

Exhibit

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Exhibit # 47

5/8/82

Affidavit of Stan Herron

1. Stan Herron, reside with my wife, Annette Herron, in Las Vegas, Nevada.

1. I was involved with the Church of Scientology from the summer of 1972 through 1978 (2.11.78)

2. During the time I was a member of the Church in Las Vegas, Nevada and on board L. Ron Hubbard's the leader of Scientology, ship the "Apollo", I paid more than \$13,000 to Scientology.

3. I paid this money to L. Ron Hubbard and Scientology after being told by Church members, and reading in L. Ron Hubbard's books, representations concerning L. Ron Hubbard's background and the benefits of Scientology. Some of the benefits I was promised in Scientology included a higher I.Q., faster reaction time, total recall, complete physical health and perfect thinking.

4. I was told L. Ron Hubbard researched, discovered and developed miracle cures for illnesses using the technology of Scientology. I was told L. Ron Hubbard was a nuclear physicist and had graduated from the finest institutions

in the United States, Princeton University and George Washington University. I was also told that L. Ron Hubbard was one of the most decorated heroes of World War II, was a world traveler and discoverer of far off cultures, and was able to heal himself after being "crippled and blinded" from wounds received in battle in World War II.

5. While in Scientology, I joined a force known as the "Sea Org". The Sea Org worked and carried out Hubbard's orders from aboard the ship Apollo. While on board Hubbard's ship, the Apollo, I was trained as a finance banking officer for the organization. As the finance banking officer I was familiar with the gross income of the Scientology Orgs. Orgs were required to file weekly reports to Church Headquarters and L. Ron Hubbard. At one point I was responsible for insuring at least 10% of funds from a particular Scientology Org was sent Hubbard.

6. One primary task I had while on board the Apollo, concerned accompanying George Beasley, the head "Flag" finance banking officer as a courier for L. Ron Hubbard, of huge sums of cash in bank wrapped bundles and carried in a brief case ~~from~~ ^{to (A-11) from} the ship ~~to~~ banks on shore. George Beasley told me that Hubbard had ~~secret~~ accounts in Switzerland and Africa.

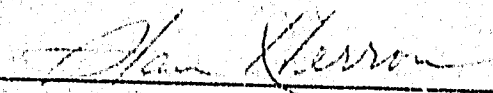
He told me the money was from funds sent to the Operation Transport Corporation and then subsequently transferred to numbered accounts in Switzerland and Africa.

7. Conditions on board the ship were extremely harsh. Sleeping quarters were dark, damp and crowded. Only 30 second showers were allowed. Worst of all, if any person disobeyed any of Hubbard's orders he was placed in the "RPF" (Rehabilitation Project Force). The Rehabilitation Project Force was Hubbard's internal prison for those Scientologists who disobeyed his orders.

8. All mail to and from the ship was censored for, I was told, "ship security." During this time I received, only a couple (A.H.) of the letters my wife sent to me. She received only one of about six I sent her. Hubbard ordered the censoring to prevent Scientologists from writing and exposing facts about L. Ron Hubbard's broken arm, colds, sicknesses, etc. is what I believe.

(S.K.)

Signed under the pains and penalties of perjury
this 27th day of April 1982.


Stan Herron

Exhibit

48

PROJECT OWLInformation:

On Feb. 26, 1976 Bsn PC John Wise accompanied by attorney John Lynch, his father and two detectives attached to the Suffolk County DA's office came to the Bsn Org demanding a refund and threatening a complaint of larceny, extortion and embezzlement against the Church.

On March 17, 1976 it was discovered that the Suffolk County DA's office is ~~thru~~ conducting an investigation of Bsn for criminal fraud.

On March 17 it was also discovered that ex. Bsn PC John Wise had been seeing psychiatrist Stanley Cath since about Feb. 16, 1976.

On March 18, 1976 it was discovered that the Suffolk County DA's office is attempting to reinstitute charges of kidnapping earlier brought and dismissed against Bsn R/O Don Marshall in the Leslie Brundige case.

Major Target:

To handle the attack being generated out of the Wise refund, cycle both with Wise and his attorney and at the Suffolk County DA's office.

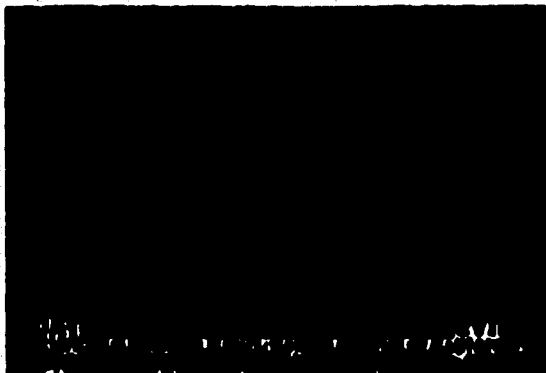
To locate the who behind the attack and handle that person.

Primary targets:

1. Responsible for carrying out and pushing through this cycle is DG I NE. (ODC's, and CDC aspects.)
2. Get needed FSM's recruited. DG I NE (2-3)
3. Form of org. Deac supervision
 - Gary B. carrying out ODC actions under Deac
 - Mathy B. carrying out CDC actions under Deac
 - 2-3 FSM's carrying out penetrations of target areas.
4. Br II DIR NE carrying out Br II actions.
5. Strong liaison established with PR, Fin, Legal for this cycle.
6. Standard H-1 report line in.
7. Purpose of getting area handled pushed hard and given proper priority.

Conditional targets:

1. Findout if our attorney Orenstein is usable or not. Keep an FSM in on him till this fully determined. If not usable ensure that new attorney who is suitable is found. (Orenstein was on org lines, type A sit and blown HSDC student from about 1971 or so. Orenstein was recently deadfired.) (Data on orenstein must be fully documented whether usable or not.) (if necessary CSW no removal.)
2. ~~XXXX~~



2. Check out the feasibility of putting an FSM in the DA's office and if feasible, do so securely.
3. Survey org staff for any internal data on Wise of use and have affidavits drawn up showing (a) that Wise was in bad shape before he got on lines and when first came in and that he got better because of Sen and (b) that any out ethics by org staff was done by an individual and not in capacity as a staff member (ex. loans, favors etc) and that staff member knows this is against policy of the chrch.
3. Review the data as it comes in and see if any further tgts to be added.
4. See if the group Return to Personal Choice is involved with the Wise cycle. (ex. is Steves a member.)
5. See to what extent Cath is involved.

