

1
2 NURIK & KYLE, P.A.
3 Attorneys for Defendant
4 2937 S.W. 27th Avenue
5 Suite 203
6 Miami, Florida 33133
7 (305) 441-2400

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 CASE NO. CR-88-0616-DLJ

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 STEVEN FISHMAN,

15 Defendant.

16 _____
17 DECLARATION OF VICKI AZNARAN

18 I, VICKI AZNARAN declare as follows under penalty of
19 perjury:

20 I joined the Church of Scientology in 1972. In 1978,
21 after approximately four years as staff members, my husband
22 and I joined the Sea Organization. From 1978 to early 1987,
23 my husband and I worked most of our waking hours, with very
24 few days off, at our various assignments within Scientology.
25 I eventually became President of Religious Technology Center
26 and, supposedly, the top "ecclesiastical" authority within
27 Scientology. Richard was a high-level security officer.
28 During this period my husband and I became intimately
familiar with the structure and activities of various

1 Scientology organizations. Among other things, I was
2 briefed on and was sometimes a participant in meetings
3 involving litigation tactics and various means used to
4 attack and fight "enemies" of Scientology. In numerous
5 instances I was in the chain of command for approval for
6 such activities. From 1984 to 1987, I held the office of
7 Inspector General *one of the* highest worldwide offices in the
8 organization and so was privy to the most arcane practices
9 of the group.

10 The legal strategy of Scientology and the existence of
11 numerous potential legal problems, some of which are set
12 forth below, were known to me when I was a staff member in
13 Scientology. Enemies of Scientology are deemed to be
14 "suppressive persons" ("SPs"). One becomes a "suppressive
15 person" by doing a suppressive act, such as suing
16 Scientology as a litigant or lawyer. In the jargon of
17 Scientology, when one is "declared" this means that one has
18 been declared a "suppressive person" and, therefore, may be
19 harassed, hurt, damaged or destroyed without regard to
20 truth, honesty or legal rights. It is considered acceptable
21 within Scientology to lie, cheat, steal and commit illegal
22 acts in the name of dealing with a "suppressive person."

23 This practice or policy is sometimes referred to as the
24 policy of "fair game." In the jargon of Scientology, a
25 person who is "declared" is understood to be a suppressive
26 person. This means that the person is "fair game." The fair
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1 game policy was issued in the 1960s. It was never cancelled.
2 A document was issued for public relations reasons that
3 purportedly cancelled "fair game"; however, that document
4 stated that it did not change the manner of handling persons
5 declared "SP." In reality, the purported cancellation of
6 fair game is at most a matter of semantics. Enemies of
7 Scientology are treated as "fair game."

8 David Miscavige was the Chairman of the Board of Author
9 Services Inc., ("ASI") in 1984 and 1985. ASI was
10 incorporated to be the funnel through which profits from
11 Scientology were channelled to L. Ron Hubbard and,
12 therefore, it was very important within Scientology.
13 Miscavige represented Hubbard in all aspects of controlling
14 Scientology. He attended regular meetings with myself and
15 other top officials of Scientology organizations to review
16 the status of all Scientology's activities, including its
17 litigation and dirty tricks campaigns against Scientology's
18 enemies.

19 Because of my position and the regular reports that
20 came across my desk I know that throughout my presidency of
21 RTC that fair game actions against enemies were commonplace.
22 In addition to the litigation tactics described below, fair
23 game activities included burglaries, assaults, disruption of
24 enemies' businesses, spying, harassive investigations, abuse
25 of confidential communications in parishioner files and so
26 on. I specifically recall seeing one report regarding

1 attacks against Bent Corydon after Scientology became aware
2 that he was writing a book against Hubbard.

3 Other Hubbard writings encourage Scientologists to
4 pursue litigation purely for harassment without regard to
5 the merits of a claim to cause enemies to fold. Hubbard's
6 writings state:

7 "The purpose of the suit is to harass
8 and discourage rather than to win...The
9 law can be used very easily to harass,
10 and...will generally be sufficient to
11 cause [the enemy's] professional
decease. If possible, of course ruin him
utterly." Hubbard, "Magazine articles on
Level O Checksheet" American Saint Hill
Organization 1968.

12 As President of RTC and a Sea Organization member, I
13 attended meetings concerning the numerous legal actions
14 involving Scientology organizations. During this time
15 period, I had personal access to all legal documents having
16 to do with RTC. I received a report every day on my computer
17 that included a synopsis of each ongoing legal case
18 involving Scientology. I received, or so I was told, copies
19 of every major motion filed in cases involving Scientology.
20 I was on the "approval lines" for legal documents dealing
21 with RTC. During this time period, I had the option of
22 attending legal meetings, although some were mandatory. I
23 attended many litigation meetings and became generally aware
24 of Scientology's dirty tricks and legal maneuvers. On
25 specifics, I frequently deferred to in-house and outside
26 counsel; however, at least in theory, I was the head of RTC

1 and had access to any business or litigation "secrets" of
2 Scientology.

