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SECTION D

EXHIBITS

PROTEST

CHURCH OF SPIRITUAL TECHNOLOGY

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PROTEST

Section D: Relationship with L. Ron Hubbard

Exhibit No.

D-1	Declaration of H. Jentzsch
D-2	Declaration of J. Peterson
D-3	Declaration of N. Starkey
D-4	Declaration of M. Yager (including Exhibit C, Ron's Journal 38)
D-5	Declaration of G. Leservre
D-6	Declaration of C. Cobb
D-7	Declaration of Officers and Directors of Churches of Scientology located in the U.S.
D-8	HCO Policy Letter 12/21/65: "LRH Financial Relationships to Orgs"
D-9	HCO Policy Letter 1/4/66: "LRH Relationship to Orgs"
D-10	HCO Policy Letter 9/1/66, reissued 12/10/80
D-11	Declaration of L. Spurlock (3/23/85)
D-12	Order and Preliminary Injunction, RTC v. Dahlkvist, C.A. No. 831749G(CM) (S.D. Cal., Nov. 30, 1983)
D-13	Preliminary Injunction and Further Findings of the Court, RTC v. Wollersheim, C.A. No. 85 7197 MRP (C.D. Cal., Nov. 23, 1985)

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IN THE 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 HEBER JENTZSCH

I, HEBER JENTZSCH, declare and say:

1. I am the President of the Church of Scientology International, Inc. (hereinafter "CSI"), a California corporation, and have held that position since 1981. CSI is the "Mother Church" of Scientology which is the senior ecclesiastical organization of the Church and has the highest ecclesiastical authority in terms of Church doctrine. As President of CSI, I am its Chief Executive Officer responsible for carrying out the daily affairs of the corporation pursuant to corporate policies established by the Board of Directors of CSI.

2. I have been informed that defendants in this action are contending that L. Ron Hubbard is the managing agent of the Church of Scientology and based thereon are trying to take his deposition. I make this Declaration in response to defendants' Motion to Compel that Deposition.

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3. L. Ron Hubbard is the Founder of the Scientology religion and the spiritual guide and teacher of all Scientologists and of all the Churches and missions of Scientology. His writings and recorded lectures form the Scriptures of the religion of Scientology. The Scriptures include all of the doctrines, tenets, sacraments, rituals and practices, axioms, codes and Creed of Scientology. This body of work consists of some 50 to 60 books, thousands of recorded lectures, and numerous other writings in the form of individual articles, bulletins and policy letters. The Scriptures of Scientology are used in the practice of auditing (which is the central religious practice of Scientology) and the training of auditors, to the exclusion of all other materials.

4. From the beginning of the development of the religious doctrine of Scientology in the 1950's, until today, and for future generations, L. Ron Hubbard has been and will remain the fundamental source of our religious doctrine and philosophy. Thus, a 1975 Board Policy Letter states:

"Scientology recognizes and reveres the spiritual leadership of L. Ron Hubbard as the Founder, and as the source of the religious philosophy of Scientology." BOARD POLICY LETTERS 24 September 1973RA Issue XIII (Revised 8 May 1975).

5. Although Mr. Hubbard is revered by Scientologists as the Founder of our religion and the originator of Scientology Scripture, Mr. Hubbard holds no corporate, legal or managerial position whatsoever in any Church of Scientology.

6. In my capacity as President of CSI, I am familiar with the corporate structures of the Churches of Scientology. Although I have been informed that the defendants in this action contend that these Churches lack corporate integrity, this is emphatically not the case. Each Church is a separate and distinct legal entity with its own articles of incorporation and bylaws. Each Church is required to determine its own affairs through its separate Board of Directors and officers which exercise legal authority over these corporations. Churches of Scientology are affiliated with each other in an ecclesiastical, but not in a corporate or legal sense. Mr. Hubbard does not have any legal authority over these Churches. He is neither an officer, director nor managing agent of these Churches. Mr. Hubbard cannot, in any fashion, bind any Church contractually. He is not vested with any legal power or authority to act for or on behalf of the Churches of Scientology concerning any matter. Mr. Hubbard's authority is solely ecclesiastical based upon parishioners devotion to Mr. Hubbard as the Founder of their religion. To understand the role and position of L. Ron Hubbard in the religion of Scientology, we can only refer to the reverence with which other religious founders are viewed in other Churches. For example, we view Mr. Hubbard in a similar way to the Mormon Church's view of Joseph Smith, who founded the Mormon religion.