Vital targets:

1. Cycles to be carried out quickly and thoroughly enough to give the needed data. High priority of cycle recognized.
2. Security to be maintained regarding FSM's including no PTS fsm's used and good covers maintained.
3. Suffolk County DA's office restrained as an attacker

Operating targets:

1. ODC and time tracks done on the following:
 - a. Stanley Cath: (f) Thomas Sawyer
 - b. Attorney John Lynch (b) Dr. O'Malley
 - c. John Wise (h) Dr. Deery
 - d. John Wise's father
 - e. Rev. Steves (referred Wise family to Cath)
2. Obtain Cath's files on: (via FSM or other means as appropriate.)
 - a. John Wise
 - b. Scientology
 - c. Others as needed (including Paulette Cooper material not previously obtained, Cliff Stanton file, Cath personal files, material on deprogramming, Mrs. Elaine Lieberman, Ben Roeschman, International Foundation for Individual Freedom (IFIP), Return to Personal Choice, Dr. Taylor and Ted Patrick.)
3. Do CDC on Cath for data on his book, fish for leads that Cath knows Wise and/or Stanton, use Cath to establish lines into other areas for CDC's
4. Obtain Attorney John Lynch's files (via FSM possibly working on: Wise cycle in bldg as cleaner or security guard)
 - Personal files
 - Financial data (his)
 - Scientology
 - DA's office
5. Have Br II interview org staff for data on Wise and affidavit as per CT 3.
6. Hat FSM to keep an eye on Orenstein to ensure that he is playing by the book with us. (FSM already placed.)
7. Liaison with Finance to ensure refund paid as quickly as possible (return of AP)
8. Liaison with legal to ensure that suit is brought against Lynch for attempted extortion and that disbarment proceedings

- are instituted.
9. Do ODC and CDC as needed on Suffolk County DA's office to provide incident material of use to PR to attack the office.
 10. Find Lynch's lines into the DA's office and expose or cut them.
 11. Review data for more strings to pull.
 12. Review data and determine the who for the cycle
 13. Submit CSW for ops to handle.
 14. Ensure that Don Marshall is handled on 2r II lines so that no further flaps come out of his area. he had mishandled both the Wise refund and the Brundige refund cycles. Brundige refund cycle resulted in his being arrested for kidnapping and assault and battery.
 15. Ensure that the Brundige cycle is not usable by Lynch and DA's office as a means of broadening their attack on the church. (Get refund and waiver cycle completed, if Brundige not willing to do this work out good ops handling on Brundige and submit it to US for approval.)

Production targets:

- OT's 1,3,5,6,7,8,9,10 done in one week.
OT's 2,4,11 done in 4 weeks at the outside
OT 12,13 done one week after the above
OT 14 done within 2 weeks
OT 15 done within 2 weeks.

The above project is to be used by DG I NE to operate off of on temporary basis until the handling is approved at US for permanent OK.

Mike Cooper
NE Msn 1/c

United States District Court
for the District of Columbia
A TRUE COPY

JAMES F. DAVEY, CLERK

By *William Allen*
Deputy Clerk

Exhibit

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OPERATION BREAKOUT

1 April 1976

MAJOT TARGET:

To get P.O incarcerated in a mental institution or jail, or at least to hit her so hard that she drops her attacks.

PRIMARY TARGETS:

US BI NE SEC working in liaison with OPS NAT *if needed.*

To remove PO from her position of Power so that she cannot attack the the C of S.

US BI ^{NE} SEC Taking responsibility for the area working in liaison with OPS NAT.

Ops NAT responsible for the overall planning of this project, working in liaison with NE SEC *as needed for completion successfully of this of*

OPS NAT responsible for any debugging of this project, necessary.

NE SEC and AG I NY organization operating with INFO *plus pushing T&T THROUGH to completion.*

VITAL TARGETS:

1) To recruit an PSM that looks like PO and to train her on this action. *AG IN.Y.*

2) To recruit an observation PSM to make a telephone call. No special requirements necessary except security *AG IN.Y.*

3) To get "Pin Ball" PSMs or T.M. PSM to get familiar with PO to find out some of her clothes she wears particularly what sort of coat she usually wears and her general looks, hair etc. Also above PSM or PSM will have to meet with PO when the OP goes down - *if possible, to get a piece of PO's clothing AG IN.Y.*

4) To get a cheap coat that is very similar to PO's. *AG IN.Y.*

5) To ascertain what PO looks like now, hair streaked? still skinny? etc. *AG IN.Y.*

6) To locate a laundry *near PO's place* and to make sure she isn't known there. - *(Not must HAVE CLEAR) AG IN.Y.*

7) To find out what PO is wearing the day of the this action. And what her hair is like. *AG IN.Y.*

8) To have someone available to stake out PO when she leaves her place the day of the caper, to ascertain when she leaves, what she's wearing etc. *106'*

11422

6 - Arc

VITAL TARGETS cont.

OP BREAKOUT

9) Security is IN IN on this project and "Need to know" is enforced heavily. The only one who needs to know what happening is the "PC" FSM and she only has to know her part. AG IN.Y.

10) To have a set of second hand clothes and a proper wig, (data) on what to buy obtained from FSM in V.T # 3) so that when the caper goes down, PC FSM can instantly get into the proper color or style of clothes or as close as possible. AG IN.Y.

11) To train all FSMs thoroughly on each one's actions; and the timing and coordination of each of these actions. AG IN.Y.

12) To insure that the chosen laundry is open during the day of the caper. AG IN.Y.

13) Obtain all the necessary clothes/ Blue Jeans etc that would be necessary for the fast change. AG IN.Y.

14) Obtain Wig that looks like PC, so that PC FSM can wear it during caper. AG IN.Y.

15) Brief Jim Ball or TM FSM on that the FBI or Secret Service will probably talk to them about PC. FSM should say his cover and that PC has been seeing people for years and she has many lovers when in Port or when drunk. Work this out carefully.

REIN

OP BREAKOUT

OPERATING TARGETS:

CHANNEL 1:

1) Telephone call PO to ascertain if she is home alone. She must be home alone.

AG I NY

2) When she has been found alone, telephone (during the work week) 2 Arab Consulates in NYC, from telephone booth nearest PO's place. Telephoner should be a girl that sounds like PO and the call should be fast, to the point, and impinge. It should go as follows: from a totally trusted non staff member.

" I just came back from Isreal (pronounces the way it is pronounced in Isreal) I've seen what you fucking basterds do. At least you're not going to kill my sister. I can get away with anything. I'm going to bomb you basterds. Say something in Jewish/swear or mumble something jewish.

AG I NY

CHANNEL 2:

1) Obtain a copy of Writer's DIGEST - a writer's magazine - (if not available get any writer's magazine.) person who obtains this magazine should be disguised in some way and not traceable back to the org. Don't order the mag. by mail. One should easily be found on the newsstands or in "back issues" stores.

AG I NY

2) Obtain the latest promo of the T.M. (transidental meditation) that PO is going to, same security as above.

AG. I NY

3) Cut out "letters" from both of the above publications. Include "CAPITOLS". Arrange the letters, pasted, on a clean piece of paper (not Org paper) If there is a blank page or nearly blank page in the writers magazine, use it, crossing out in ballpoint anything written on the page. Paste or glue the letters so that they say the following:

"All of you are distroying Isreal. You're just like them. My sister lived you basterds. I was there - I saw the wonderful people. Nobody can touch me. I'm going to kill you basterds I am going to bomb you. Kissinger is a traitor. I'll bomb him to. It makes me very sick. I must meditate. You are spying on me even in Isreal. Your day will come soon. I'll expose you and bomb you."

OPERATING TARGETS cont.

