

## DECLARATION

I... depose and state the following:

1. I am over the age of 18 years, and I have personal knowledge of the facts set forth in this Declaration. If I were called as a witness, I could and would competently testify to the following facts:

2. I worked for Mr. David Miscavige starting in 1987 when he became the Chairman of the Board of Religious Technology Center. Through my tenure under Mr. Miscavige's leadership I have known him both personally and as his direct subordinate. During the entire time from 1987 to now, both on a personal and professional level...I have only known Mr. Miscavige to be compassionate about the well being of others—so much so that it is one of the hallmarks of his leadership.

3. I have been a Scientologist my entire life. I have been in the Sea Org for 25 years....

5. I knew Marty Rathbun, Mike Rinder and Tom DeVocht. I vaguely knew Amy Scobee, but she never—and I mean never—played any significant role in anything that was important. In fact, the only reason I knew of her was reports... of her chronic promiscuity.

...

7. Mike Rinder and Marty Rathbun were and are the most disliked men at the International base. Both are arrogant men, who treated others above or below them with contempt and disdain, and who used and manipulated others for their own benefit.

...

14. Rathbun's bizarre behavior was often manifested in meetings where he would suddenly start breaking pencils and grinding his teeth. He did this at least forty times during the time period between 2001 and 2003.

...

15. Rathbun never really worked for the good of Scientology. He falsified training records and his actions were more consistent with an intent to harm rather than an intent to help. In fact, I know of no one that he helped. I know of no one that benefited from his association. An example, which I will never forget, is when a staff member stumbled and fell down some stairs nearby where we were standing and obviously was hurt. It was definitely not Marty Rathbun who ran over to assist the person, it was another person and me, while Rathbun acted with disdain and was offended that he had been interrupted. Scientologists have one very key thing in common and that is the purpose to help. Especially since we have the technology to help others it is a given you help anyone anywhere at anytime. It is also well known that when a suppressive person sees others helping others, they cannot restrain their disdain and feel compelled to attack—that is Marty Rathbun.

16. In March 2002, I was technically senior to Rathbun and ordered him to show me evidence of his ability to deliver Scientology procedures, as I had not up to this point seen him do so. What he turned in was hellacious. He mixed procedures, omitted procedures and ran squirrel processes. His handwriting was impossible to read. He epitomized the very concept of the gross actions one NEVER does, the horrifying examples of a squirrel. I wrote a stringent corrective program for him to do. And when I demanded he now provide evidence he was delivering pure Scientology to verify he was now straight, he promptly got rid of any means to do so under some pretense that it couldn't be done.

...

19. Rathbun was never in a technical ecclesiastical position in charge of technical matters and he was also never involved in any technical programs. In fact, the entire time I knew him, he was never involved in conceptualizing or implementing *any* expansion or dissemination program either. I know because I worked in the same organization and offices that he did both in Clearwater and at the International Base.

20. Countless times, sitting in the same office as Marty Rathbun, I heard Mr. Miscavige address him on ending the last dregs of legal matters rapidly and to get going with the real activities of expansion. Mr. Miscavige would brief us on his plans and ideas and these were always to do with technical, dissemination and expansion of Scientology. Marty Rathbun would hear of all these incredible

technical and dissemination plans and turn his back and continue making sure legal situations dragged on forever and inevitably pull Mr. Miscavige in to put an end to them. A prime example I witnessed is the very beginning of 1999 when, due to Marty Rathbun's severe negligence and inept handling, he pulled Mr. Miscavige off onto handling the legal case in Clearwater. Mr. Miscavige spent all of 1999 and again large portions of 2000 through to 2003 in Clearwater on this, not to mention having to also put on hold many major international events each of those years, all of which were associated with dissemination and expansion campaigns and properties.

21. Rathbun himself announced publicly his opposition to Scientology expansion and the well being of others. Marty Rathbun wrote this public announcement of his own accord on 28 September 2003: I witnessed his signature on the document. He wrote:

*28 September 2003*

*“Marty Rathbun - Step B - Public Announcement (ref: HCO PL SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS)*

*“I am writing this public announcement to inform executives and staff that I have come to my senses and I am no longer committing present time overts and have ceased all attacks and suppressions on Scientology. I am applying Steps A-E of HCO PL Suppressive Acts Suppression of Scientology and Scientologists because my continuous actions over the past two decades have suppressed Scientology dissemination and the purposes of this base. It has been carefully masked by a façade of being important or working on important things. It is all the more insidious because that “importance” has been by association with COB.*

...

