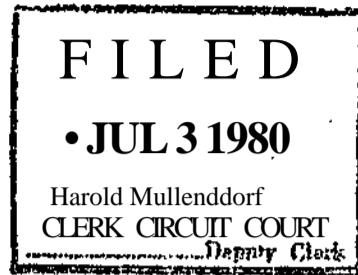


IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PINELLAS COUNTY

IN RE

PROCEEDINGS TO COMPEL THE
ATTENDANCE OF MERRELL VANNIER
AS A WITNESS BEFORE THE GRAND
JURY OF PINELLAS COUNTY, "
FLORIDA



AFFIDAVIT

DENIS J. QUILLIGAN being duly sworn deposes and says:

1. That he is the Chief Investigator for the Office of JAMES T. RUSSELL, State Attorney of the Sixth Judicial Circuit of Florida. The Sixth Circuit encompasses both Pinellas County and the cities of St. Petersburg and Clearwater, Florida.

2. As Chief Investigator, he is a law enforcement officer of the State of Florida and has been involved in a continuing investigation by the State Attorney's Office into certain criminal activities occurring within Pinellas County, Florida. The scope of the investigation includes inquiry into the actions of an organization known as the Church of Scientology (which maintains one of its primary national offices in Clearwater, Florida) and the actions of its members. (hereinafter referred to as the Church for the purpose of convenience).

3; Review of publicly released documents seized by the United States Government in 1977 pursuant to a Search Warrant issued for the Church's California Offices has made your Affiant aware of repeated plans by Church-officials to infiltrate and discredit many organizations, government offices or individuals in Pinellas County which were critical of the Church; additionally, as detailed below, these plans also included attempts to falsely accuse opponents of criminal and scandalous activities:

(a) Previously released documents indicate detailed plans by Church officials to falsely accuse a Clearwater Sun reporter with sexually assaulting a young boy. An elderly female posing as the alleged grandmother was to make a vehement accusation to the reporter's superiors; this was to be followed up by a male caller indicating the reporter would be sued and should be arrested.

(b) Released documents also revealed detailed plans to discredit a St. Petersburg Times reporter. Among other schemes, one plan was to have an undercover person, not associated with the Church's Clearwater office, pose as a "messenger boy" for certain organized crime figures and deliver an apparent bribe (\$100 in small bills in an envelope) to her place of employment.

(c) Documents also indicate plans to investigate local government offices, including the office of the State Attorney, and conduct "penetration" and "surveillance" operations. Other documents reveal that the State Attorney's Office was targeted for infiltration and make reference to doing high priority work concerning "Russell documents."

(d) Released documents also indicate plans to frame GABRIEL CAZARES, the Mayor of Clearwater, with bigamy by bribery and falsification of records. Letters were also written and distributed in Clearwater which wrongfully accused the Mayor of involvement in a hit and run accident which had been purposefully faked in Washington, D. C.

4. The involvement of the Church and Church members in criminal activity is further demonstrated by the federal prosecutions of Church members resulting from the execution of the 1977 Search Warrants. The government's investigation began when two Church members, GERALD WOLFE and MICHAEL MEISNER, were caught in the act of attempting to obtain government documents by illegally entering the United States District Courthouse in Washington, D. C. Based on information that Church records documented this and other illegal activity, Search Warrants were issued. Nine (9) Church members (MARY SUE HUBBARD, DUKE SNIDER, HENNING HEIDT, RICHARD WEIGAND, GREGORY WILLARDSON, CINDY RAYMOND, MITCHELL-HERMANN, GERALD WOLFE and SHARON THOMAS) were indicted with twenty-eight (28) criminal counts, including charges of obstructing a grand jury, obstructing FBI, conspiracy to commit burglary of a government office, conspiracy to steal government property, conspiracy to intercept private government communications, harboring and concealing a fugitive and false declaration to a Federal Grand Jury.

