

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.)

No. 157 680

DECLARATION OF
MALCOLM NOTHLING
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF MALCOLM NOTHLING

I, Malcolm Nothling, declare:

1. I am over the age of 18 years. I am a resident in Johannesburg in the Republic of South Africa. I have personal knowledge of the matters set forth herein, and if called upon as a witness herein I could testify competently thereto.

2. I am making this declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

3. I was an active member of the Church of Scientology from 1979 through 1986.

4. Appended hereto is a true and correct copy of an affidavit I executed November 11, 1992.

5. I am the plaintiff in the case of Malcolm Nothling vs. Church of Scientology, et al., Case no. 88/19221, in the Supreme Court of South Africa, (Witwatersrand Local Division), for defamation by Scientology and unsatisfactory services from the Scientology organization. I am the defendant in a case, the number for which I do not have to hand, brought by Scientology in the same Court. Scientology alleges in that case that I called its organization leaders trained liars.

6. My case against Scientology was at one time set to go to trial in August, 1991. Prior to that date I carried out a search around the world for anyone willing to testify about the policies and practices of Scientology, a central issue in my case. The only person I located throughout my worldwide search

1 who was willing to come forward and testify was Gerald Armstrong.

2 7. Mr. Armstrong did fly to Johannesburg, but did not
3 testify because the Scientology organization was able to obtain a
4 postponement of the trial.

5 8. Mr. Armstrong was willing to testify without payment of
6 any kind and he was not paid. I knew of the legal threat to Mr.
7 Armstrong should he testify on my behalf, and I am aware of the
8 threat Scientology is to him outside the legal arena. I am aware
9 of Scientology's vindictive, threatening and dangerous policy and
10 practice of "fair game," and in my personal experience I know Mr.
11 Armstrong is "fair game."

12 9. My family and I spent many hours with Mr. Armstrong
13 while he was in South Africa in 1991. I know he is a person of
14 sincere religious beliefs, and that he was willing to risk attack
15 from Scientology to testify on my behalf because of those
16 beliefs.

17 10. I have personal knowledge that Scientology claims that
18 all of its policies and practices, including that of "fair game,"
19 and other antisocial policies such as "Black Propaganda," "Attack
20 the Attacker," and "Use the Law to Harass" are "religious
21 scriptures."

22 11. I know from personal experience and my post-Scientology
23 study that Scientology practices a totalitarian kind of mind
24 control that is dangerous to society and individuals,
25 particularly our young people. I lost my first child to
26 Scientology's mind control, and I have two other young children,
27

1 so I am in a good position to know the danger.

2 12. I know that considerable information about
3 Scientology's mind control, policies and practices, and the
4 misrepresentations of L. Ron Hubbard, which Scientology uses to
5 pull people into its clutches, was made public for the first time
6 by Mr. Armstrong. This information is vital in freeing
7 individuals from Scientology's mind control.

8 13. Appended hereto is a a true and correct copy of
9 Scientology's "creed," on which it bases its claim that it is a
10 religion. I know that the "creed" is a sham. I know that
11 Scientology's management has never believed that all men have the
12 inalienable rights stated, but attacks ruthlessly anyone who
13 utters an opinion they do not like or speaks freely about their
14 "religious" policies and practices.

15 14. An immediate proof of that fact are Scientology's
16 attempts to silence Gerald Armstrong.

17 15. When I first became involved with Scientology I
18 believed its representations that it was in agreement with the
19 teachings of the Christian religion and that someone could be
20 both a Christian and a Scientologist. Through time it became
21 clear that these representations were lies, that the upper level
22 policies of Scientology taught that Christ and God are
23 electronically "implanted" ideas which aberrate and enslave
24 mankind, and that only Scientology's auditing has the way to
25 remove these "implants" from the mind of man.

26 16. In my experience Scientology's auditing does indeed
27
28

1 remove these ideas. But it leaves the individual who remains in
2 Scientology unfeeling, uncaring, aggressive and anti-Christian.

3 17. It is important for the future of the uninformed,
4 particularly the youth around the world that Mr. Armstrong remain
5 free to impart and discuss his knowledge of the urgent public
6 issues of the "religion" of Scientology.

7 I declare under the penalty of perjury under the laws of the
8 United States of America and South Africa that the foregoing is
9 true and correct.

10 Executed in Stourg, South Africa, this 2
11 nd day of April, 1995.

12
13 Malcolm Nothing
14 Malcolm Nothing
15
16
17
18
19
20
21
22
23
24
25
26
27
28