*“I instigated a pattern of operation that is 180 degrees opposite to the purpose of orgs, this base, and ethics and justice. By enforcing parts of this pattern on others by order or example, I have driven in the following pattern:*

*Hear of a bugged production area. Bypass all seniors and base HCOs, and find a target...Interrogate the individual for personal out ethics and bad intentions.*

*Write up a report...that contains lurid details, making the target out to be an incorrigible threat.*

*Write it in such a way that some senior or [personnel officer] feels compelled to take the target off post or tell the person myself he is busted. Write the report in such a way to justify my existence by proving the base is dangerous and requires my “services.”*

*Do nothing to get the target replaced. Do nothing to get out the product that the target was not getting produced.*

...

*“The end result is unmocked org form, overworked and enturbulated executives and staff, bad news about the intentions and activities of staff members, lowering production and morale; and the creation of “threats” to justify my own existence and suppressive operating basis.*

*“This suppressive operating basis was employed to try to maintain the false impression that I have some other production record externally that warrants me maintaining a high position. In fact, this is a fraud I have perpetrated. On external lines my operation is the same—it consists of the [suppressive] characteristic of only restimulating and never destimulating. That is, when there is a threatening situation or suit, I get the [external affairs] staff and attorneys wound up toward “destroying the threat.” This has resulted in some very expensive situations becoming much bigger than they were (specifically the Wollersheim case and RICO cases) and winding up on COB’s plate to terminatedly handle. Each and every time on major situations, COB has had to intervene to clean up wars I had exacerbated. For example, left to my own devices in handling IRS litigation, the end result would undoubtedly have been no exemption, a billion dollar tax bill, and possible shutting down of the Church. I have developed a slick false PR technique of positioning myself as having been integral in handling threats during and after the fact, when they are actually terminatedly handled by COB. By calculation I have lost the Church 43 million dollars on losses and expenses that could have been avoided.*

*“By perpetuating these operations internally and externally, the worst suppression has been visited upon COB RTC. It is the worst suppression because COB RTC is the person who has single-handedly salvaged Scientology from potential external ruin, and single-handedly salvaged Scientology itself by holding the line technically, administratively, and on dissemination. Had he not been here and done what he has, Scientology would have been lost. There is no slightest doubt about that. The cumulative amount of COB’s time I have cost in terms of dropping balls, creating situations internally and externally, is on the order of eight years. If that time were recouped, there is no doubt we would have at least double to triple the amount of orgs,...we’d have thousands of missions, Scientology would be so big not a dime would have to be diverted to defense because no one would dream of fooling with it, and we would be very well on the way to a clear planet.*

*“The motivations for these acts are a psychotic computation for self-preservation: keep enough chaos and threat stirred up in the environment, make myself appear to be a solution to it instead of the instigator of it, and lots of people go down and remain in turmoil while I go unrecognized as the source of it and survive.*

*“I recognize my actions have been unfounded and ignorant and destructive in the extreme. There is no conspiracy connected with this pattern of suppression, except a portion of it. That is Mike Rinder who has gone into tacit agreement with me on making nothing of situations, false reporting on them, and allowing them to expand until they explode on COB’s plate to handle. The rest of the operation described in this announcement is an individuated and psychotic activity. I know of no one who agrees with it or condones it, or who participated in some part of it except by having been sufficiently electrified or intimidated by me to act reactively or to think it was somehow pro-survival for the group...”*

*(signed by) Marty Rathbun.*

*Witnessed by: ...*

22. Mr. Miscavige arrived back to the International Base at the very end of December 2003. On his return, he immediately recognized the havoc Marty Rathbun was creating and within days Mr. Miscavige removed Rathbun from any position where he could harm others and Scientology.

23. In January 2004 I witnessed Rathbun straddling Mike Rinder on the floor, choking him. Several big men had to drag him off Rinder who was going blue in the face.

24. Within a month, in February 2004, Rathbun...deserted the Sea Organization and his wife.

25. He is now engaged in a vicious vendetta, as he well knows the Church is doing exceptionally well since he left... Rathbun is screaming just as L. Ron Hubbard says squirrels will do, because Scientology is flourishing and prospering.

26. Mr. Miscavige's care and attention to staff and public on an individual basis is unparalleled. From my first year of working under him, he directed me to see to it that staff moved up the Scientology Bridge and those in need of assistance were given it. The most recent example included him wanting a staff member... be spiritually assisted by Scientology (the role I had) and helped medically by the very best doctors and the result is that person as of 2009, has totally recovered.

...

32. Mr. Miscavige...is a man who has dedicated his entire life to helping others. For what gain does he do this? For the gain of keeping Scientology working, for the gain of Scientology so firmly established, so thoroughly disseminated, that Dianetics and Scientology will forever be available to everyone here and now and for eternity. Mr. Miscavige is our religious leader and I would *not* change that for anything.

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

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

/s/  
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