Based upon an uncontested stipulation of evidence, the defendants were found guilty after a non-jury trial. Defendants HUBBARD, SNIDER, HEIDI, WEIGAND, WILLARDSON, RAYMOND and WOLFE were convicted of conspiracy to obstruct justice. HERMANN was found guilty of conspiracy to burglarize government offices and steal government documents and THOMAS was found guilty of theft of government property. Cases are still pending against two additional Church members who have recently been extradited.

5. That a Grand Jury investigation into these and similar criminal activities of Scientology members within Pinellas County is about to commence'. The attendance and testimony of MERRELL VANNIER and his wife FRANCINE VANNIER, who are material and necessary witnesses to the investigation, is required for July 16, 1980.

6. That MERRELL and FRANCINE VANNIER are currently residing at 1036 South Main, Apartment E, Burbank, Los Angeles County, California.

7. That MERRELL VANNIER, who was and continues to be an active Scientology member, was involved in an attempt to infiltrate the offices of the State Attorney in July of 1976. VANNIER, who is an attorney, had applied as an Assistant State Attorney with the St. Petersburg Division of the State Attorney's Office. While his application was pending during July, VANNIER had access to St. Petersburg State Attorney's Office and was there, on a daily basis. The State Attorney's Office was unaware that he was a Scientologist. Your Affiant's investigation has indicated that the office was a restricted area and inaccessible to unauthorized personnel. Between July 12 and 13, 1976, a portable radio belonging to the State Attorney's Office worth in excess of five hundred dollars (\$500.00) was stolen from the St. Petersburg office. This radio was tuned to the same radio band which the State Attorney's Office uses for office communication. Subsequent investigation revealed no one other than VANNIER who had both a motive and the opportunity to have taken the radio.

8. . VANNIER was not hired by the State Attorney's Office but remained in the Pinellas County area. He subsequently worked for the law firm of Phillips, McFarland, Gould, Wilhelm and Wagstaff during 1977. This firm had been engaged to represent Clearwater Mayor GABRIEL CAZARES (See Paragraph 3 (d)) who had sued and was being sued by the Church of Scientology. Without informing any one of his connection to Scientology, VANNIER attempted to have CAZARES" drop the case and apologize. Copies of documents prepared by VANNIER which CAZARES refused to sign are attached.

9. That the State Attorney's Office has received information that certain documents of the State Attorney's Office are in possession of members of the Church of Scientology, including personnel, lists and prosecution strategy notes. It is known to the State Attorney's Office that pretext calls have been made to employees of the State Attorney's Office who have unlisted home telephone numbers but whose numbers are listed on personnel lists. Additionally, the source of the information stated that either oral communication interception devices have been placed within the office of the State Attorney in violation of Chapter 934, Florida Statutes, or that some individual has infiltrated the office of the State Attorney. Further, after confidential conversations held in the State Attorney's Office regarding individuals that it was felt necessary to interview, it WAS discovered that these persons had left the area although they were still in the area prior to the conversations.

10. FRANCINE VANNIER is the wife of MERRELL VANNIER and is also a necessary and material witness to the investigation. She is also an active member of the Church of Scientology and would have knowledge of the Church's involvement and activities in Pinellas County.

11. That the VANNIERS moved to Pinellas County from Missouri in 1976. • They left the area suddenly in September of 1977 and have only recently been located in California. That the activities detailed in Paragraph 3 occurred during the same general time frame that the VANNIERS were in Pinellas County.

12. During her stay in Pinellas County, FRANCINE VANNIER worked for the law firm of Baynard and McLeod that was handling a suit between the Church of Scientology and the St. Petersburg Times (Times' employees had been the object of previous activities by Church members as indicated in Paragraph 3 (b)). Confidential documents from Baynard's file concerning the suit were, later found in the possession of the Church of Scientology. Copies of these documents were seized during the execution of a Search Warrant in California in 1977.

13. That attempts to subpoena and question witnesses from the "Church's" Clearwater Headquarters concerning the whereabouts of persons or documents which would reflect the culpability or lack of culpability of Scientology members of these and other potentially criminal acts have been repeatedly obstructed and unsuccessful due to the intentional refusal and inability of such witnesses to provide useful information.

