the auditor. Shortly thereafter, I was approached by another individual who went over the "Auditing Chart" with me and gave me more information about it and more promises and guarantees of how successful it would be.

I was introduced to Sam Pollock who was in charge of auditing sales. One of his responsibilities was to help a person get auditing by whatever means available. He was the first one to inform me that auditing would cost at least \$3,000 for three sessions which I was told would be the minimum needed in order to obtain the advantages promised me. When he told me the price for auditing, I told him that I couldn't afford it and that if Scientology was interested in helping people and improving the world and auditing was so beneficial then it was ridiculous for it to be so expensive.

After my meeting with Pollock, I was never left alone about getting money for auditing. I was constantly approached by numerous people at the Org who cited all the benefits of auditing to me and told me that if I could borrow the money, after I had obtained the auditing, my abilities would be so much greater that I could easily go out and repay whatever

loans I took out. I was questioned concerning my family members, friends, bank accounts, property and any other sources of money that I had. They specifically questioned me about taking out a loan from a bank. I told them I would be unable to do so unless my mother co-signed for it and that she would never do it for auditing. I was told to tell my mother that the money would be for "tuition" for me to go to school at the "Academy of Scientology" in order to take courses to become a social worker dealing with drug rehabilitation. I was specifically told not to mention auditing. Pollock, Urich and an individual named Tim all told me to have my mother come in and they would tell her about the courses I would be taking to become a social worker. After a great deal of pressure, I finally agreed to have my mother come in and they told her all of the above lies. On their representations she agreed to co-sign for the loan. They then made me go to the bank the very next day in order to get the money. I was told to be in constant contact with Pollock. When I went to the bank and filled out the application the bank officers told me it would take about a week to approve and process the loan. I called Pollock and told him this, and he told me to go back to the bank and tell them that I needed the money immediately because I had to meet a tuition deadline. I went back to the bank and the bank agreed to rush it through for

me. When I called Pollock again and told him that I had the check and told him that I would bring it into him that night, he said to bring it in immediately. I said that I was unable to do it and that he could wait until that evening. He then said that he would send Joan Gambino and Tim to meet me at the Vallee's Steakhouse parking lot in Braintree in order to pick up the check. I then told him that I wanted a receipt for the money and that I didn't want to just hand them a check for \$3,000 in a parking lot, but they said that they had to have it immediately and I should calm down and look at it all as a "game".

Shortly after I gave them the check for \$3,000, I learned that staff members did not have to pay for auditing. I became rather upset and I told them that since I was now on staff I should receive auditing free of charge and that I shouldn't have been charged \$3,000 for the auditing which at that point I had not yet begun.

While on staff, I was informed that I was to become the personnel control Officer (PCO). As the PCO I was trained to do the following things:

1. Testing prospective staff members;
2. Keeping staff member files in order;
3. Going through staff member files to extract information on their backgrounds;

4. Reporting any information that came to my attention about staff members who showed an inclination to leave the Boston Org for any reason, and going through their files to extract contracts and other documents that they signed.

I later learned that the purpose of my work was for the supervisors to control and if necessary to threaten staff members with the potential "trouble" that would result to them if they left the Church. In addition, they were told that if they left the Church they would owe X amount of dollars. On one occasion, I assisted Angus McDuffy in this procedure. Before I was allowed to begin auditing I was required to make a list of all of my relatives and friends who might have an influence over me in connection with the auditing. I was told that if any of these people were in any way opposed to Scientology I would have to "handle" or to disconnect from them. The day before my auditing started, I was escorted by David Scimemi, my auditor, to my sister Donna's house in Plymouth to make sure she was properly "handled".

In the first session of auditing, we spent approximately two hours in "word clearing". In view of the amount of money I had paid I thought that this was a waste of time. Thereafter, we began to do "run downs" in which they asked me questions

about most aspects of my life, such as my relationship with my parents; things that I knew my parents had done; things that I had done; my sexual history; and any knowledge that I had of crimes by myself or other people. I later learned that the results of these were given to another person called the "case supervisor", contrary to the representations made to me that the auditing would be confidential. After a few auditing sessions, I realized that not only were the sessions not helping me, but that I was becoming very emotionally and mentally distressed. Some of the sessions were very tiresome and frustrating and I began to think that unless I could make the needle on the E-Meter "float", I would never get out of the session. So I began to guess at the results that they were looking for in order to terminate the session. At times, despite the questions asked of me, I would try to remain "calm" inside in order to achieve a floating needle. After awhile, I felt that if I didn't do this I would have a nervous breakdown right after the session.