3 It is the stated policy and practice of Scientology to
4 use the legal system to abuse and harass its enemies. This
5 crude, fundamental directive of Scientology is no secret.
6 The policy is to do anything and everything possible to
7 harass the opposing litigant without regard to whether any
8 particular motion or maneuver is appropriate or warranted by
9 the facts or applicable law. That policy was followed in
10 every legal case I was involved with or learned about while
11 a member of the Sea Organization. The management of
12 Scientology consistently expressed and demonstrated a
13 complete disdain for the court system, viewing it as nothing
14 more than a method to harass enemies. Some examples of this
15 are set forth below.

16 During litigation between Gerald Armstrong and
17 Scientology, which was before Judge Breckenridge of Superior
18 Court for Los Angeles County, the court ordered the
19 production of Armstrong's pre-clear ("PC") folders. These
20 are files maintained by Scientology on those who submit to
21 interrogation sessions in a process called auditing. During
22 the course of that litigation I was ordered to go through
23 Armstrong's folders and destroy or conceal anything that
24 might support Armstrong's claims against Scientology. This
25 practice is known within Scientology as "culling PC folders"
26 and is a common litigation tactic employed by Scientology.

1 During other litigation in Los Angeles known to me as
2 the Wollersheim case, I was told that the judge had ordered
3 the production of Wollersheim's folders. As ordered, I
4 "culled" these files. In other words, I removed contents
5 that might have been damaging to Scientology or might have
6 supported Wollersheim's claims against Scientology. For
7 example, I removed evidence of events involving his family,
8 the anguish this caused him, evidence of disconnection from
9 family and evidence of fair game.

10 I was involved in numerous meetings concerning what is
11 known to me as the Christofferson case in Portland, Oregon.
12 This case was tried twice. In the first case, a Scientology
13 witness by the name of Martin Samuels was coached and
14 drilled for hours on how to lie convincingly or avoid
15 telling the truth. Before or during the second trial he
16 admitted to this course of conduct. In this litigation, a
17 Scientologist by the name of Joan Shriver produced
18 responsive documents that may have been incriminating. This
19 was a serious breach of policy for which she was punished.
20 These documents were ordered produced on such short notice
21 that apparently files were not thoroughly "culled." In
22 another case, an attorney was severely criticized and almost
23 fired for failing to properly coach and feed the desired
24 answers to Heber Jentzsch. Mr. Jentzsch was, for public
25 relations reasons, the purported head of the Church of
26 Scientology International. During his deposition, Mr.

1 Jentzsch was unable to answer fundamental questions
2 concerning the management of Church of Scientology
3 International.

4 In later 1979 and early 1980, there was a massive
5 document destruction program undertaken to destroy any
6 evidence showing that L. Ron Hubbard ("LRH") controlled
7 Scientology. I participated in this activity in Clearwater,
8 Florida and am informed that there was also intensive
9 document destruction at facilities in Gilman Hot Springs,
10 California. From at least that point onward there was a
11 continuous effort to hide or destroy any evidence of
12 Hubbard's control. For example, during an IRS investigation
13 in 1984 and 1985, while in bed with pneumonia, I was ordered
14 out of bed by Norman Starkey, who told me that they had
15 received a tip from a Los Angeles police officer advising
16 them of a pending IRS raid in Los Angeles. Mr. Starkey
17 ordered me to go to a computer facility and insure that all
18 information on the computers in Los Angeles that might show
19 Hubbard's involvement and control of Scientology's money was
20 destroyed except for one copy of each document. These copies
21 were to be saved on computer disks which were to be hidden
22 in secure storage places. At the time I was also instructed
23 to destroy anything that would show the control of Mr.
24 Starkey or Mr. Miscavige over Scientology.

25 In or about 1981, while working in a Scientology
26 organization known as the Guardian's Office, I had access to

1 and observed various written and oral communication
2 pertaining to illegitimate activities participated in by the
3 Guardian's Office. The Guardian's Office attempted to
4 infiltrate both governmental and private agencies including
5 the IRS, the Department of Justice, and the American Medical
6 Association and the National Institute of Mental Health. The
7 purpose of this was to steal documents pursuant to Hubbard's
8 "Snow White" program. The goal of this program was to
9 eliminate any negative reports about Hubbard and Scientology
10 that may have been held by these various agencies.

