

## DECLARATION

I...hereby declare and state as follows:

1. I am over 21 years of age, 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.
2. I have been a volunteer staff member of various Churches of Scientology since 1968. I have been a volunteer staff member of Church of Scientology International since 1981. I have been in my present position since 1994.
3. I have worked with Chairman of the Board of Religious Technology Center, Mr. David Miscavige. The first time I met Mr. Miscavige was in 1979 in Clearwater, Florida where we were both on staff at the Church of Scientology there. Over the next thirty-years, I variously met with Mr. Miscavige or had the occasion to see him in person, more than a hundred times in meetings concerning external situations....
4. I have been to the Church facility located at Golden Era Productions, in Gilman Hot Springs, California, numerous times over a period of 25 years...
5. Mr. Miscavige has also seen me at my offices in the Church of Scientology International in Los Angeles and he has shown the same interest... he personally took time from his busy schedule to inspect a new media monitoring office that was being set up in my department. While not a function that the leader of our religion would be called upon to perform, Mr. Miscavige personally provided guidance and direction from his years of experience overseeing the production of religious instructional films produced by the Church and he gave very good suggestions to my staff on how the office should be arranged.
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8. I have known Michael (Mike) Rinder since 1976, having first met him in Clearwater, Florida where we were both on Church staff with various duties in the Sea Org. Since 1984, I personally and directly worked with him in various capacities....
9. Per my observation, Rinder was not helpful to the staff and in fact harassed them and "called them out" in front of others and/or ignored them completely. He was not the man you went to for help or assistance and he was not approachable.

His actions were completely contrary to the way that Mr. Miscavige operated. I know that I never went to Rinder for help or assistance as I knew he would not give it to me.

10. ...Rinder was abusive and violent towards me... Rinder stormed in... and went into a rage. He would not listen...Rinder was furious and at that point—and without any provocation or verbal warning—he placed both his hands on an 8" x 11" wooden clipboard he was carrying, did a half turn, swung and hit me on the side of my face with the clipboard, using the full force of his body. Rinder is much bigger than I am. I am 5' 2" and at that time weighed about 120 pounds and Rinder was probably about 5' 10" and 175 pounds. I was completely shocked by his actions.

...

12. Within a year of Rinder's assault on me, I developed a severe toothache. The pain became quite excruciating and I went to the dentist who took an x-ray of the tooth (a back molar) and found that it had been cracked and had to be removed. Rinder's assault on me with the clipboard was the only injury that could account for the cracked tooth.

I declare under the pains and penalties of perjury that the foregoing is true and correct.

Date: 28 July 2010

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