

## DECLARATION

I...hereby declare:

1. I am over the age of eighteen, of sound mind and body, and not under the influence of any drug or other substance that would affect my memory or ability to tell the truth. I have personal knowledge of the facts that I set forth in this Declaration, and if called as a witness in any proceeding, I could and would competently testify to those facts.

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3. I reside in California and am a member of the Church of Scientology International.

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5. I have been a member of the Sea Organization since early 1988.

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7. I have seen... unending care, compassion and dedication as the leader of our religion to carry out the goals L. Ron Hubbard set for the Church –for the individual staff members who are employed by the church, the parishioners of our Church and our Church as a whole body.

8. I am providing this Declaration based on my first-hand knowledge, observation and personal experience in working with Mr. David Miscavige and other Church Officials for nearly two decades.

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9. I first met Mr. Miscavige in 1988 on the SMV Freewinds and later worked under his direction, beginning in 1993 to participate in a management program to renovate and establish expanded quarters and new buildings for delivering the utmost quality of advanced church services at the Flag Land Base.

10. Being involved in Church management and expansion at the Flag

Land Base until 2002, I was promoted from the Flag Land Base to the International Headquarters for the Church and worked under Mr. Miscavige on Ideal Organizations.

11. I participated in the planning and organizational openings of new Ideal Organizations, beginning in 2002 with Tampa and later extending to Johannesburg, South Africa; Buffalo, New York; San Francisco, California; New York, New York; London, England and recently, in Dallas, Texas. I worked directly with Mr. Miscavige at each of these events and thereafter on the establishment of the organizations themselves...

12. I have been present at Church Management meetings from 2002 to 2009 wherein Mr. Miscavige spoke to myself and my peers to lay down the goals and strategies, for the religion. These include: the buildings of these new Ideal Organizations, the establishment of new Continental Liaison Offices to house Continental Church Management; the acquisition and establishment of new Advanced Organizations to service whole continents, Church materials translation projects that have been ongoing now resulting in the materials of Scientology and Dianetics being translated in not only 15 languages, but now beginning [books] in 50 languages, Publication Organizations rebuilt and now functioning as the largest worldwide digital manufacturing plants, as church staffed production facilities known as Bridge and New Era, the fourth dynamic salvage campaigns extending across 140 nations, the full chronological developmental recovery of the scriptures and restoration of the originals of Dianetics and Scientology Materials, releasing millions of words and writings and recorded lectures, the establishment of international centers for drug rehabilitation, literacy programs for whole nations, criminal reformation; volunteer aid where disaster strikes, human rights public awareness programs and much more. I estimate the number of meetings I personally interacted with Mr. Miscavige to be over 1000.

13. The subjects of the meetings included one-on-one training, dialogue, study, diagrams and exercises on the subjects of expanding our Churches to provide Ideal Organization spaces to deliver all Scientology and Dianetics Services; architectural plans for our new Churches and designing these to meet our internal service and delivery requirements; providing state of the art informational displays and audio visual multi-media systems throughout the Church, providing new advanced training and instructional audio visual

mediums; delivery of Church services; implementation of new pay systems for Class V organization members; implementation of staff enhancement programs and improved living standards; study and staff training programs; plans for the standardization instruction of all Church staff, members in their duties; Church management space planning to manage new Ideal Organizations, international events to brief the Church parishioners on the expansion plans and accomplishments obtained thus far; fundraising strategies to purchase new Ideal Org buildings; planning for new Advanced Organizations and Continental Organizations; planning for International Training Org formation and staff executive training programs—to name only a few subjects.

15. Through the above interaction, I have been in the presence of or in communication with Mr. Miscavige on a routine basis regarding organizational and expansion plans and have been rarely absent from International Church Management meetings, excepting those times when I have been out in local Churches (and during which times maintained frequent communication with Mr. Miscavige).

16. Mr. Miscavige has spent hundreds of hours personally meeting with me and others to train us through extensive study and personal apprenticeship. As L. Ron Hubbard's works are all in writing or recorded format, the training we engaged in was intensive study and apprenticeship on senior management policy and Church organization to better deliver Church services. In another Church, one would liken this to personal training and apprenticeship by the Pope himself. Through this, I have gained an unparalleled understanding and ability to run staff training programs for all of the new Churches we are opening around the world. It is this kind of personal care that Mr. Miscavige has extended to not only people like myself, but multitudes of others.

17. ...It goes without saying that he is the most compassionate person I know and has personally helped me far beyond what anyone would expect from someone who is the leader of a religion where time in a day is short and schedules are booked solid for months in advance. One such example is that after I fell and broke my leg, Mr. Miscavige personally ensured I had the best doctor and care to improve my recovery. I have seen him take personal care of and interest of many, not only myself, but *any* staff member in need of visible medical care or auditing, and he has ensured help was given.

18. I have seen Mr. Miscavige extend unparalleled care to individuals throughout the Church staff and parishioners alike. For example, in almost every continent where there are central headquarters for Church operations, I have seen Mr. Miscavige personally not only inspect the quality of staff standards, but also arrange for the design and rebuilding of all staff housing and dining facilities so that the staff have the best working environment, like none other seen. I have seen him demand the best working conditions for dedicated members of the church and see to all of their medical, training and counseling needs – more than anyone would ever expect the leader of a religion to even have time to think about! I have seen him write programs to accomplish this so that the staff members of our churches are taken care of and supported.

19. I have seen him personally help hundreds of people individually one on one with their troubles, and at the same time launch new Church programs to help hundreds of thousands through the strategies laid out above.

