

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare

1. I am making this declaration to respond to the application (App.) of the Church of Scientology International, hereinafter referred to, along with the rest of Scientology's command and control structure, as "the organization," for an order to show cause why I should not be held in contempt of court, and to the declaration of Laurie J. Bartilson (LJB Dec.) dated December 31, 1992 on which said application is based.

2. Judge Breckenridge stated in his decision filed June 22, 1984, in the case of Scientology v. Armstrong, Los Angeles Superior Court No. C 420153, hereinafter referred to as Armstrong I, affirmed on appeal in Scientology v. Armstrong (1991) 232 Cal. App. 3d 1060, 283 Cal. Rptr. 917, that:

"[i]n addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the [organization] whom it perceives as enemies. The organization clearly is schizophrenic and paranoid..."

Ms. Bartilson is a member of the Scientology organization.

3. Ms. Bartilson states that on June 24, 1992 during a deposition in this litigation I asserted that I would never comply with the order of the Honorable Ronald M. Sohigian dated May 26, 1992, hereinafter referred to as the "Sohigian ruling,"

to him, get into his office by deception and steal his client files. The organization will do whatever it can to compromise me, any employer and any lawyer, and ruin any relationship of any kind I may develop with anyone. The organization's malice is certainly demonstrated in this effort to have me held in criminal contempt. Based on lies and perversions it wants me jailed for opposing its antisocial acts, and living my own life. I have no doubt that the organization leaders have plotted my assassination, nor that all my friends are at risk from the organization because of their association with me. I am working with Mr. Greene because he too is the target of this organization's attacks, because he understands, and because he too does not think much of organized evil.

10. Ms. Bartilson claims that my execution of proofs of service on July 30, 1992 in the case of Aznaran v. Scientology, US District Court, Central District of California No. CV-88-1786-JMI(EX) is an acknowledgement of my intention to wilfully disobey the Sohigian ruling (App. p.7, l.10; LJB Dec. p. 6, para. 11) It isn't. The Sohigian ruling is not intended to and does not prohibit such clerical tasks which can be done by anyone. Signing the proofs of service has nothing to do with my experiences in the organization, concerning which I can provide testimony to claimants and intended claimants only pursuant to subpoena. When I received and read the Sohigian ruling I sought to divine its meaning and apply it sensibly to my life, work and legal situation. If it meant precisely what it said then I would

have to stop breathing because by breathing I would be indirectly assisting any person litigating a claim against the organization entities referred to in sec. 1 of the settlement agreement. Obviously, therefore, Judge Sohigian did not mean what he stated. If he meant only that I could not, as opposed to passive assistance to litigating claimants such as breathing, living and writing magazine articles for the public generally, physically act to help such a claimant personally, I would have to ensure every little old lady or little old man I might escort across any old road was not such a claimant. I am certain Judge Sohigian did not intend that. Even an interpretation of the Sohigian ruling that I am prohibited from indirectly assisting any person litigating a claim against the organization entities in that litigation, in some way unrelated to my experiences in and potential testimony against the organization, leads to absurdities that Judge Sohigian also could not have intended. I recognized that the organization would interpret the Sohigian ruling in an absurd way because its way of interacting with me is crazy and its stock-in-trade is perversion of logic and truth; but I reasoned that I could not myself act in an absurd or illogical fashion and pervert truth out of fear of the organization's use of my God-given actions to attack me. Following Ms. Bartilson's tortured logic, if I got a job as a clerk in the LA Superior Court, for the rest of my life I would not be able to receive, stamp or file any document from anyone involved in litigating a claim against any of the organization

entities. Nor could I answer the phone if a lawyer for such a claimant or even his organization opponents called the Court. If I got a job as a postal carrier I would have to refuse to deliver mail to and from any such claimant. If I became a cab driver I would have to question all my fares and refuse to carry any claimant or his lawyers or witnesses on their ways to meetings, depositions and trials. If the same illogic were permitted in settlement agreements in all cases, and became anywhere near usual in the litigation industry, nobody in this great country could do anything for anybody for fear of violating some non-assistance covenant. The opportunities for unscrupulous groups like the Scientology organization would be fantastic, for anyone who signed such an agreement could be easily framed with settlement violations. Coupled with \$50,000-a-crack liquidated damages clauses the economic possibilities are Hubbardian in megalomagnitude. Trick the clerk into opening an envelope containing anti-organization litigation papers; con the cabby into driving the wrong person to a deposition; photograph the postman delivering something to a litigant. But I do not believe Judge Sohigian intended such an interpretation of his ruling, and I do not believe such non-assistance covenants or orders are legal or do anything but obstruct the administration of justice and attempt to destroy mens' souls. I believe Judge Sohigian intended only that I cannot make my organizational experiences, which are unique to me, available as testimony to claimants or intended claimants except pursuant to a subpoena. For seventeen

ruling and, although, as stated above, I believe that, even as I interpret and respect it, the ruling is illegal, I have not acted in any way in contempt of it. I believe that Judge Sohigian created with his ruling an invitation for me to appeal it, and provided within the ruling itself the appeal's grounds: its fuzziness, its contradictions, its departure from his hearing comments, its rewriting of the settlement agreement's prohibitions, and its statutory and constitutional violations. I believe Judge Sohigian's ruling strategically left the organization, because it escaped with sudden relief after the previous day's hearing in which he sharply censured its unsavory practices, unwilling to appeal the ruling. This unwillingness is something different from the organization's pattern of appealing everything that can be appealed, and strikingly so here because Judge Sohigian refused to enforce all but the narrowest slice of the settlement agreement, and even that he rewrote in my favor. I believe he offered the organization an opportunity to redeem itself and it is now clear that his offer has not been accepted. I respect Judge Sohigian's intellect and person and am thankful he heard the injunction aspect of my case.

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

Executed at San Anselmo, California, on February 2, 1993.



GERALD ARMSTRONG