3) cont. ~~XXXXXXXXXX~~

Go to library and type out the name of the Consulate and address of the Nation that is most anti Israel (attacking it) . (No prints) Use "Capitols" on the envelope.

4) Place "letter" into the envelope, seal, and mail from the ~~PO's~~ mail box nearest to PO's place.

INSURE SECURITY / NO PRINTS on any letters, envelope, or paper, or stamp.

INSURE no paper from AG Office or Org is used.

Entire action should be done out of the Org.

NEED TO KNOW strongly enforced. PR, Communicator Legal should not know. Max should do this entire action.

If in doubt about "did my prints get on anything" throw everything away and start fresh.

CHANNEL 3:

1) FSM in VT # 3 telephones and makes a definite appointment with PO. Sometime when the laundry (in VT # 12) is open. The place should be a restaurant or bar/ one of the purposes of this action is also to get PO drunk.

AG I NY

2) FSM above ~~meets~~ meets with PO.

AG I NY

3) Steakout FSM (see VT #8) communicates with Case Officer and PO Double FSM (see VT # 1) and alert the former what PO has on, how her hair is arranged, does she have her usual coat on etc.

AG I NY

4) "PO FSM" changes to the closest clothes they have, matching POs. If PO has on Blue Jeans/ change to Blue jeans. If PO has on her usual coat put that on. (see VT # 3 and 4) What ever PO usually wears (a favorite sweater etc) a yellow dress, blue, green etc. sneakers, a yellow scarf etc should be had by PO FSM ready to change into. In other words several different out-fits should have been obtained by PO FSM, so that when the caper goes down, she can immediately change into the color or type of outfit that PO has on.

From the observation of the steakout FSM --- to the change of

PC FSM's clothes, only 3 minutes should have gone by. If PC let us say has her hair up, FSM puts her "hair up" very fast it doesn't have to be a good job/ just so it's "up".

AG I NY

5) PC FSM goes immediately into the laundry and does the following caper. (wearing sunglasses) This is done immediately, so that PC could have done it on her way to meet the FSM or FSMs for drinks.

(Patter/ PC FSM goes into laundry. Acts very confused. Says "I'm P.O. Do I have any clothes here? Clerk says no FSM demands clerk checks. Clerk comes back. Says no again. FSM screams. You're crazy, my name is PC, check again! When clerk says no or whatever he does, FSM goes PTS 3/ You're one of them! I'll kill you. You're a dirty Arab. You fucking bastards. I'll bomb you. I'll bomb the Arabs. I'll bomb the president. I'll kill that traitor Kissinger. You're all against me. "

If an item of PC's clothing was obtained at TM. FSM leaves this on the counter or drops it on the floor.

FSM

6) PC FSM leaves laundry immediately, turns the corner and gets into "pick up" car. Takes off "PC's coat" Wig or whatever. Changes her looks fast.

FSM

7) Mean while, immediately after PC FSM leaves laundry, observation FSM (see VT # 2) asks laundry clerk if they do Suade cleaning and also says, Boy was she crazy! real casually says I think you should call the police with all these nuts threatening to kill the president. FSM leaves. FSM should be disguised and not work on staff.

FSM

8) FSM calls from a phone about 5 blocks away, the FBI and says that she/he doesn't want to get involved and doesn't want to give her/his name but some nut girl in (the name of laundry) just went crazy and threatened to bomb the place and kill the president. With all these nuts running around I thought you should know. The guy in the laundry heard her too." HANGS UP. and leaves immediately and gets out of there. This call/ the FSM's voice should be disguised. All these type calls are taperecorded.(FSM should not be told this; just to disguise her voice.

FSM

PRODUCTION TARGETS:

CHANNEL 1: Should be done within 2 days of receiving this project.

CHANNEL 2: Should be done the day after the above channel is done.

CHANNEL 3: Should be done within 1 week after the above channel is done. (and when other FSHs can get an appointment with PO)

Channel 5 10 days after Channel 3 is done. (Conditional)

Love,

Puck

Op Freakout 2: No Prints!!!

Additional channel# on Op Freakout. (Lovely)

1) When TM or Pin Ball FSM meets with Lovely, they get drunk! Another FSM male, has a funny typed out joke. One of these full page sexy jokes. It has a plain white cover on it - a plain typewriter sheet. FSM has 2 copies of this. He shows one copy all around the bar, obviously so that lovely and FSM can see him doing it. Then drunkenly comes over to FSM's table and wips out "joke" to show FSM. Both FSM and "drunk" are careful not to touch plain sheet! The 2 sheets are folded as if to be mailed. When drunk picks up joke again, he whips it up by its corner and puts it in his long open wallet or puts it in his hat that he should be wearing for that purpose. If the hat is used, "drunk" goes into the bathroom and carefully puts "joke" into his wallet. Drunk is always acting the fool. Drunk leaves.

2) Drunk takes sheet with Lovely's prints to AG I being sure to get no prints on it.

FSMs

Drunk FSM

3) Write the following letter on a library typewriter and address the envelope to Kissinger in Wash. DC on the same typewriter. (absolutely no PRINTS.)

You are a traitor to your people YOU BASTERD. I've been there and seen what you have done. You're ONE OF them. I'M GOING TO KILL you I'M going to BOMB YOU. I have connection. NOBODY can touch me. You are a German Pig. You Should be in THE Concentration CAMPS. I Feel So Ill Because OF YOU And YOU GODDAM PIGS. YOU Die SOON. It IS a Phallic SYMBOL. I Think Transference. EPIDUS THE BOMB IS S ET TO GO. MY Sister ISRN A L. They Are Responsible . They Persecute Me I WILL Kill THEM AND YOU. YOU are All Aga inst ME. The dumb -

The above letter should be typed onto the blank sheet obtained in #1.

4) Mail the above, from the Mail Box nearest Love's place.

AG I NY

5) If the above 1 and 2 don't work out for any reason. Do the same action at T.M. with lovely and T.M. FSMs.

AG I NY

AG I NY

United States District Court
for the District of Columbia
A TRUE COPY

JAMES F. DAVLY, CLERK

By James F. Davly
Deputy Clerk

7-AK

OP BREAKOUT

CHANNEL 4:

1) Do not tell "Pin Ball" FSM or TM FSM about this OP, but alert them to immediately report any thing PC tells them. Have them try to speed up their relationship with PC. for feed back purposes. Get feedback on this op. (cle verly)

for use in other actions.

AG I NY

CHANNEL 5:

1) Wait 10 days after the completion of CHANNEL 3. If nothing has accrued from feedback, on PC. Then have the following action done:

~~FSM Male with Voice~~

FSM Female disguised voice, calls the Arabb Consulate and asks for the Press "attache". Talk through a piece of thin paper covering the mouth of the phone. This will be taperecorded but don't tell FSM on this. FSM says crying to Attache:

I just want to tell you there is someone a writer by the name of PC, who recently came back from Isreal. She works for Isreal Intelligence. She's also insane. She was in a Concentration Camp in Nats Germany. She's been seeing Psychiatrist for years. Her sister is also with Isreal Intelligence and lives in Isreal. She talks when she high on drugs or drunk. *lately she's been*

talking about bombing your embassy. I hate the damn
PC.

