

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

THE FOUNDING CHURCH OF SCIENTOLOGY )  
OF WASHINGTON, D.C., INC., )

Plaintiff, )

v. )

DIRECTOR, FEDERAL BUREAU OF )  
INVESTIGATION, et al., )

Defendants. )

Civil Action No. 78-0107

DECLARATION OF NORMAN STARKEY

I, NORMAN F. STARKEY, declare and say:

1. I am presently Executive Director of Author Services, Inc. (ASI), a California for profit corporation which acts as the literary and business manager for Mr. L. Ron Hubbard. I have served as an executive of Author Services, Inc. since its inception in November, 1981, and I have personal knowledge of all the facts presented in this declaration.

2. I have known Mr. Hubbard personally for almost 17 years and have been a trusted associate of his for a longer period of time than any of the affiants who have submitted sworn statements in the above named action.

3. I last met with Mr. Hubbard personally sometime in late 1979. Since that time, I have not personally met with Mr. Hubbard. I am aware of the fact that in the past at his own discretion and desire, Mr. Hubbard has been able to originate a communication to those of

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his choosing.

4. In early 1981, I terminated my employment with the California Church and began to work directly for Mr. Hubbard. At that time, Mr. Hubbard was not an officer, director, or employee of the California Church. While I was paid a salary by Mr. Hubbard, I did not have any personal contact with him as I stated above. During this time, while I have not been in the employ of any Church, I have remained faithful to my chosen religious beliefs, and continue to remain an ordained Scientology minister. Since my termination as an employee of any Scientology Church, I have continued to perform marriage ceremonies and funeral ceremonies in my capacity as a Scientology minister.

5. Author Services, Inc. is a private corporation and is not in any way affiliated with any Church of Scientology, any Sea Organization unit, branch or entity. It has no authority over nor is it controlled by, any Scientology church or the Sea Organization and is not in the business of managing the Church of Scientology.

6. Just as a person who is a member of the Catholic Church, employed by a public company is still a Catholic, but not working "for the Church" so am I a Scientologist (as with many of my friends), but am not employed by, am not an officer, director or official nor an employee of any Church of Scientology. In the same manner, Author Services, Inc., the corporation, is not part of any Scientology Church and its employees, although members of the Scientology faith, are not Church of Scientology employees.

7. I am a member of the Scientology fraternal order called the Sea Organization, an order composed of devout Scientologists. As a Sea Organization member I am a devoted member of the religion and from time to time am called upon to render my services to the propagation

of this religion. Through my membership in this fraternal order, however, I am in no way associated with or employed by any Church or Church corporation. Membership in the Sea Organization is not conditioned upon employment in any Church of Scientology.

8. When I resigned from the Church of Scientology of California in early 1981, I worked with another employee of Mr. Hubbard, Terri Gamboa. Like me, Ms. Gamboa was not (and still is not) an employee of the California Church, or any other Church of Scientology, but was, at that time, in the employment of Mr. Hubbard (and is now an employee of Author Services, Inc.). Ms. Gamboa is a life-long Scientologist. Her mother had been a devoted Scientologist and a personal friend of Mr. Hubbard.

9. In late 1980, Ms. Gamboa was sent a manuscript of a book entitled "Battlefield Earth," which had been written by Mr. Hubbard. Throughout his life, Mr. Hubbard has been a prolific author. In the 1930's and 1940's, Mr. Hubbard wrote and published several hundred Science Fiction, Adventure, Western and Fantasy short stories and novels. He has been recognized as one of the greatest writers of the Golden Age of Science Fiction and has sold millions of fiction works in many different languages. This is quite apart from the huge library of religious scriptures that he has authored since early 1950.

10. Prior to his authoring of "Battlefield Earth," Mr. Hubbard had not authored works on non-Scientology subjects for a number of years. Accordingly, Mr. Hubbard requested that Ms. Gamboa and I undertake the responsibility of publishing, marketing and of establishing public relations facilities <sup>61327</sup> for his newly written book, "Battlefield Earth."

11. A publisher was found and a Public Relations firm was retained. Mr. Hubbard has subsequently sold well over 1 million copies of his "Battlefield Earth" novel and the rights have been sold to make the book into two major motion pictures.

12. Mr. Hubbard has been highly recognized by Mayors, Governors, politicians, businessmen and friends in the United States as well as countries overseas for the work he has done in the fields of writing, which includes his recent "Battlefield Earth," drug rehabilitation, education, music, arts and other fields. I have attached as Appendix A, a booklet showing the recognitions received by Mr. Hubbard in 1984 as above.

13. When Ms. Gamboa and I were asked to arrange for the publication and marketing of the "Battlefield Earth" novel, we were also requested to engage legal counsel to represent Mr. Hubbard in his business affairs, including the publication and marketing of his recently written "Battlefield Earth." Prior to engaging counsel for Mr. Hubbard, Ms. Gamboa and I became aware of certain pending litigation in which Mr. Hubbard was named as a party-defendant. Although we did not know the exact nature of this litigation, we discussed this fact, generally, with various attorneys whom we interviewed with a view toward their employment as counsel for Mr. Hubbard's business and literary affairs. In mid-April, 1981, Ms. Gamboa and I retained the law firm of Lenske, Lenske, Heller & Magasin, a law corporation, later known as Lenske, Lenske & Heller, a law corporation.

