

DECLARATION OF STACY YOUNG

I, Stacy Young, declare as follows:

1. I have personal knowledge of the facts stated in this declaration and if called as a witness I would be competent to testify to those facts.

2. I am a former member of the organization known as "Scientology". I joined Scientology in 1975 and I left Scientology in July of 1989.

3. During the majority of the years that I was associated with Scientology I worked in what was known as the "Guardian Office". This Guardian Office was responsible for, among other things, public relations, the oversight of all litigation and intelligence which included covert operations.¹ The Guardian Office was renamed the "Office of Special Affairs", which if I remember correctly, occurred in 1983.

4. Starting in August, 1984 I worked in the Office of Special Affairs US ("OSA US").² I was assigned to handle public relations writing and to write articles for and edit a publication known as "Freedom". The OSA US was part of the Church of Scientology of California, ("CSC").

5. The office where I worked in 1984 was in the Scientology "complex" formerly the Cedars of Lebanon Hospital.

¹ Certain covert activities of the Guardian Office led to the criminal convictions of various Scientologists including Mary Sue Hubbard, wife of the founder of Scientology, L. Ron Hubbard, for conspiracy and other substantive crimes. See, United States v. Heldt, (Fed. Cir. 1981) 668 F.2d 1238, 1242-1243, Cert. Den. 102 S.Ct. 1971. (Exhibit ___).

² There are Offices of Special Affairs on each continent. There is an International Office of Special Affairs, in Los Angeles, which manages the worldwide Offices of Special Affairs.

1 This "complex" covers an entire block in Hollywood bordered by
2 Sunset, North Berendo, Fountain Avenue, and North Catalina.

3 6. When I started working for OSA US, its office was
4 located on the third and fourth floors of a building in the
5 "complex" known as the "American Saint Hill Organization" or
6 more commonly the "ASHO" building.

7 7. It had been common knowledge within OSA US that
8 Lawrence Wollersheim, a former Scientologist, was suing CSC, and
9 that Scientology and CSC had no intention of ever paying
10 Wollersheim "one thin dime". The phrase "Not One Thin Dime for
11 Wollersheim" became a slogan for the Wollersheim case.

12 8. In early 1985 the OSA US staff was briefed at a staff
13 meeting about the "Wollersheim" case. The briefing was done by
14 the Commanding Officer of OSA US, who as I recall, was David
15 Butterworth at that time. The staff, including me, were told
16 during the briefing that it looked as though Wollersheim might
17 win his lawsuit. This would mean that the court could order the
18 corporation, CSC, to pay Wollersheim money. We all knew that
19 this was a joke because CSC would never pay Wollersheim a cent.
20 It was a matter of principal that Scientology would never pay an
21 "enemy" like Wollersheim.

22 9. At this meeting we were briefed that Scientology's
23 plan was to gut CSC of any and all assets. In this manner there
24 would be nothing for Wollersheim to seize if he won his suit.

25 10. To accomplish this "gutting" the OSA US Treasury
26 Office and the Freedom Magazine office were to be moved, and did
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1 move, out of the "complex" and into an office across the street
2 on North Catalina. The OSA US Treasury Office was going to be
3 moved because that was where the financial records were stored.
4 The Freedom magazine offices was going to be moved because it
5 was a public office and would make it look like there really was
6 a functioning corporation.

7 11. The balance of the OSA US operations were to be
8 transferred to another corporation or entity. If I recall
9 correctly these other OSA US operations became part of what was
10 known as the Church of Scientology Western United States.

11 12. To the best of my knowledge, CSC was, for all intents
12 and purposes, "gutted" of any and all assets. These assets were
13 transferred from one Scientology entity to another.

14 13. The asset transfers were for the express purpose of
15 defeating Mr. Wollersheim's chances of ever collecting any money
16 in this action.

17 14. Based upon everything I know, and everything I saw
18 while I was a member of Scientology, I believe that Scientology,
19 which is headed by what is known as the "Sea Organization" or
20 "Sea Org" transferred all of the assets out of CSC after the
21 filing of Mr. Wollersheim's lawsuit for the express purposes of
22 preventing Mr. Wollersheim from recovering any money as a result
23 of the lawsuit.

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25 I declare the foregoing to be true under the penalty of
26 perjury, except as to those matters stated upon information and
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belief, and as to those matters I believe them to be true, in accordance with the law of the State of California, this ___ of September, 1994 at Seattle, Washington.

Stacy Young