14. MERRELL and FRANCINE VANNIER have material and necessary testimony concerning these and other matters relevant to the Grand Jury investigation. Moreover, it is believed that such testimony will shed light upon and be relevant to the Grand Jury's investigation of subsequent illegal conduct of the "Church" and "Church" members.

15. Your Affiant further requests that the material witness certificate, recommend that the witnesses MERRELL and FRANCINE VANNIER be taken into custody and delivered to a member of the Pinellas County Sheriff's Department to assure their attendance in Florida before the Pinellas County Grand Jury. The basis for this request includes the following facts which have been established through your Affiant's investigation:

(a) The witnesses maintain continuing ties to the "Church" of Scientology and therefore may be reluctant and unwilling to return as witnesses in an investigation which involves the activities of the organization and its members.

(b) That the witnesses left "Pinellas County suddenly without notice and have only recently been located. Previous attempts by others to serve MERRELL VANNIER, who is a defendant in a civil suit by CAZARES, have met with no success; when deputies attempted to serve him at a previous address in Los Angeles, the occupant denied being VANNIER and denied that any one by that name lived there but refused to identify himself.

(c) That the Office of the State Attorney has been repeatedly obstructed and frustrated in its attempts to serve subpoenas on local Scientologists possessing information relevant to its investigation; employees at the three motels operated by the Church were uncooperative with investigators, refused to identify themselves, and denied knowledge of the location of Church members residing on the premises.

(d) The Church of Scientology had previously developed a detailed secret plan to assist members in avoiding being subpoenaed as a witness against the Church. This plan, known as Project Quaker, was first identified when the FBI served a Search Warrant on the Church of Scientology Headquarters in Los Angeles, California and the document was seized under that warrant. The Project is a top secret plan to insure that any Scientologists who might be subpoenaed are not available for questioning yet kept free of any prosecution for fleeing. Basically, the Project calls for potential witnesses to be moved to other areas under the pretext of sabbatical leave; also, witnesses and officials are advised to:

- (1) Have a passport, taking care that the Church of Scientology's connection is not mentioned on any passport application.

- (2) List phony occupations.

- (3) Indicate that those persons who have flown are on sabbatical leave.

- (4) Not communicate with fellow Scientologists.

- (5) Have cash available to fund these trips.


(6) Set up safe houses in out of the way places (like ski resorts, dude ranches, Canada, etc.).

(7) Alert the entire organization to the sabbatical cover story.

(8) In general, just not be available.

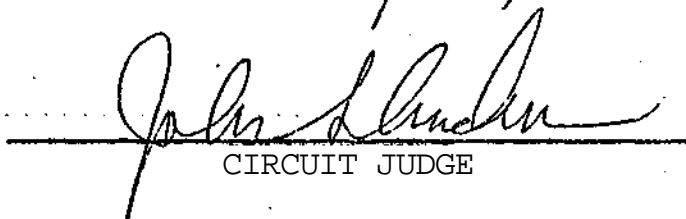
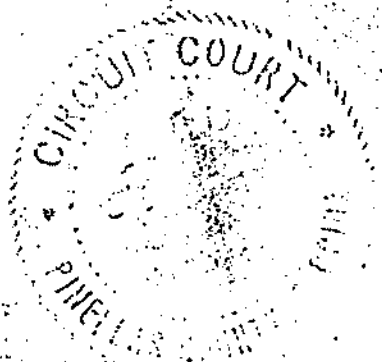
(Copies of supporting documents are attached.)

WHEREFORE, your Affiant prays that this Court issue a Certificate pursuant to Florida Statute 942.03 requesting the attendance of MERRELL VANNIER and FRANCINE VANNIER as witnesses before the Grand Jury for a period of three (3) days commencing on July 16, 1980 to be filed with the appropriate Circuit Court of Los Angeles County, California.



Denis J. Quilligan, Chief Investigator
State Attorney's Office
Sixth Judicial Circuit of Florida

Sworn to and subscribed by me this 2nd day of July, July 1980.



CIRCUIT JUDGE