11 While involved in Scientology I became aware of various
12 operations directed against an author who had written a
13 negative book about Scientology. The author, Paulette
14 Cooper, was subjected to various forms of harassment. One
15 operation included an attempt to frame her. A false bomb
16 threat was written. Scientology agents lifted a fingerprint
17 from Cooper's apartment. These fingerprints were then
18 transferred to the bomb threat letter. Ms. Cooper was
19 subjected to an investigation and was not cleared until an
20 FBI raid resulted in the seizure of Scientology documents
21 that exposed the operation as a frame-up. There was at
22 least one other operation directed against Ms. Cooper. The
23 substance of it was to plant a boyfriend to reinforce and
24 play upon her suicidal tendencies in the hopes that she
25 would commit suicide.

26 In 1976 and 1977, the then-Mayor of Clearwater,

1 Florida, Gabe Cazares, was involved with litigation against
2 Scientology. Arrangements were made to have an attorney by
3 the name of Merril Vanniere, a Scientologist, represent Mr.
4 Cazares and sabotage his case. This plot was also exposed by
5 documents obtained in an FBI raid of a Scientology facility.
6 Also, in response to Mr. Cazares' litigation against
7 Scientology, an attempt was made to implicate Mr. Cazares in
8 a staged hit-and-run accident.

9 During an IRS criminal investigation in the 1984 to
10 1985 time period, the IRS ordered production of various
11 communications between Hubbard and Author Services, Inc.
12 (ASI). The ASI staff worked literally day and night for
13 several days reviewing documents so that unfavorable
14 documents could be destroyed or otherwise concealed from the
15 IRS. Lyman Spurlock and Marion M. Dendue, Scientologists
16 involved in this operation, informed me of this operation.
17 Also during this IRS investigation, my husband, Rick
18 Aznaran, was ordered to remove and conceal any incriminating
19 documents from certain locations. He was also directed to
20 make the computer network "raid proof." This involved
21 creating a system where incriminating documents could be
22 deleted from computer storage rapidly and before the IRS
23 could obtain control over the computers.

24 I have examined certain documents regarding Steven
25 Fishman's experience with Scientology, have had
26 conversations with Mr. Fishman's counsel, and have reviewed

1 the 1151-page autobiographical account of Mr. Fishman's
2 Scientology experience entitled "The Lonesome Squirrel."
3 Based upon my 15 years of experience in Scientology and my
4 review of the Fishman materials, I offer the following
5 conclusions:

6 1. I believe Mr. Fishman's assertions that he was a
7 member since 1979 and that he was as actively involved as he
8 states. This belief is based on my experience that only a
9 committed member of long standing would know the details of
10 the inner workings of the group; Mr. Fishman has such
11 knowledge. Awareness of certain confidential projects could
12 be achieved only by a member who was trusted by the
13 hierarchy; Mr. Fishman had such awareness. Involvement in a
14 group that thrives on secrecy and excludes most members from
15 participation in high-level projects means that any member
16 who exceeds a certain level of involvement enjoys the trust
17 of the leadership; such trust would be earned only by
18 extended membership. Mr. Fishman enjoyed that trust. His
19 accounts of meetings with high-level officials and his
20 knowledge of the operations and functions of the hierarchy
21 are so detailed and accurate that they couldn't have been
22 gained except through direct personal experience.

23 2. Refutation by Scientology officials of Mr.
24 Fishman's membership prior to February 8, 1986, and their
25 disclaimer of his involvement and their lack of any records
26 pertaining to such membership is perfectly consistent with
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1 their standard procedure in protecting themselves. As noted
2 above, I was personally involved in the destruction of
3 records when it suited their purpose. Scientology propounds
4 the belief that any action whatsoever taken to protect the
5 organization is justified, as the group takes precedence
6 over the individual. Any member performing criminal acts for
7 the benefit of the group was kept at arm's length; if
8 apprehended, the member was disavowed by Scientology. This
9 procedure was used even on the wife of the founder of
10 Scientology. Given the serious potential threat that Mr.
11 Fishman's defense posed to the group, I find Mr. Fishman's
12 account of certain members of Scientology's involvement in
13 the plan to fabricate the threats against Mr. Fishman and
14 his counsel and to thereby undermine Mr. Fishman's
15 credibility and render him useless as a witness against
16 Scientology to be consistent with their modus operandi.

17 I declare under penalty of perjury under the laws of
18 the State of Texas that the foregoing is true and correct.

19 Executed this 18th day of July, 1990, in Dallas,
20 Texas.

21 Vicki Aznaran
22 VICKI AZNARAN
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