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14. In about May, 1982, Author Services, Inc., a California corporation, commenced operations toward representing Mr. Hubbard's business and literary affairs, and toward completely separating Mr.

Hubbard's personal matters from any Church of Scientology. Author Services, Inc. has maintained its offices separate from any Scientology Church entity. Author Services, Inc.'s staff are not employees or officers of the Church of Scientology of California or any Church of Scientology although they are Scientologists. Despite the attempts by parties in litigation with the Church (including several departments of the United States Government) to equate or otherwise link the Church of Scientology and Author Services, Inc. saying that they are one and the same, the facts are very clear that they are separate, unconnected entities.

15. Over the years, Mr. Hubbard has periodically secluded himself from the public, and, at times, without even informing his wife and best friends of his departure or new location, for lengthy periods of time. While I was on the staff of the Johannesburg Church in 1966, I know that Mr. Hubbard had secluded himself in Rhodesia (now Zimbabwe) for almost a year. In 1967, Mr. Hubbard left on an expedition into the Mediterranean with a few select friends without telling others of his whereabouts. In 1972, Mr. Hubbard again left without telling us where he was going, to continue his spiritual researches. He was away at that time for about 9 months.

16. In 1980, Mr. Hubbard wished to complete some spiritual research as well as author some film scripts and books. I am aware demands upon Mr. Hubbard's time from various Scientology organizations, and other persons, were making it increasingly difficult for him to engage in his research and chosen work. As a result, Mr. Hubbard determined that he would again seclude himself so as to be able to continue his writings and research uninterrupted.

17. Since Mr. Hubbard's chosen seclusion in 1980, communications to and from him have been very limited. During his seclusion Mr. Hubbard alone has originated each means of communication with a few trusted associates and has done so totally at his discretion. During some periods since early 1980, Mr. Hubbard has infrequently sent communications to his trusted friends; at other times, there would be almost weekly communications sent to them. The frequency of communication varied over the last few years. In 1980 and 1981, there were almost none. In 1982, they were more frequent. In 1983, communications slowed down until the fall of that year, and since the spring of 1984, there have been none.

18. As I have been closely associated with Mr. Hubbard's personal affairs and literary interests since 1981, I am familiar with most of the communications that have come from or have been sent to him. During the years 1980 to 1981, there were relatively few communications from Mr. Hubbard. Those that were received were mostly concerning his literary and estate planning interests and even these were known only to a select few trusted and devoted friends of Mr. Hubbard.

19. Since Mr. Hubbard's seclusion in 1980, there has not been to my knowledge a means of initiating a communication directly or indirectly to him. Mr. Hubbard has not provided anyone that I know of with a telephone number to call to contact him, nor an address where I or anyone else could send mail. When Mr. Hubbard desired to receive or send communications, he originated a method of transmitting limited communications via a series of relays and drops where communications could be exchanged through trusted friends of his. These persons received communications because of their loyalty to, and trust imposed

upon them by Mr. Hubbard and not by reason of any position which they held in the Church of Scientology.

20. Only when Mr. Hubbard initiated communication was information sent to him concerning his business, financial and literary interests as well as public relations and marketing reports. On many occasions, it could not be confirmed that Mr. Hubbard actually received all communications sent to him. Sometimes communications would be acknowledged and other times they would be unacknowledged.

21. In fact, there have been a number of communications that were never responded to and there was no way to tell if every communication had been relayed on to Mr. Hubbard. It was also impossible to send communications to Mr. Hubbard unless they were specifically asked for.

22. In March of 1983, I was informed that Mr. Hubbard would be discontinuing his limited lines of communication for the foreseeable future so as to permit him to concentrate exclusively on his Scientology research. As previously indicated, Mr. Hubbard had completely severed communications in this fashion on prior occasions. Thereafter, no communication from Mr. Hubbard was received by myself, anyone at Author Services, Inc., or anyone else that I know of, until the fall of 1983.

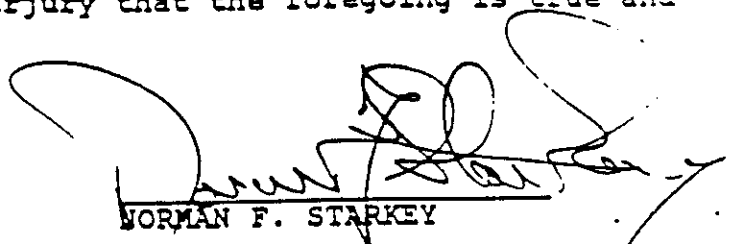
23. In the fall of 1983, at Mr. Hubbard's origination, there was again a period of communication with Mr. Hubbard. However, in about May of 1984, Mr. Hubbard again completely discontinued communication. There has been no communication with him since that time. Furthermore, no person at Author Services, Inc., including myself, has knowledge of Mr. Hubbard's whereabouts.

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24. In my capacity as Executive Director of Author Services, Inc., I can personally attest that Mr. Hubbard's present and complete seclusion makes it totally impossible to advise him of this Court's order of March 13, 1985. ASI possesses no means or method to directly or indirectly initiate a communication with Mr. Hubbard or, for that matter, any intermediary. As Mr. Hubbard has not communicated with ASI since May of 1984, no communication line exists to inform Mr. Hubbard of the Court's Order.

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

March 23rd 1985  
DATE

  
NORMAN F. STARKEY