

DECLARATION

I... hereby declare and state as follows:

1. I am over 18 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 a Scientologist for forty years and have been in the Sea Organization for the past thirty-seven years serving much of that time as an executive in the hierarchy of the Church of Scientology.

...

6. I have witnessed over the years different individuals who placed their own personal interests over that of the Church's survival and expansion. I have seen this type of character come and go over the years. They were usually discovered and expelled or when about to be found out about they ran away and deserted the Church...

7. I personally worked with Mr. L. Ron Hubbard aboard the Flagship *Apollo* in the 1970s and my relationship and experience in working for him reaffirmed my dedication to the Scientology religion. I knew him on both a personal and an organizational level and witnessed his sincere dedication to the religion of Scientology and to Mankind. He lived Scientology in everything he did. Having witnessed this, I decided my life's work would be forwarding the Scientology religion for the sake of Mankind's future survival. I have no doubt of the validity and workability of Scientology as I experience it personally and also have counseled hundreds of others throughout my many years as a Scientology auditor...

8. I worked with Mr. Miscavige for approximately twenty years. I also knew and worked with Mark Rathbun and Mike Rinder for the same time period and therefore have witnessed much concerning each person.

9. I first began working with David Miscavige in 1984...I worked under him at the Religious Technology Center (RTC). For about twenty-five years I worked by his side, attending countless meetings, traveling many thousands of miles with him and sharing whatever free time we had...I saw almost his every activity, anyone who met with him—I witnessed his life and his work.

10. I have known and worked with Mark Rathbun for over twenty years. I was his senior when he was in RTC. He was unpredictable and erratic in his behavior...

11. I have known Mike Rinder since the early 1970s...

12. Throughout the 1987 – 1993 time period, I have witnessed Mr. Miscavige almost single-handedly carry the ultimate responsibility of protecting and expanding the Church and the Scientology religion. I witnessed hundreds of times, Mr. Miscavige working with many executives and staff in all aspects and at all levels of the Scientology structure, from the very top to the very bottom, in helping, assisting and working with anyone and everyone to do their jobs better...

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14. Mr. Miscavige, in my presence, advised Rathbun on many occasions to end or negotiate settlement of all legal cases. Rathbun ignored this advice and through his ingenuity would prolong and exacerbate legal situations... Rathbun loved to fight; he loved war. That was his life style. I can't count the number of times that Mr. Miscavige told him to knock it off and get off his warlike mentality.

15. In October 1993 when Mr. Miscavige declared the "War was Over!" with the IRS and ordered the end to all legal cases... Unexpectedly, Rathbun deserted, leaving his wife and the Church. Mr. Miscavige was very concerned that something might have happened to him.

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16. Rathbun eventually called and asked for some assistance as he, in his words—"lost it..." Mr. Miscavige granted Rathbun a two-year sabbatical so he could get back on his feet and so I spent two years of my life with him there—to help and care for him! The compassion given Rathbun by Mr. Miscavige was enormous...

17. Rathbun and I berthed together aboard the *Freewinds* for those two years. We did just about everything together. Rathbun expressed to me many times, during our stay on the *Freewinds*, his appreciation of Mr. Miscavige's help...

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22. During the 2003 time period, Rathbun and Rinder were off and on at the international base. Coincident with their appearance there were reported incidents of them taunting and antagonizing different executives and staff. These were sporadic incidents...

23. ...Rathbun was removed from all legal affair lines and stripped of any authority and position by Mr. Miscavige... Rathbun returned to the base in disgrace. It was not long after this that Rathbun originated a confession of what he had been up to and the destructive actions that he had committed in losing legal cases and also in harming staff and executives on the base.

...

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