I was told that auditing was absolutely confidential between myself and the auditor. After one of my sessions, I was approached the next day by Joseph Urich, Sal Ilasi, Angus McDuffy, and other staff members who questioned me about certain things that I had disclosed in auditing. At one point Urich required me to sign a statement releasing Scientology from

any liability or preventing me from claiming a refund of money for anything that I disclosed during auditing. I was told that if I didn't sign this document I would not be able to continue auditing even though they already had all of my money.

During the course of auditing I was specifically ordered to disconnect from nearly all the people I had known before Scientology. I had informed them that one very close friend of mine was opposed to Scientology. They ordered me to request him to come into the Church and then ordered me to sit down and write out a statement telling him that I was never going to communicate with him again. When he came into the Church I was ordered to give him the statement and verbally tell him that I was cutting off all forms of communication with him.

With regard to other people they simply made me sign a statement that I would totally disconnect from these people.

Gradually, I became aware of the fact that I was becoming more and more isolated from my family and from my friends and I was becoming dependent on Scientology. I was also becoming nervous and upset and more obedient to whatever they told me to do. As I became aware of this fact, I didn't go to the Org for a couple of days. I was called at home and ordered to come in immediately. I was then told that I must be con-

nected to a suppressive person, otherwise I would not have stayed at home. I had seen what they had done to other people who had demonstrated an inclination to leave, and I was told and shown documents pertaining to the "Fair Game Doctrine". In short, the doctrine authorized the practice of deceit, fraud, trickery, intimidation, harassment, and the "destruction" of any Scientology critic. The staff leaders cited Paulette Cooper, the author of The Scandal of Scientology, as a person who must be attacked and prevented from making any other statements on Scientology. The existence of this Fair Game Doctrine and its actual application to Paulette Cooper evoked fear and caused discomfort and emotional torment. I feared similar attacks if I chose to leave the Church which caused further distress. Having this in mind, I was extremely fearful of them and decided I had better return to discuss the matter with them. When I returned they sent me to the "Ethics Department" where I was told I had to overcome these "evil" purposes in me that were affecting my attitude toward Scientology. At this point they told me to take 5,000 milligrams of Vitamin C per day and to continue in my courses.

Shortly thereafter, I tried a second time to leave Scientology and I was constantly hounded by them and commanded to again discuss it with them. I was told to do a "case analysis"

to find out what was creating this attitude toward Scientology. I told them that I just wanted to be left alone and that I wanted to get out. At this point, Joseph Urich told me that he wanted me to be a member of Scientology and that if I didn't show up for class that they would come and get me. He showed me the policy manual which allows them to come and get a "blown" student, by force if necessary, for the good of the student! At this point, I felt extremely fearful, trapped, and thought that I would never be able to escape from these people.

I had seen them separate so many people from their families, and friends, and pressure so many people into paying money, telling lies, and making bizarre plans to overthrow the government and eventually the world, I felt that if I didn't leave I would become insane and that eventually my life would be in jeopardy. After I didn't show up on a particular evening, someone from the Org called me and asked me where I was. I told them that I was not ever coming in again, that I felt cheated and deceived, and that they were destroying the lives of many people. I told them I was going to go to a lawyer to try and get my money back and to stop them from harassing me. I then left the house that evening. Later, when I returned home, my brother told me that three Scientologists had been at the house looking for me and had sat outside waiting for me to return, and had

finally left.

Subsequently, I contacted the Attorney General's Office and informed them of the type of activities involved at the Church of Scientology on Beacon Street. I thereafter authorized my attorney, Michael J. Flynn, to institute suit against them.

This Affidavit is signed under the pains and penalties of perjury. Those facts of which I have personal knowledge are true. Those facts of which I do not have personal knowledge, I believe to be true. Since this affidavit covers approximately five (5) months, many of the dates set forth herein may not be precisely accurate but I have stated my best memory as to said dates.

Dated: March 5, 1980

Marjorie J. Hansen
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