FSM hangs up and leaves fast.

7-13 ac

~~7-13 ac~~

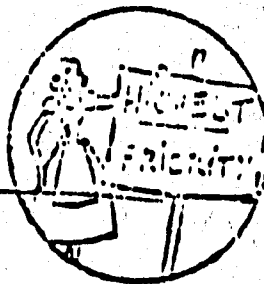
Exhibit

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Exhibit # 50

5/8/82

cc



DS I US C - DS I US

via info from US

CC: NAT'L SEC SI US

END NAT'L

31 July 1976

CL: 030/000/000

030/000/000

030/000/000

COMPLIANCE RPT
re: 030/000/000 302 OT 5

Dear R233yx Dick:

This target called to go through the list of all the National Agencies for penetration and list out the priorities.

This I have done and written the priority number next to the agency and attached is a sheet of the agencies with these priority numbers as evidence.

The ones not marked are very low priorities next to the top 13 and when the major agencies are done then I will revise additional data that has come in on the remainder of the agencies.

This is done and OK.

Love,

Cindy

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7/15/77
cc
P31 of 6

484-A

302

OT 5

LIST OF NAT'L AGENCIES WITHHOLDING FILES

The following are the nat'l government agencies that are withholding files and false reports, per the 31 Gov't Pjt. In order to aid you in your evaluation of the priorities that should be given to each agency, I have noted beside each agency, how much that agency is withholding. The key is as follows:

- * Means that they are withholding only a small amount of data, or that there is only a slim possibility that they are withholding a small amount. One star is also given to those agencies who are just withholding comm or data of ours, not false reports as far as we know.
- ** Means that they are withholding a medium amount - not a great deal, but definitely enough to be concerned about.
- *** Means that they are withholding a large amount - this would be a very heavy agency, with alot of data and false reports.

-
1. Administrative Office of the US Courts - *
 2. AID - **
 - 3. AEC (now ERDA) - ***
 - 4. CIA - *** #5
 5. Defense Communications Agency - *
 6. Defense Industrial Security Clearance Office - **
 7. Defense Investigative Agency - *
 8. Defense Investigative Service - *
 9. Defense Supply Agency - **
 - ~~10. DEA - ***~~
 11. Employment and Training Administration - *
 12. CCHI - **

484-B

13. Executive Office of US Attorneys - none in the office itself, but the separate USAtty's are definitely withholding.

• 14. FBI - *** #4

15. Federal Bureau of Prisons - **

16. FCC - *

17. Federal Protective Service - *

18. Federal Records Center - **

• 19. FTC - *** #11

• 20. FDA - *** #10

21. General Services Admin - **

22. Industrial Personnel Access Authorization Screening Bd - **

23. Industrial Security Contract Admin Service - *

~~24. IRS - *** Done~~

~~25. IP - *** Done~~

26. Narcotics and Dangerous Drugs Info Service - *

27. NASA - *

28. Nat'l Archives - *

29. Nat'l Bureau of Standards - *

30. Nat'l Clearinghouse for Mental Health Info - *

31. Nat'l Institute of Drug Abuse - *

32. NIMH - *

• 33. NSA - *** #9

34. Nat'l Science Fdn - *

35. NSC - **

36. Office of Nat'l Narcotics Intell - *

37. Office of the President - **

38. Office of the Vice President - *

484-C

- 39. SEC - *
- 40. Social Security Admin - **
- 41. SACDAP - **
- 42. Strike Force - *
- 43. Subversive Activities Control Bd - *
- 44. US Dept. Treasury Enforcement Communications System - *
- 45. US Air Force - *** #13
- 46. US Army - *** #14
- 47. US Atty Gen'l - *** #11
- 48. ~~BNDD~~ (NOW DEX) - *** - Done
- 49. US Bureau of Prisons - *
- 50. US Civil Service Commission - **
- 51. US Coast Guard - *** Done
- 52. US Consulate Barcelona - **
- 53. US Consulate Belfast - **
- 54. US Consulate Cadiz - *
- 55. US Consulate Casablanca - ***
- 56. US Consulate Curacao - **
- 57. US Consulate Durban - *
- 58. US Consulate Frankfurt - *
- 59. US Consulate Hamburg - *
- 60. US Consulate Hamilton - *
- 61. US Consulate Japan - *
- 62. US Consulate Johannesburg - **
- 63. US Consulate Liverpool - *
- 64. US Consulate Madrid - *
- 65. US Consulate Melbourne - **

STATZ P20T. #1

- 66. US Consulate Nassau - *
- 67. US Consulate Perth - **
- 68. US Consulate Recife - *
- 69. US Consulate Tangier - *
- 70. US Consulate Vancouver - *
- 71. US Consulate Wellington - **

One thing I want to indicate regarding the consulates and embassies, is that they all come under the State Dept. As such, for most of the data I've indicated they are withholding, it was given to us by State. Any handlings for these groups could just be taken into account when looking at the State Dept, I would think.

- #3 72. US Customs - *** we have most of the files
- 73. US Defense Attache Office - **
- 74. US Dept. Commerce - **
- 75. US Dept. Defense - *
- 76. US Dept. Defense Advanced Research Projects Agency - *
- 77. HEN - *** #12
- 78. US Dept. Interior - *
- 79. US Dept. Justice - *** #2
- 80. US Dept. Labor - *** #13 - DONE
- 81. US Dept. State - *** - #1
- 82. US Dept. Treasury - *** #6
- 83. US Embassy Adelaide - * STATE DEPT.
- 84. US Embassy Athens - ***
- 85. US Embassy Australia - **
- 86. US Embassy Barbados - *
- 87. US Embassy Bermuda - **

Exhibit

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Exhibit 1151

5/8/82

RL

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C-10
p90/196

Guardian NW
D/O Int NW

9 March 1970

Re: Successful and Unsuccessful Actions

Dear Jane,

The following is a list of the successful and unsuccessful actions used by intelligence.

Successful.

Prosecuting Traitors:-

- 1) In the US finding evidence of a crime and handing it over to the police or vice-squad. Etc in any crime.
- 2) In the UK- Finding evidence of a crime against the CRS, and a having a representative of the church press extra charges for a prosecution.

Regularly getting out files and reading through them. Especially any files or cases that were handled prior to your coming on post.

If reading through files brings up a connection you were not aware of, or had forgotten chase it up and get out the other files pertinent to the area.

Use the files regularly and continuously referring to them as often as possible.

Crossfiling should not only be done under names of people but under, groups and organizations as well. Also under subjects. In other words thorough crossfiling.

Use of telephoning to get simple information such as addresses etc. rather than a personal visit.

Contacting the secretary or aide of the person you are interested in and chatting them up. Note this is very successful in getting tricky information that is not available in other areas. Is Dr. so and so on his vacation now. Where is he? How long will he be gone.

I spent
RM letterhead of some organization that is curious. I.e. have it printed up and use it to make queries. Use some fairly safe address but don't be over cautious. If you have a letter head nobody seems to bother checking it. Examples "Ford Foto Features" or "The Council for Human Relations in Industry". If you have a letter head of any sort you will get answers to your questions 75% of the time. Of these using a phoney News Agency is the most successful.

