

## DECLARATION

I...hereby declare and state as follows:

1. I am 61 years old, 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 on Church of Scientology staff since February 1969, when I joined the New York Church, and where I was full time staff until September 1970, when I joined the Sea Organization.

3. In late 1971, I went to the flagship *Apollo* where I worked until late 1975 when the Flag Land Base (FLB) was established in Clearwater, Florida. I then held a senior finance position at the FLB from 1975 until 1980.

4. I first met David Miscavige briefly at the FLB at the end of the 1970s or early 1980s. He was a young messenger for L. Ron Hubbard who had been in Scientology most of his life and seemed enthusiastic and raring to go to make a difference in the Sea Org. I have had the good fortune to work in Mr. Miscavige's vicinity for much of the subsequent 30 years, as detailed below, and to observe how he handles himself and deals with others...I preferred having Mr. Miscavige in my vicinity because he was completely oriented to, and predictably forwarded, the expansion of Scientology in his actions and fair in his handling of others. In my experience it was provably safer, more secure and more productive to have Mr. Miscavige in my vicinity. ... For example, for over half a decade, while I was an executive to over 500 staff working directly on audio visual products of concern to Mr. Miscavige...there were, as detailed below, countless actions fully calculated to make these staff and myself successful at what we were working on.

5. In early 1982, I was promoted and worked for several months as a senior finance executive at International Headquarters. At the time, Mr. Miscavige was acting as a senior messenger to Mr. Hubbard. He was someone who clearly commanded respect from everyone at my echelon of activity. He had graduated to a far, far higher level of responsibility and competence than when I had first met him at the FLB.

6. To have risen so high in the Church in such a short period of time said it all. He plainly was a capable and responsible executive by anyone's measure. Even though he was only in his early 20's, he was already in the thick of the most important activities of Scientology on a minute-by-minute basis...

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9. I had the good fortune of working on the *Apollo* in Mr. Hubbard's vicinity for four years and to have been the recipient of very fair treatment at his hand. It was there I learned that *What Is Greatness* was not just an article he wrote, it was the way he lived his life.

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13. I was personally directed by Mr. Miscavige... on the successful execution of those programs. Every important plan and every completed audio visual product during this period was either personally directed or reviewed by Mr. Miscavige. During that period, I would estimate I went with Mr. Miscavige on over 500 inspections through the divisions, production lines and construction sites of Golden Era Productions.

14. I learned a lot about being an executive, about what it takes to accomplish the LRH quality standard (that of a product capable of inducing audience admiration and respect which swiftly forwards the dissemination of Dianetics and Scientology), and I learned Mr. Miscavige would not deviate from that standard no matter the invitation or provocation.

15. If one were to count up the number of products and the time Mr. Miscavige spent working to establish the organization, the people, the production lines, the expertise necessary to uniformly meet that quality standard on all audio visual products, it amounts to a staggering quantity if you just consider the most noticeable, major products such as: 6 international events produced every year, over 3,000 LRH lectures mixed, all religious training films shot, post-produced and released, all music and music albums scored, recorded, and mixed, all lectures manufactured on cassette. Underlying that are such things as the music scoring, recording and mixing lines and equipment and personnel and the studio itself. Mr. Miscavige guided and oversaw the planning, the construction and implementation of each part of this, so that high quality music could be produced. Then he ensured the personnel got proper training and apprenticeship, and that high quality of music was produced while this upgrade was occurring. I state this as one example of one area of the entire organization, to give some idea of the depth of involvement Mr. Miscavige had in production to forward the expansion of Scientology.

16. As the top executive of the religion, it was clear to me that Mr. Miscavige was in a league of his own in terms of competence in all of these areas. What he didn't know, he found out. What he needed to get, he got. He maintained a quality that met the requisite standards throughout, and his actions were unquestionably the reason why Scientology currently is experiencing exponential

expansion. That expansion didn't just happen overnight, and it did not happen by accident. The groundwork for that expansion was laid by Mr. Miscavige starting long ago, and he lent his expertise to every step of its implementation.

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23. Mr. Miscavige spent literally hundreds of hours briefing me and my fellow managers and working with us on situations which needed to be resolved and possible handlings for them and provided us with data we would not otherwise have had regarding them. He worked very hard to attempt to make myself and those around me successful.

24. In recent years, Mr. Miscavige's actions have taken the Church to unprecedented levels of expansion, public exposure and popularity.

26. I concluded 26 years ago that Mr. Miscavige intended to forward Mr. Hubbard's intentions in every way and no occurrence in the subsequent 26 years has done anything but strengthen that conclusion.

27. My point is, even a blind man could easily see that this man, Mr. David Miscavige, has consistently, for decades, shouldered more than his share of responsibility to make this a better world for all of us. He has confronted and resolved every balk and stop along that line. And he has done so with the dignity and fairness described by L. Ron Hubbard in *What Is Greatness*.

28. There is no comparison possible between Mr. Miscavige and Marty Rathbun as they are at opposite ends of any scale of responsibility or effectiveness. Following are my experiences with Rathbun which bear this out.

29. I met Rathbun briefly in the early 1980's when passing through an external communications relay unit he was working in. I then did not meet him again until the 1990's and did not have any significant post dealings with him until 1999.

30. Unlike other Base staff and execs, and very unlike Mr. Miscavige, who is outgoing and social, Rathbun was always distant in the dealings he did have with me...

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36. The truth is Rathbun used ...false innuendo and representations about Mr. Miscavige's intentions to take actions which violated very basic Scientology ethics and justice principles.

37. ...When I started resisting Rathbun's influence on my post, this upset him. He couldn't take it out on me physically as I was bigger than he was, but he took the opportunity of my receiving an interview from another staff member, to burst in and try to push me around while I was sitting down.

38. This outburst was completely contrary to Scientology Codes of behavior and action, but he acted as if it was my fault for forcing him to become so angry...

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43. Rathbun was an imposter using his own misrepresentations of L. Ron Hubbard and Mr. Miscavige to pass off his violations of Scientology religious technology and his administrative misapplications.

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56. These individuals—Rathbun, DeVocht and Scobee—were all clearly acting at variance with the moral codes of the group of which they were a part and were unconcerned about the destructiveness of their actions. Mr. Miscavige, on the other hand, has always worked for the benefit and expansion of Scientology and its members.

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

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

/s/  

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