

FILED

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MARIN COUNTY CLERKBy NAUE Deputy

1
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6 In Propria Persona

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

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

12 Plaintiff,)

13 vs.)

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

19 Defendants.)
20)
21)
22)
23)
24)
25)
26)
27)
28)

No. 157 680

DECLARATION OF
LAWRENCE WOLLERSHEIM
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

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2 DECLARATION OF LAWRENCE WOLLERSHEIM

3 I, Lawrence Wollersheim, declare:

4 1. I am over the age of 18 years. I am a resident of
5 the State of Colorado. I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness I
7 could testify competently thereto.

8 2. I was an active member of Scientology from the
9 period of 1968 - 1969 through 1979 - 1980.

10 3. I am the plaintiff in the case of Wollersheim v.
11 Church of Scientology of California, Los Angeles Superior
12 Court No. C 332027. After a four and one half month trial in
13 1986 I was awarded a judgment against Scientology in the
14 amount of \$30,000,000.00. On appeal, the California Court of
15 Appeal upheld the judgment but reduced the damages awarded to
16 \$2,500,000.00. Wollersheim v. Scientology, 260 Cal.Rptr. 331
17 (1989), upheld by the United States Supreme Court.

18 4. I have also been sued twice by Scientology pursuant
19 to its "fair game" policy, Scientology v. Wollersheim, US
20 District Court for the Central District of California, No. CV
21 85-7197 JMI (Bx), which was dismissed against me, and
22 Scientology v. Wollersheim, Los Angeles Superior Court No. BC
23 074815. I was awarded \$135,000.00 in this frivolous lawsuit
24 pursuant to California's SLAPP Statute.

25 5. Since 1979, I have been the target of the notorious
26 "fair game" policy, originated by Scientology's founder and
27 leader L. Ron Hubbard. This policy calls for critics of
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2 Scientology, designated by the organization as "enemies" to be
3 tricked, cheated, sued and destroyed. This policy permits, in
4 fact urges, Scientologists to do virtually anything in the
5 service of Scientology to attack its targeted enemy.

6 6. In 1993 I, with others, formed a non-profit
7 corporation, FACTNet, Inc., a cult abuse victims advocacy
8 organization that serves as a library and historical
9 preservation archive which collects, preserves and makes
10 available information on groups and organizations which employ
11 sophisticated and dangerous techniques of mind control. For
12 more information on FACTNet, its goals and purposes, see one
13 of FACTNet's publication regarding its mission, history and
14 accomplishments appended hereto as Exhibit A. Because of my
15 experiences and knowledge of Scientology, because I have
16 continued to be its fair game target, and because it is widely
17 known as the largest and most psychologically dangerous of all
18 the organizations using advanced psychological coercion
19 practices, FACTNet has a large archive of information on
20 Scientology which it has collected, preserved and made
21 available to our library users.

22 7. In 1993 I asked Gerry Armstrong to be on the board
23 of directors of FACTNet. I did this because he is known to me
24 to be an abuse victims advocate, and honest and courageous,
25 having stood up against Scientology's fair game practices and
26 its formidable litigation machine for then over a decade, and
27 I trusted him. Armstrong was never involved in the management
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2 or operations of FACTNet in any significant way or for any
3 significant length of time. Later, because of the concern
4 that Scientology would mischaracterize Armstrong's
5 relationship with FACTNet, and use its mischaracterization in
6 legal attacks, he resigned his position on our board of
7 directors.

8 8. I also asked Armstrong to be involved with FACTNet
9 because he is a victim of Scientology's cult abuse and was,
10 and is, defending a case brought against him by Scientology to
11 silence him. I knew from having talked to Armstrong about his
12 pending case, and from reading many documents relating to that
13 case, and from my knowledge of Armstrong's prior history and
14 legal involvement with Scientology, that Scientology was
15 seeking to use the courts to silence him and deny him his
16 Constitutional rights, including his freedom of religion and
17 right and need to defend himself against fair game. I also
18 knew, from my own experience, study and communications with
19 dozens of people affected, that the "settlement agreement"
20 which Scientology was seeking to enforce was one of several
21 such "agreements," which, in my opinion, individually and
22 together constituted a massive obstruction of justice.
23 Armstrong, therefore, like any other Scientology victim, had a
24 need for FACTNet to help him defend himself against that
25 organization, and its litigation and fair game machines.
26 FACTNet has assisted Armstrong, because he is a victim of
27 Scientology's abuse. We have assisted him with fund raising,
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2 obtaining legal help, spiritual support, and in telling the
3 world the story of the abuse of Gerry Armstrong.