Using 2B on someone high in the government to seduce them over to our side. This particular action was not started as an Int action but was more personal. It did however move into a LP activity.

535.1-A

Getting Introductions-Ex. If you want to see B but you need to be on more secure ground, you phone A and ask him what you want. When he can't answer you ask if B would be able to help. A says yes and then you see or phone B and tell him that A had said you should get in touch with him.

The regular use of Reference books. In the UK I use
Medical Directory (list of Doctors and where they worked)
Who's Who (list of notables and what they did)
Newspaper Directory (list of papers, publishers director's etc.)
Who's who in Journalism (List of Newspaper staffs)
Business Background of WPS (Just what it says it is)
Anatomy of Britain Today(breakdown of Britain by, Civil Service, television, Press, Radio, Banking, Aristocracy, Financiers, Industry, Diplomats etc.)

I would imagine that there are similar publications in each area of the world. There are others that could be used.

Getting all the National Press and cutting out articles about names and groups, psychiatry, finance, politicians of interest, espionage etc. and filing

Getting birth Certificates of subjects of interest. helps start trace of the early years.

Getting advance information on the legal side so that we know what enemy legal is doing. Example. a recent legal case depended on whether the enemy had documents that proved so and so. Int found that the documents were fifth hand information based on hearsay by the fourth person. Although our info didn't specifically affect the case it did give our legal more certainty to press on.

Infiltrating an enemy group with the end to getting documents. These can either be about their own plans or what they have on us.

Covert third partying with forged or phoney signatures.

Anonymous third partying. Particularly the Internal Revenue service appears to follow up every tip off they get.

Getting information out of files. This is of course only vital files, not just any files.

Direct theft of documents.

Org Lines

Taking over and doing Sec checks on certain possible sec risks rather than letting HCO Continue.

Insisting that old recognized Sec Risks be kept off lines. Best terminal for this is whoever is the most security conscious on the HCO line.

Insisting that Troublesome sources policy be kept in.

Use of companies house & company registrations to trace directors share holders etc.

Use of Newspaper libraries for information:

Impersonating a reporter over the phone to get information.

Tracing Newspapers, directors etc.

Unsuccessful actions

Investigating noisily- This has actually produced more trouble than results.

Interviewing someone who wants to sell information. On the whole this has only produced con-men and no results. There is nothing wrong with offering to buy information but watch out for the guys who approach you first trying to sell it. This includes selling it for info other information, favours, or cash.

Infiltrating with a view to only gathering general information and verbal reports rather than documents.

Using an SP to get information on another SP.

Keeping the CIU board up to date. This makes a very pretty office decoration but I have not really found it of any use.

Bugging and the use of any electronic devices have on the whole produced nothing.

Keeping very broad clippings on the general political scene of an area. This is stuff such as who stands on what election platform etc. It is not really of use except where it involves someone we are interested in. Of course stuff on Privacy, Civil Rights, Psychological practices, communism etc. are of interest.

Publishing the results of an investigation when a crime is found.

Attempting to trace individual reporters.

Launching an anti-press campaign

Depending on a plant having a degree that will "get him into the files" a degree may help but the plant had better have brains as well.

Depending on big money alone to get in and out of places. "Money talks" does not hold true everywhere in the world.

Depending on SD specifically as a means of getting info. (note I mentioned earlier as a successful method. I feel that this is because the girl concerned had actually fallen for the government person and did not go into the affair with the intention of getting information)

In the UK attempting to prosecute someone for a crime not done to the organization, but to some one else.

Stistant third Partying where you write a phoney letter from A to B talking about C, that is full of enthata and generalities. The letter must be much more subtle to work.

Using elaborate cover stories that require great deals of proof and money to keep going

Impersonating a government Intelligence Officer.

Mixing covers on the same job. Telling one guy you're doing one thing and telling or implying to someone else that you are or are doing something else

Putting out lines and waiting for people to come to you. Telling everyone that you're the big authority on Shmuck and then waiting for them to contact you about shmuck.

Exhibit

53

Exhibit # 53

5/8/82

Opu chuckshent - page one

#

Auth 20

1. Read GO Intell Its Role.
2. Demo how an Op could result in harm to the Org if it was done without consulting establishment data.
3. Clay demo a covert operation on an opponent which him and the beneficial result to us.
4. Clay demo how knowing the mental processes of persons can make for an effective Op.
5. Demo how using violence in an Op could bring about public scandal on the Org.
6. Clay demo what would happen to a Scn area where no or ~~and~~ ineffective Ops were conducted.
7. Read Scn Five, HCOPL 14Aug73
8. Do the drills in the drill section of this PL.
9. Select an enemy and try to write an attack article on them without using any of the 7 criteria for a press story.
10. Read HCO Manual of Justice, "Punishment", "The ~~books~~ of All Crime".
11. Read The Guardian, 1 Mar 66, "Intell Secta".
12. Read Attacks on Scientology, 25 Feb 66.
13. Take steps 1-4 and write an essay on how these steps can apply to an operation.
14. Read Public Investigation Section 17 Feb 66
15. Demo three different channels through which crimes could be exposed covertly (ie, source not CofS)
16. Read Intell Actions 25 Apr 68.
17. Demo why proper filing is important to Ops.
18. Read Intell Actions-- Covert Intell Data Coll, 2 Dec 69.
19. Clay demo what happens if no care is taken to cover the source of covertly collected data when it is being exposed.
20. Demo the main similarities, differences and identities between covert data collection done by (1) Collections (2) Operations.
21. *rate, M7, M4 the section on "Covert Operations".
22. Look up in a BIG dictionary, use in sentences, demo kit and get conceptually the following words:

COVERT
DISCREDIT
PROPAGANDA

OPERATION
OVERTHROW
EXPOSURE

EMBARASS
REMOVE
OPPONENT

mod
of 8

304-A

5-77
5/8

22. Demo why a covert operation is intended to embarrass, discredit and restrain an opponent and the beneficial result to us.
23. Clay demo a covert operation on an opponent which embarrasses him and the beneficial result to us.
24. Clay demo a covert operation on an opponent which discredits him and the beneficial result to us.
25. Clay demo a covert operation on an opponent which overthrows him and the beneficial result to us.
26. Clay demo a covert operation on an opponent which removes him and the beneficial result to us.
- *26-A. Demo the difference between an actual and possible opponent.
27. Demo the difference between an actual and possible opponent.
28. Write up a program to run an operation on an enemy which utilizes the "enemy propaganda tactic" which has been used against us. (You do not need to get as detailed as you would in a project, but include enough data so that you could write detailed projects off of your program if you needed to.)
29. Clay demo why it is important to have a known objective when engaging in a covert operation.
30. Demo what would happen to your program in #28 if its objective was total annihilation of that enemy group and it never lead to an overt operation.
31. Demo how much exposure it would take for your #28 program to (a) fade out; (b) be blown.
32. Write an essay on why ops are based on data, and how the quantity and quality of data can effect the product of the op.
33. Read the WFMH Program.
34. Demo how not doing target #3 would effect the product of the Program in an area.
35. Enemy Names, 16 Feb 66, is to be read.
36. Taking the data and example in paragraphs 8 and 9, choose a recent attack from your own area and demo a similar B1 handling of that attack.
37. Demo why running an operation on enemy territory or subject is better strategy than running an operation on your own territory or subject.
38. Read Battle Tactics, 16 Feb 69 II.
39. Demo what happens when you attack a wrong enemy target.
40. Write an essay on how you could get an enemy to attack a wrong target, and why this is a good tactic.
41. In reference to P. 2, paragraph 4, Clay demo: why it is important to know your public's hate and love buttons when running an operation on an enemy.

