

IN THE HIGH COURT      1987 C  
OF JUSTICE              No.6140

CHANCERY DIVISION

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA

Plaintiff

- and -

- (1) RUSSELL MILLER
- (2) PENGUIN BOOKS LIMITED

Defendants

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AFFIDAVIT OF  
SHEILA MACDONALD CHALEFF

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Solicitor for the Plaintiff

HANIDA JAFFERJI  
32 Stroud Green Road  
Finsbury Park  
London N4 3EA.



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Deponent: Sheila Macdonald Chaleff  
Deponent's First Affidavit  
Sworn on 5th October 1985  
In Support of Plaintiff

IN THE HIGH COURT OF JUSTICE  
CHANCERY DIVISION

1987 C No.6140



B E T W E E N :

CHURCH OF SCIENTOLOGY OF CALIFORNIA Plaintiff

- and -

(1) RUSSELL MILLER

(2) PENGUIN BOOKS LIMITED Defendants

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AFFIDAVIT OF  
SHEILA MACDONALD CHALEFF

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I, SHEILA MACDONALD CHALEFF, of Saint Hill Manor, East Grinstead, Sussex, MAKE OATH and say as follows:-

1. I have been a member of the Church of Scientology for the past 27 years. I have been employed by various Church of Scientology corporations for 17 years and am presently the Director of the Office of Special Affairs for the United Kingdom.

2. In 1985 Mr. Russell Miller approached the Church indicating

he was going to write a series of articles about the life of Mr. L. Ron Hubbard and the Church of Scientology. Mr. Miller gave all indications that his writings were going to be balanced and unbiased.

3. Shortly thereafter, it became apparent that Mr. Miller had other intentions and actually intended to write a biased and critical biography of L. Ron Hubbard.

4. I do not know the reason Mr. Miller decided to change his story or what his motive was.

5. I know from my vast experience working for the Church that L. Ron Hubbard led a very influential life and has greatly contributed to the well being of thousands of people. He dedicated his life to achieving "a civilisation without insanity, without criminals and without war, where the able can prosper and honest beings can have rights, and where man is free to rise to greater heights".

6. There is now produced and shown to me marked "SNC 1" a letter addressed to Alan Brooke, Managing Director of Michael Joseph. The letter was written by Mr. L. Fletcher Prouty. In this letter Mr. Prouty makes it clear that Mr. Miller has completely ignored the, in fact, indispensable facts regarding Mr. Hubbard's life, in particular Mr. Hubbard's extensive



with US naval intelligence during the Second World War and his early public exposure of federal government initiation and sponsorship of human experimentation in mind control through the use of drugs, electric shock and hypnosis. Mr. Prouty is a retired U.S. Air Force colonel who has extensive first hand personal knowledge of the activities and procedures of the U.S. military services. Mr. Prouty served in the U.S. Army from June 1941, the U.S. Air Force from its founding in 1947, the Office of the Secretary of Defense (OSD) -- Office of Special Operations (OSO/OSD), during 1960-61, and the Office of the Joint Chiefs of Staff (JCS), -- Office of Special Operations, during 1962-1963, where he was Chief of the office until his retirement in 1964. Mr. Prouty's experience includes service in the American theater of operations before the attack on Pearl Harbour (December 7, 1941), in the European-African-Middle East Theater (1943-44); and in the Asiatic Pacific theater of operations (1945). Mr. Prouty served on active duty with the U.S. Cavalry, the U.S. Armored Force, and with the U.S. Air Force where he was a pilot multi-engine and jet pilot. Mr. Prouty spent the last 5 years of his active duty service in the Pentagon.

7. It is evident to me since reading Mr. Miller's book that he chose to obtain his information from persons of questionable integrity. Two such persons who Mr. Miller gives extensive acknowledgement in aid of his book are called Jon Atack and G. Armstrong. Jon Atack is known to be a convicted drug possessor.



and was involved in distribution of materials stolen from the Church of Scientology. Mr. Armstrong is known to me to be a US government informant who has admitted on video tape that he intended to plant forged documents within the Church of Scientology and then using the contents to get the Church raided where these forged documents would be found and used against the Church. These are the same two individuals that Mr. Miller used to obtain the documents he used in his book.

8. On 11 August 1987, BBC Radio 4 aired a programme regarding L. Ron Hubbard and the Church of Scientology. This programme was researched and presented by Margaret Percy. After the airing of this programme, Mr. Atack wrote a letter to the "Radio Times" criticising Ms. Percy's programme even though he was a consultant to the programme. There is now produced and shown to me marked "SMC 2" a copy of Mr. Atack's letter to "Radio Times" with Ms. Percy's response.

9. The integrity of Mr. Miller and his sources of the documents in question are at best suspect. I have no doubt that the documents involved in this litigation were obtained in breach of court orders and the confidential relationship between the Church and Mr. Armstrong.

SWORN at  
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the 5th day of October  
Before me,  
Solicitor.

*Shula Chaloff*