4 9. Appended hereto as Exhibit B is a true and correct
5 copy of one of FACTNet's research publications entitled
6 "Scientology's Policies Toward Its Adversaries." This
7 document details Scientology's history of unclean hands and
8 general bad faith in bringing actions such as this one.
9 Scientology has been involved in criminal acts against its
10 adversaries, and has used the court systems around the world
11 to support these criminal activities, for decades. If these
12 materials are fully read by the Judge and other decision-
13 makers in the current action, there will be no doubt about why
14 Scientology is trying to silence and crush Armstrong. Their
15 efforts to silence and crush him are to suppress critical
16 knowledge and counter-opinions about Scientology's nature and
17 activities, activities which threaten the public well-being
18 and safety.

19 10. The information that Armstrong brought with him out
20 of Scientology, that was made public for the first time
21 through his efforts, and became judicially credited during the
22 course of the first lawsuit Scientology brought against him,
23 has been essential to the understanding of Scientology's mind
24 control, fraud, and fair game activities. Armstrong
25 documented and exposed the real nature and history of L. Ron
26 Hubbard, his falsified credentials, vindictiveness and
27 aggressiveness toward anyone who opposed him, and his and his
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2 organization's victimization of countless people around the
3 world. Armstrong's material is used by government
4 investigations and by countless people around the world to
5 educate and counsel about Scientology and its actual
6 intentions, practices and dangers. Scientology wants to
7 silence and discredit Armstrong because his materials free
8 victims by giving them access to what they need to make
9 informed choices, and Scientology doesn't want its victims
10 free, but under its domination or shuddered into silence. It
11 is imperative, for free minds and a free society that
12 Scientology not be allowed to achieve its goal of suppression
13 of Armstrong's information.

14 11. I know that Scientology calls itself a religion,
15 claims that it is organized for only religious purposes,
16 claims that its activities are religious, and that all of its
17 writings on any subject with Scientology; whether they be
18 about financial matters, physical health or how to wash a car;
19 whether they order using the courts to harass people, to
20 utterly ruin critics, and even the "fair game" policy itself,
21 are "religious scriptures."

22 12. It has come to my attention that Scientology is
23 seeking to have the court in the Armstrong case order the
24 removal or seizure of all materials in FACTNet's possession
25 which relate in any way to Scientology. The order Scientology
26 seeks reads: "within 20 days of the issuance of this Order,
27 Armstrong shall: 1. Remove all information concerning
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2 Scientology, the Church and/or any person or entity referred
3 to in paragraph 1 of the "Mutual Release of All Claims and
4 Settlement Agreement" of December, 1986 from any and all
5 databases, electronic or otherwise, within the possession,
6 custody or control of FACTNet." This proposed order that
7 Scientology is trying to push through court against Armstrong
8 is an effort to deceive the judge on the case so that
9 Scientology can later use this overbroad order to harass, raid
10 and destroy a public library and historical preservation
11 archive. FACTNet's library and archive possess thousands upon
12 thousands of documents relating to Scientology and/or
13 Armstrong that have been or are legally in the public domain
14 and/or received from many other sources than Gerald Armstrong.
15 FACTNet possesses many of Scientology's own writings that have
16 been or are legally in the public domain. A court-ordered
17 removal or seizure of these materials, which Scientology
18 itself always claims are "religious scriptures" would be
19 tantamount to seizing Holy Bibles or commentaries on the
20 Bible, in the possession of out-of-favor former members of a
21 Christian church.

22 13. My 26 years of experience and my study of hundreds
23 of thousands of pages of evidence have brought me to the
24 unshakable conclusion that Scientology is the world's largest
25 secret neo-satanic "religion," with thousands of fanatical
26 members in hundreds of highly organized, centrally controlled
27 "churches" worldwide, using sophisticated mind control and
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2 intelligence operations and employing hundreds of non-
3 Scientology lawyers and "private investigators" to carry out
4 its goal of smashing all opposition to its mad and dangerous
5 plan for world domination. See "Scientology's Policies Toward
6 Its Adversaries," Exhibit B hereto.

7 I declare under the penalty of perjury under the laws of
8 Colorado and California that the foregoing is true and
9 correct.

10 Executed at 601 16th St, Jefferson
11 County, Colorado, this 7th day of April, 1995.

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14 Lawrence Wollersheim
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