*26-A Clay demo a covert operation on an opponent which restrains him and the beneficial result to us.

304-B

42. Targets Defense, 16 Feb 69 IV, to be read.
43. Taking targets T1-T7 on page 2, demo how operations could assist the GO in accomplishing each target.
44. Read Info Bureau Stat GO 1150, 7 May 47.
45. Locate the definition of an "incident" which aligns to operations products; Write a summary report of a fictional months work in an operations section. Now with a different colored pen underline the incidents in that report.
46. Read Intell Estimates and Predictions, GO 907, 22 Aug 73.
47. Clay demo the relationship of Ops to CIC and Collections in the overall activity of finding and handling a WHO.
48. See page 2, "Prediction: Dogs will continue..... (8 lines).....give up her career of crime." Write up a simple general plan to handle Mrs. Snap from an Ops viewpoint.
49. Read Purpose of GO, GO 1514, 26 Jan 75.
50. Do clay demo stated in last sentence of this issue from the viewpoint of the Ops post.
51. Read C/S Series #22 (HCOB)
52. (reference section: "Nature of Man") If you were being attacked by the local psychiatric society and knew by investigation that "Dr. Fender" of that society is the insane person within the society instigating attacks on your Org, which would be the better target of an operation, the society or Dr. Fender? Why? Write an essay on this explaining your reasoning in detail.
53. (reference section: "Technique") Taking the way you would assist a Scientologist out of an insane state or prevent it, utilize the theory of the technique and apply it to an Ops plan to attack or cave-in an enemy. Demo it.
54. Read The Anti-Social Personality, The Anti-Scientologist, HCOB, 27 Sept 66.
55. Read P.A.B. #124, "Communication and Is-ness", 15 Nov 57.
56. Demo what would happen if BI only defended an Org from its enemies and never ran any offensive operations.
57. Rate, M7, M4 and damn each of the Operations Definitions.
58. Demo the activity and product of conducting a button survey.
59. Demo a simple Ops plan and its three separate channels.
60. Demo a created BI incident and how it could be exploited by PR.
61. Demo the differences in the current state of Scientology in an area, when Ops has: (1) a totally unrestrained enemy; (2) a restrained enemy; (3) a removed enemy.
62. Read the USBI Operations Weekly Stat form.

63. Read the Third Party Law, 26 Dec 68.
64. Demo what would happen if you continued to battle an attacker, but never located or handled the instigator behind your problems with that attacker.
65. Write up a situation in which you could use the 3rd Party Law as the basis for an operation, what your product would be, and how you would go about achieving that product.
66. Read the Target Series.
67. Mock up a fictional project to carry out off the major target of: "(person) of (group) losing his/her job from which he/she is attacking Scientology."
68. Now demo what could happen if you did, or had this project done without the major target stated.
69. Demo what could happen if there were no primary targets.
70. Demo what could happen if there were no vital targets.
71. Demo what could happen if there were no conditional targets.
72. Demo what could happen if there were no operating targets.
73. Demo what could happen if there were no production targets.
74. Read Black PR, PR Series 7.
75. Demo the differences, similarities and identities between regular PR and Black PR.
76. Read the survey data in PR Series 13, 14, 15R, 16.
77. Mock up an Ops situation for which a more formal type survey might be advantageous to use; mock up the cover you'd use while taking the survey, how it would be executed, and what questions you'd ask.
78. Read How to Handle Black PR, PR Series 13.
79. Demo how a rumor that has no basis in fact can go through a society.
80. Demo why an Ops propaganda campaign based on true data lasts longer and is more effective than one based on false data.
81. Write an essay on what you would do if while running operations on ~~an~~ an opponent, the opponent begins to run a black propaganda campaign on you (ie, tries to discredit your ops actions). Include how you would do it.
82. The Enemy Line, PR Series 27, read it.
83. Demo an ops situation where the enemy makes a "Glutz PR" mistake in trying to defend against your op, and how you would capitalize on it.

84. Read FBI Bulletin, May 67, "Typewriter Examinations".
85. Mock up an Ops situation which involves your typing up a document which is intended to wind up in enemy hands. Take each point listed in the FBI write-up which could present a security problem to you and write up how you're going to handle it when typing up your document.
86. Read FBI Bulletin, Feb 67, "Document Examination from a Photocopy".
87. Mock up an ops situation where you'd want to use an altered or phoney document. Based on the FBI write-up, write out what steps you'd take to make the document most difficult to examine for authenticity.
88. Now produce such a document.
89. Read FBI Bulletin, 1966, "Approximate Age of a Document".
90. Mock up a document which would be hard to date as to its creation.
91. Now attach a cover sheet to the document explaining each basic thing you did to accomplish a document which is hard to date.
92. Read the book, Black Boomerang, by Sefton Delmar; and while reading the book note down any major ideas you get on applying a method or technique presented in the book to your Ops post duties.
93. Develop one or more of these ideas in a write-up, and also list any points you would need to research further in order to fully carry it out.
94. (prerequisite to doing Spy and His Masters items is completion of Spy and His Masters items on the GO WW check-sheet - GO 1314)
Read Chapt. 3 of Spy and His Masters.
95. Clay demo why it is important for the operations case officer to be able to run tight control on the operations agent while an op is in progress.
96. Read Chapt. 4. and Chapt. 5.
97. Write up an operation in which the agent carrying out the operation would need a pretty good cover.
98. Now write-up in full a cover for that operation agent which is:
 - a. Not sufficient for the operation and the agent and the Org would get blown on the simplest investigation.
 - b. Overly sufficient for the agent, would never get blown, and would be so elaborate and time consuming to mock up that it would be impractical.
 - c. Sufficient to get the job done, cannot be blown, and can be built in enough time to be of use.

