

1 DECLARATION OF OMAR V. GARRISON

2 1. I am a professional author and journalist, who has
3 worked constantly at my profession since 1940, as foreign
4 correspondent, newspaper editor, and author of 14 published
5 books.

6 2. At various times prior to 1980, I was approached
7 informally by executives of the Church of Scientology and by
8 personal representatives of L. Ron Hubbard and asked to write a
9 biography of Mr. Hubbard.

10 3. In the middle of 1980 (about July, according to my
11 recollection; it could have been earlier or later), Mr. Hubbard's
12 personal representative, Laurel Sullivan, represented to me that
13 the biography project was being authorized by Mr. Hubbard
14 himself. I have in my possession an earlier memorandum, signed
15 by Mr. Hubbard, indicating his approval of my doing the project.
16 Also, Mr. Hubbard's personal attorney, Alan Wertheimer,
17 indicated that Mr. Hubbard was aware of the project and would
18 make himself available for interviews and discussions.

19 4. Before signing a contract to do the biography, I was
20 given a list of the biographical materials - letters, documents,
21 writings, etc. - which would be made available to me when and if
22 I undertook the biography. These materials, I was informed, were
23 from Mr. Hubbard's personal archives. Both Laurel Sullivan and
24 Mr. Hubbard's attorney discussed these materials with me, and it
25 was partly on that basis and representation that I signed a
26 contract with a Denmark corporation on October 30, 1980, to write
27 the book. Another important consideration which persuaded me to
28 sign the contract (which offered drastically reduced royalties to

1 me) was that a special, premium edition of the work would be
2 printed to sell for \$1,000.00 a copy, the proceeds of which I
3 would share with Mr. Hubbard. Another reason given me for
4 accepting a sub-standard contract was that the biographical
5 materials from Mr. Hubbard's private archives represented a
6 valuable contribution to the work, without which a widely
7 marketable biography would not be possible.

8 5. Mary Sue Hubbard was aware of the project and
9 corresponded with me about it and about the materials, which I
10 told her archivist Gerry Armstrong was providing me. I told
11 Mrs. Hubbard that he was performing an invaluable service. I
12 asked Mrs. Hubbard for a face-to-face interview, which she
13 declined with the excuse that security would not permit it. I
14 did not have any communication with Mrs. Hubbard after 1981
15 because I was informed that the Scientology organization was
16 refusing to pass on any communications to her.

17 6. Either Mrs. Hubbard's statement that L. Ron Hubbard
18 did not authorize the use of the archives is false, or the
19 representations to me - all to the contrary - were fraudulent.

20 7. After Gerry Armstrong left the organization, he
21 continued to work with me on the biography project because he was
22 the only person who appeared to know the materials well. He did
23 so at my request and was not paid for his service, which he
24 performed out of friendship and goodwill. His successor, Vaughn
25 Young, did supply me with some sensitive documents after Gerry's
26 departure, but he was unable to help me organize and cross-check
27 the material already in hand.

28 8. I was present when Gerry Armstrong went to the

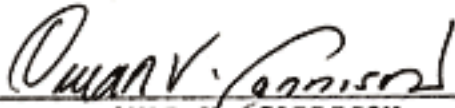
1 offices of the Scientology sect in the Cedars of Lebanon complex
2 and met with Mr. Hubbard's representatives, known as Commodore's
3 Messengers, from whom he requested the return of materials he
4 said they had stolen from him. He was refused the materials and
5 told to get himself an attorney.

6 9. It is my belief, understanding and conviction that
7 Gerry Armstrong was legally authorized to have custody of the
8 archival documents to assist me in the preparation of a biography
9 of L. Ron Hubbard.

10 10. I have no contractual relationship with the Church
11 of Scientology of California and, on information and belief, they
12 have no legal standing with regard to the documents from
13 Mr. Hubbard's private archives. Nevertheless, consonant with
14 their Fair Game Policy which they publicly renounced, but
15 privately have continued to this day, the Scientology cult has
16 mounted a campaign of harrassment against me and my friends,
17 apparently in the mistaken notion that they can exercise prior
18 restraint on a book, contrary to and in violation of the First
19 Amendment to the U.S. Constitution.

20 Executed this 18th day of April, 1983, at
21 Corona Del Mar, California.

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

24 
25 _____
26 OMAR V. GARRISON
27
28