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7. Mr. Hubbard can, if he so deigns, speak on behalf of the Church solely on an ecclesiastical basis -- expounding upon his religious works, their nature and applicability. Since his seclusion

in 1980 to concentrate on his religious researches and other writings, Mr. Hubbard's contact with any church (which has only been in writing) has been infrequent. Moreover, his contact and involvement with the Churches is at his initiation and according to his determination. In my capacity as President of CSI, I am knowledgeable of both the corporate and ecclesiastical hierarchy of all of the Churches of Scientology. Based upon my own personal knowledge, and my communications with senior officials of Scientology, I have determined that there have been no communications to or from Mr. Hubbard (or for that matter any intermediary) whatsoever by anyone within the Churches of Scientology or any Scientology related organization since well before defendants first notice, dated August 21, 1984, to compel Mr. Hubbard's deposition in this action.

8. I can also attest that neither I, nor anyone else within the Churches of Scientology to my knowledge, has knowledge of Mr. Hubbard's whereabouts.

9. In short, I am aware of no individual or entity that is in communication with Mr. Hubbard or is aware of Mr. Hubbard's current whereabouts. Mr. Hubbard has no legal authority over any Church of Scientology and has not chosen to exercise any contact concerning even ecclesiastical matters with any Church for some time prior to August 21, 1984, the date of defendants' original deposition notice.

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~~Heber Jentzsch~~
Heber Jentzsch

Los Angeles, California.

Executed this 7th day of December 1984 at Los Angeles, California.

and correct.

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

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I, JOHN G. PETERSON, declare and say:

1. I am an attorney at law, duly licensed and authorized to practice before all courts of the state of California and the United States District Court of the Central District of California.
2. I represent the Church of Scientology of California as general counsel on civil litigation matters and submit this declaration in support of Plaintiff's opposition to defendants' motion to compel the deposition of L. Ron Hubbard. In my capacity as general counsel to the Church of Scientology of California, I am familiar with the corporate structure of the California Church as well as the corporate structures of all Churches of Scientology located in the United States. Moreover, for purposes of this declaration, I have made inquiries of corporate officers, representatives and staff members and have reviewed pertinent records of the Churches of Scientology throughout the United States.

DECLARATION OF JOHN G. PETERSON

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) DEFENDANTS.
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) DIRECTOR, FEDERAL BUREAU OF
) INVESTIGATION, et al.,
)
)
) v.
)
) PLAINTIFF,
)
) FOUNDING CHURCH OF SCIENTOLOGY
) OF WASHINGTON, D.C., INC.,

CIVIL ACTION NO. 78-0107

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

: submit this declaration for the purpose of demonstrating that Mr. Hubbard is not, and, at the time of the defendants' notices of deposition concerning Mr. Hubbard in this action, was not an officer, director or managing agent of any Church or mission of Scientology.

3. Although defendants in their memorandum in support of their motion to compel contend that the Churches of Scientology somehow lack corporate integrity, this is simply not the case and is directly contradicted by the facts. Each Church of Scientology is a separate and distinct legal entity with its own articles of incorporation and by laws which determines its own affairs through its duly elected Board of Directors and officers who exercise sole legal authority over these corporations. The Churches, of course, share the same religious creed and beliefs based upon Scientology Scripture created by the Founder of the Scientology religion, L. Ron Hubbard, and are affiliated in the ecclesiastical sense much like other religious institutions. However, in matters outside the religious sphere, these Churches exercise their own independent and distinct legal authority in running the day to day affairs of the corporation.

4. Mr. Hubbard is not an officer, director or managing agent of any Church of Scientology. Mr. Hubbard possesses no legal authority over these Churches and is not legally vested with any authority or power to act for or on behalf of the Churches of Scientology concerning any matter. Mr. Hubbard cannot bind any Church contractually nor in any other way legally obligate any Church

of Scientology. Mr. Hubbard also does not have any managerial duties whatsoever in connection with any of the Churches of Scientology. He is not a shareholder of any church corporation. He possesses no signatory power over any Church corporation or Church financial accounts and is not in any way authorized to obligate the Churches financially. Likewise, the Churches are not authorized to obligate Mr. Hubbard in any manner. Mr. Hubbard also does not possess any legal authority to hire or fire any individuals from any position within the Churches of Scientology. In short, there is no corporate action or function which Mr. Hubbard is empowered to perform.

5. The Churches of Scientology also possess no means to compel the presence of Mr. Hubbard at a deposition or to perform any other function on behalf of the Churches. If required to do so, the Churches would not be able to produce L. Ron Hubbard for a deposition.

6. I possess no knowledge of the current whereabouts of Mr. Hubbard and know of no one else who possesses such knowledge. Furthermore, I have made inquiries in order to determine whether any Church or any representative of any Church has communicated with Mr. Hubbard either directly or through intermediaries and I have determined that no such communications have been sent or received since well before defendants first noted Mr. Hubbard's deposition in this action on August 21, 1984.

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

Executed this 7 day of December, 1984 in Los Angeles, California.

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John G. Peterson
John G. Peterson

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CHURCH OF SPIRITUAL TECHNOLOGY

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EXHIBITS

SECTION C

RECEIVED
EXEMPT ORGANIZATIONS
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JUL 5 1986

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