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Fit

99. Clay demo a situation in which you are exposing documents obtained by a collections agent still in place, but the cover you are using in exposing those documents so that the collections agent ~~will~~ doesn't get blown.
100. Read Chapt. 6.
101. Now go out and observe and speak with several Scientologists and several wogs on non-Scientology subjects. Note any all major observations about Scientologists which tipped you off to them being a Scientologist that you did not observe in the wogs. List them out. (This drill must be done honestly from the viewpoint of not knowing beforehand whether the person is a Scn or not)
102. Now for each item on the list write out how you would handle those characteristics in a potential ops agent so that he would not be spotted as a Scn. after being observed by or talked to by the enemy.
103. Read GO 1735 Intell and PTSs.
104. Clay demo why you don't use a PTS agent to carry out an operation.
105. Read 2 Dec 74, DDG I WW Write-up on Plants.
106. Demo the relationship (the proper one) of the Ops agent, the Ops case officer, ops headquarters and the ~~pannman~~ enemy individuals throughout a sequence of an op beginning, the agent getting caught doing something considered improper all the way through to the end of the cycle which finds the case officer and headquarters never being found out about.
107. Read Ops US Successful and Unsuccessful Actions, Aug 75.
108. Demo each successful and unsuccessful action:
109. Read Br 1 US write-up, 24 July 75, Agents, Selecting and Running Them. Case Officer Actions.
110. Interview 3 non-B1 people and through good two way comm and obnosis determine each person's motivation. Write up results and if you'd recommend each person as an Ops agent(based only on this criterion).
111. Interview 3 non-B1 people determining as much as possible their ethics level (chart of human evaluation; Science of Survival); then check their ethics history in the files. Write up results and if you'd recommend them as Ops agents. (based only on this criterion).
112. Now interview and check ethics files on 3 more non-B1 people locating both their motivation and ethics level. Then check any other data or files, etc. necessary to determine whether or not you'd take them on as ops agents.
113. Clay demo what happens to an ops agents production and products when the ops case officer has dropped out good and regular 2 way comm with the agent.

114. Read WW write-up "The Tailor and Following of Agents: What to Do."
115. Get a coach to drill you through dummy examples, him being the one who's tailing, you being the one tailed. Do gradually to the point where you feel confident about doing it and the coach really gets the missed-withhold phenomena.
116. Do TR/3 Int. on ops subjects.
117. Do TR/3 Reporting on Ops subjects.
118. Do TR/3 Blown cover in ops situations.
119. Read "The Case Officer", 17 Dec 74 WW.
120. Demo why infoing the ops agent of major GO wins and keeping the agent assured of his worth is often a valuable function of the Case Officer.
121. Read ⁱⁿ the book CIA, and Cult of Intelligence, Chapt. 6., by Marchetti and Marks.
122. Read the following parts of the book RGE, by J. Barron. Chapt. 4- p.78 "Disinformation Dept A", "Executive Action Dept. V."; Chapt 6- p.86 "Tech Ops Dir"; and Chapters 8, 11 and 13.
123. Read the book Psychological Warfare Against Nazi Germany by Daniel Lerner, 1971.

304-6 FH

The Art of War, by Sun Tzu
translated by Samuel B. Griffith
Oxford University Press 1972.

(It is recommended that a good map of China and a Chinese history book are available if needed while reading this book.)

- (1) Read Biography of Sun Tzu, p.57. (0 rate)_____.
- (2) Read Chapt. 1 "Estimates". (0 rate)_____.
 - (a) Clay demo, ^{it}it is advantageous to use deception when attacking"._____.
 - (b) Do a demo on how weather could adversely effect an operation if not planned for. _____
- (3) Read Chapt. 2 "Waging War". (0 rate). _____
 - (a) Write an essay on how Sun Tzu's statement "For there has never been a protracted war from which a country has benefited" could apply to running operations. _____
- (4) Read Chapt. 3 "Offensive Strategy". (*rate). _____
 - (a) In an essay apply Sun Tzu's statements 4-7 to operations on a Scientology enemy situation and explain how Sun Tzu's priorities are valid in that situation. _____
 - (b) Clay demo how "knowing the enemy" makes for a better operation than being ignorant of the enemy. _____
- (5) Read Chapt. 4 "Dispositions". (0 rate) _____
 - (a) Demo how an operation can initially be a successful attack, but eventually result in overall defeat. _____
- (6) Read Chapt. 5 "Energy". (0 rate)_____
 - (a) Demo how operations are similar to Sun Tzu's "extraordinary forces". _____
- (7) Read Chapt. 6 "Weaknesses and Strengths" (*rate). _____
 - (a) Taking Sun Tzu's statements 7,8,10,11, from the attack viewpoint, demo the differences as to what happens when you attack an undefended point in an enemy and a defended point. _____
 - (b) Clay demo how doing the opposite of statement #9 could put you on the defense and at effect. _____
 - (c) Demo why statement #26 is important to operations. _____
- (8) Read Chapt. 13 "Employment of Secret Agents" (0 rate)
 - (a) Demo how the different types of agents, statements 7-11, could be used in an operation. _____

-END-

and eat conceptually the following words:

C xvi - 105

304-H

Exhibit

54

Exhibit # 54

15/8/82

RL

VITAL TARGETS:

1. This Programme is to be done by the Asst. Guardian or the D/A/Guardian for Intelligence, if this post is held separately.
2. To establish intelligence files on all such persons found to be infiltrators, double agents, and disaffected staff members, Scientologists and relatives of Scientologists.

OPERATING TARGETS:

1. To make full use of all files on the organization to effect your major target. These include personnel files, Ethics files, Dead files, Central files, training files, processing files and requests for refunds.
2. To assemble full data by investigation of each person located for possible use in case of attack or for use in preventing an attack and to keep files of such.
3. To be alert to usual security precautions and to see that these are performed by the organization; such as proper locking of the premises, security of keys, locking of files, the changing of locks if keys have been lost, proper safes, etc.
4. To keep off staff and off org lines any person who has ever betrayed Scientology or who has threatened to betray or blackmail Scientology.
5. To ensure the Policy Letter on Physical Mutiling, Insanity and Potential Trouble Sources is not violated and to be alert to any possible violation.
6. To maintain a good liaison line to Ethics and ensure that the Ethics Officer alerts you to any person who might attack Scientology.
7. To be alert to any organizational theft or disappearances of records and files as a possible indication of the presence of an infiltrator or double agent. Infiltrators are frequently those who have recently "joined" Scientology and so can be watched. Double agents are usually detected by matter, down state, disorder in their areas and no case gain.
8. To be effective and imaginative in your collection of data and in your actions to nullify any attack or threat of attack.
9. To keep your Asst. Guardian fully advised and the D/Guardian for Intelligence WW, who will inform the Guardian WW in such matters.

PRODUCTION TARGET: This is a continuing Programme on which Projects will be issued from time to time.