20. I first met Marty Rathbun in 1998 with Mike Rinder and both worked in the office next door to mine for four years, until 2002. I never conversed with Marty as he was not conversant. After four years of interacting, with him walking through my office by necessity to get to the coffee room, he never once said more than a typical hello to me. I approached Marty in his office one time to discuss some Flag Land Base expansion plans and gain his interest. This was the last time I approached him as he offered no interest and said he was too busy.

21. It was throughout this four-year period when the FLB Expansion Plans were launched under the direction of Mr. David Miscavige. Despite hundreds of meetings directly with Mr. Miscavige on Flag Land Base expansion plans, Marty Rathbun was never involved in one of these, even though he was located in an office next door to mine for four years.

22. I witnessed Marty Rathbun physically attack Mike Rinder several times in the office next door to mine. Mike's desk was adjacent to the wall where my desk was, so each time Marty body slammed Mike against the wall, the penetration through the wall was such that I feared the wall was going to come down on me while sitting at my desk. The ceiling tiles shook and the dust came flying down. I once ran to the next room and Mike was slumped over his chair in pain. At one point I had to remove other staff from the hallway area to prevent their fighting spreading around. Shortly after the above occurred, Mike

Rinder needed to receive counseling and I saw him being counseled in the auditing room 5 doors down from my office, to help him recover from the fear and pain Marty instilled. These physical altercations created wall damage in Mike's and Marty's office.

23. My next dealing with Marty Rathbun was in late 2003. He confided in me personally in his office located in California, at the end of 2003, a few months before his removal from RTC. He and I were in his office and he was quite upset and broke down into tears telling me that he had been involved in only legal matters for the Church his whole life and was very destructive during his tenure. He explained that he would not be able to hold a new position as he could not create things, his only experience was fighting and harming others. He explained that he was a squirrel and had grooved in a horrible pattern of ethics investigations used on staff members, stating that he had made it seem like it was Mr. Miscavige who was training him to do it. He said he didn't know how to do things standardly, was a squirrel and was a complete failure as a staff member of the Church. He continued to cry and told me he thought he was really crazy and didn't know what to do in terms of a post within the Church. He explained his repeated crazy desire to hold a legal post in the Church only so as to maintain his fighter position. However, Marty stated that he knew that no position existed as all legal positions were abolished by settling ongoing matters and all Church executives were moving onto Church expansion. Marty Rathbun further explained to me that he felt out of place in the Church structure as he had never worked on Church expansion matters, only in the legal department.

24. I have known Mike Rinder since 1998 as he sat in an office next to mine in Clearwater, Florida, until 2002. Mike also walked through my office every day by necessity to get to the coffee room. Mike only ever said hello and was not interested in any Flag Land Base Expansion programs. I once asked for his assistance during the four years I sat in an office next door to his and he glumly gave it, never to offer it again.

25. I later interacted with Mike Rinder when I moved to California in 2003 and operated as a superior to him, a junior and a peer. While occupying the same office as Mike, I had to wake up Mike from sleeping on the job at least 2 times per week—he would often sleep at his desk. I personally know of nothing that Mike accomplished since I have known him, except for creating bad press for the Church as the ex-spokesperson and legal affairs director. I have seen

Mike accomplish the exact opposite and pull the leader of our religion into handling legal matters, which Mike Rinder stated to me that he liked doing as a way to handle the fact that he was incompetent. Mike agreed with me openly that his behavior was destructive to Church expansion. Mike told me this was his way of handling his incompetence—it was better to pull Mr. Miscavige into handling his job as he was incompetent. Mike never handled one church legal case properly himself by his own admission and when he did take action, it was to the detriment of the Church.

26. Mike's reputation in the Church was one of arrogance, disdain and condescending relations. I personally abhorred working with Mike as he could not be worked "with." My experiences do not stand alone however as any others I know of who dealt with Mike Rinder found him uncaring, unproductive, lazy and most of all—unhelpful when it came to Church operations and expansion as he simply did not care.

27. Another specific is when I asked for Mike to assist in the legal papers for acquiring new Church buildings, Mike did not assist as he didn't have time. This would have greatly contributed to Church expansion, however Mike had no such desire to be part of this and refused to help me.

28. Mike stated to me in 2005 what an awful and hard time he had in dealing with any media, and touted this hardship as something none of his lowly peers (everyone else at the Int base who didn't work on media relations was considered a lowly peer) would ever have to experience and used the behavior of media and newspaper columnists to excuse his failings. He has openly stated to me that he didn't care about anything anyways, so "whatever."

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31. I have known Tom DeVocht since 1989. I worked with him throughout this time and extensively at the Flag Land Base up until 2000. I worked with him later in 2003 and 2004 up until he left. I sat in the same office as Tom for at least 4 years. Tom's allegations are categorically denied as lies and he knows it. He is doing exactly what he saw ex-Church members doing to make money by making up pure lies to gain attention and earn his 15 minutes of fame. Tom, Mike and Marty all know what they are doing. They are doing what ex-members do.

32. My experience with these allegations for the last 21 years of being part of Church Management is such that only a lunatic madman would attempt to lie and create vicious statements of utter falsity about the only person who has carried the weight to bring our religion to where we stand today. Every statement and allegation is not only categorically and utterly denied as false based on my personal observation and accounts (I was there), these allegations serve to show the levels that spiteful individuals will stoop in concocting the most outrageous lies I have ever heard of just to gain fame and make their quick buck.

33. Mike Rinder's affidavit of 1999, which details his experience and education by scholarly religious studies on the lengths that ex-members and apostates will go, to vehemently concoct outright lies for evil vendettas, describe these allegations beautifully.

Executed this 28<sup>th</sup> day of July 2009.

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