Mary Sue Hubbard

CS-G

600-B

Exhibit

55

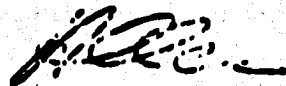
Exhibit # 55
5/8/82 - Al

27 Sept 76

INFO RE: DONNA REEVE

1. Donnas auditing folders start in July, 1963 at St. Hill UK where she was on the SHSBC. She was being run on Gr. 6 processing at that time. During this auditing she R/Sed on Jane Kember, LRH, Herbie Parkhouse, and Fred Hare.
2. Donna has been in Scientology since at least 1952. She attended the Doctorate Course in Philadelphia at that time. While at the PDC she was promiscuous: She slept with 4 or 5 men during the course, 2 of them on the org premises. She has quite a record of promiscuity in these early years. With three male PCs, she let them touch her genitals during sessions because they "got into sexiness." She has masturbated regularly since she was 8 years old, mentions doing it once with coffee grounds (doesn't say how) and once had a puppy lick her. She slept with Alan Kapular while he was married to her cousin in 1952, which created a big stink in her family. When she lived in Greenwich Village (doesn't say when) she claims that she "screwed anything with pants".
3. In an Enemy formula write-up done at ASHO she mentions leaving her husband, Moe, in May, 1952 but she does not give his last name. There is no mention of it in our files. She also was married to Bill Fisk who was shot while she was on the SHSBC at St. Hill. Bill had been sleeping with Phoebe Hjelm and Helene Grimes (now Simmons) before he got shot for sleeping with a student at Seattle Org. Donna had agreed that he could sleep around while she was away. Donna denied him sex even when she was with him and would masturbate to satisfy herself.
4. Dec. '64 to Aug '67 she was at the DC org then she went to the Detroit Org.
5. She blew from ASHO sometime in 1969, no specific date.
6. In July, 1970 she is back on ASHO staff and is troubled with insomnia, says she may go Type III if it's not handled.
7. June, 1970 she does an Enemy formula O/W write-up (mentioned above and the source of much of this data) in which she mentions that while auditing at the Fullerton Mission in Orange County that she left an OT III bulletin in her bureau drawer for some time, unlocked. She also says her Class 8 Pack was in a file cabinet that anyone could have opened by pulling on the drawer.
8. There is no record of her current whereabouts in AOLA files, nor her current status.

Love,



Allen

0-0146

628

Exhibit

56

Exhibit A 56
5/8/87
United States Court of Appeals
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 71-7066

September

1971
Term, 1971

UNITED STATES OF AMERICA

v.

"ARTICLE OF DEVICE . . . 'HUBBARD
ELECTROMETER' OR 'HUBBARD E-METER,' ETC.

FOUNDING CHURCH OF SCIENTOLOGY et al., Appellants

Appeal from the United States District Court for the District of Columbia,
before HAZELON, Chief Judge, and WRIGHT and HICKINSON, Circuit Judges.

JUDGMENT

This cause came on to be heard on the record on appeal from the United States District Court for the District of Columbia, and was argued by counsel. While the issues presented occasion no need for an opinion, they have been accepted for consideration by the court. See Local Rule 13(c).

On the basis of this record we cannot say that the findings of the District Court are clearly erroneous. The judgment of the District Court, however, would involve the Government and the courts in an excessive entanglement with religion. *Levin v. Hurstman*, 408 U.S. 602 (1971), in circumstances in which the Government's interest in law enforcement can be protected by a narrower remedy. *Sheehan v. Verner*, 374 U.S. 398 (1963). Therefore, it is ORDERED by this court that the order of the District Court is amended to read as follows:

ORDER

In accordance with the findings of fact and conclusions of law contained in the Memorandum Opinion of this Court dated July 30, 1971, which are incorporated herein and made a part hereof, it is

ORDERED, ADJUDGED, AND DECREED that the article of device under seizure, known as the Hubbard Electrometer or the Hubbard E-meter (hereafter referred to as E-meter) is misbranded within the meaning of 21 U.S.C. § 332(a) and (f)(1) and the seized articles, *infra*, the E-meters and all writings seized, are condemned pursuant to 21 U.S.C. § 334(a); and it is further

ORDERED, ADJUDGED, AND DECREED, pursuant to 21 U.S.C. § 334(a), that the United States of America shall have and recover from the claimants herein jointly and severally all court costs and fees (excluding costs and fees relative to the appeal following the first trial), and storage and other proper expenses, to be taxed; and it is further

ORDERED, ADJUDGED, AND DECREED that the United States Marshal for the District shall release such condemned E-meters and literature from his custody to the custody of the claimants, the Founding Church of Scientology, Washington, D.C., Inc., for the purpose of bringing the condemned devices and literature into compliance with the law provided such claimant, with

United States Court of Appeals
for the District of Columbia Circuit

FILED MAR 1 1973

FILED MAR 1 1973

90 days from the date of this Order on requests and (a) pay in full the aforementioned court costs and fees, and storage and other proper expenses of the proceeding herein, and (b) execute and file with the Clerk of this Court a good and sufficient penal bond with surety, in the sum of \$20,000, payable to the United States of America and conditioned on the claimant's abiding by and performing all the terms and conditions of this Order, and if claimant does not avail itself of the opportunity to repossess the condemned article within the 90 days specified, the United States Marshal for this District shall forthwith destroy all E-meters in his possession and control; and it is further

ORDERED, ADJUDGED, AND DECREED that such condemned E-meters and literature shall be deemed to comply with the law if and only if they are used, sold or distributed in accordance with the following specific conditions:

1. E-meters shall be used or sold or distributed only for use in bona fide religious counseling.

2. Each E-meter shall bear the following warning, printed in 11-point leaded type, permanently affixed to the front of the E-meter so that it is clearly visible when the E-meter is used, sold, or distributed:

The E-meter is not medically or scientifically useful for the diagnosis, treatment, or prevention of any disease. It is not radically or scientifically capable of improving the health or bodily functions of anyone.

3. Any and all items of written, printed, or graphic matter which directly or indirectly refers to the E-meter or to Dianetics and/or Scientology and/or auditing or processing shall not be further used or distributed unless and until the item shall bear the following prominent printed warning permanently affixed to said item on the outside front cover or on the title page in letters no smaller than 11-point leaded type:

WARNING

The device known as a Hubbard Electrometer, or E-meter, used in auditing, a process of Scientology and Dianetics, is not medically or scientifically useful for the diagnosis, treatment, or prevention of any disease. It is not medically or scientifically capable of improving the health or bodily functions of anyone.

and it is further

ORDERED, ADJUDGED, AND DECREED that the bringing of the seized and condemned E-meters and literature into compliance with the provisions of the Federal Food, Drug, and Cosmetic Act, as specified in this Order, shall be performed under the reasonable supervision of a duly authorized representative of the United States Food and Drug Administration. Claimant, the Founding Church of Scientology of Washington, D. C., Inc., shall compensate the United States of America for costs of reasonable supervision of matters under the direction or control of the Church at the rate of \$18.00 per hour, per representative for each hour or portion thereof actually employed in such supervision under the terms of this Decree or salary or wage, and where subsistence expenses are incurred, at the rate of \$25.00 per day or portion thereof per person for such subsistence expenses. Said claimant shall also compensate the United States of America for necessary traveling expenses and for any other necessary expenses which may be incurred in connection with supervisory responsibilities of the United States Food and Drug Administration; and it is further

ORDERED, ADJUDGED, AND DECREED that within one year from the date this Order becomes final the United States of America shall file with the Clerk of the District Court a full statement indicating whether and to what extent the terms and conditions of this Order have been performed, and shall then show cause why the bond given in this proceeding shall not be cancelled and discharged; and it is further

ORDERED, ADJUDGED, AND DECREED that the District Court expressly retains jurisdiction for a period of one year from the date this Order becomes final to issue such further orders as may be necessary to the proper disposition of this proceeding.

It is FURTHER ORDERED by this court that the judgment of the District Court, as amended, is hereby affirmed.

For Court