

7507

1 HUB LAW OFFICES
 2 Ford Greene, Esquire
 3 California State Bar No. 107601
 4 711 Sir Francis Drake Boulevard
 5 San Anselmo, California 94960-1949
 6 Telephone: (415) 258-0360

7
 8 Attorney for Defendant
 9 GERALD ARMSTRONG

10
 11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 IN AND FOR THE COUNTY OF LOS ANGELES

13 CHURCH OF SCIENTOLOGY)
 14 INTERNATIONAL, a California)
 15 not-for-profit religious)
 16 corporation;)

17 Plaintiffs,)

18 vs.)

19 GERALD ARMSTRONG; DOES 1)
 20 through 25, inclusive,)

21 Defendants.)

No. BC 052395

DECLARATION OF GARRY L. SCARFF
 IN SUPPORT OF OPPOSITION TO
MOTION TO COMPEL

Date: February 19, 1993
 Time: 8:30 a.m.
 Dept: 30

Trial Date: May 3, 1992
 Discovery Cut-Off: None
 Motion Cut-Off: None

22 GARRY L. SCARFF declares:

23 1. My name is GARRY L. SCARFF. I live at 2137 N.E. Weidler
 24 St., Portland, Oregon 97232. My telephone number is (503) 281-
 25 9088. I am above the age of eighteen years old and provide the
 26 following testimony of my own first-hand knowledge. I could and
 27 would provide the same testimony in open court were I required to
 28 do so.

2. From 1982 through August 1992, I was a member of the
 CHURCH OF SCIENTOLOGY. For the two years preceding 1992 I was an
 operative of SCIENTOLOGY in the Los Angeles area where I have

1 worked closely with EUGENE INGRAM, a licensed private investigator
2 whose income is solely derived from SCIENTOLOGY.

3 3. EUGENE INGRAM, at the direction of SCIENTOLOGY, has
4 attempted to ruin FORD GREENE on a personal and professional basis
5 because of his activities on behalf of the Cult Awareness Network,
6 his outspoken and public criticism of SCIENTOLOGY, his
7 representation of former Scientologists, particularly Richard and
8 Vicki Aznaran, and his current working relationship with GERALD
9 ARMSTRONG, a former high-ranking Scientologist.

10 4. The operations against FORD GREENE are coordinated
11 through the CHURCH OF SCIENTOLOGY INTERNATIONAL in Los Angeles.
12 In this regard, I knew that the person who directed and controlled
13 these operations was DAVID MISCAVIGE, the head of Scientology.

14 5. In 1987 I was directed by SCIENTOLOGY to represent
15 myself as a survivor of the People's Temple immolation in
16 Jonestown, Guyana and befriend FORD GREENE in order to perpetrate
17 a Scientology operation on him. During Christmas 1987 FORD
18 invited me to spend the holiday with him. When I was in his
19 office alone during that period of time, I availed myself of his
20 confidential legal records, legal files of his clients, a rolodex
21 of his contacts and photographed his office.

22 6. In approximately September 1991 at a McDonald's
23 Restaurant located in Albany, Oregon, EUGENE INGRAM showed me a
24 letter to the Federal Bureau of Investigation which I read. The
25 letter from INGRAM stated that FORD GREENE was involved in the
26 trafficking of drugs and the misuse of his law office by trading
27 homosexual favors for the rendering of legal services. INGRAM
28 frequently discussed his desire to have FORD GREENE indicted under

1 the RICO statutes.

2 7. On or about December 20, 1991, I attended a meeting at
3 SCIENTOLOGY'S OFFICE OF SPECIAL AFFAIRS in Los Angeles where the
4 law offices of BOWLES and MOXON are located. Present at that
5 meeting were the following individuals: KENDRICK MOXON, TIMOTHY
6 BOWLES, RANDY SPENCER and ERIC MORAN, all of whom are attorneys at
7 Scientology's in-house law firm, BOWLES AND MOXON. Also present
8 were EUGENE INGRAM, and DAVID BUTTERWORTH, the director of
9 Scientology's OFFICE OF SPECIAL AFFAIRS. One purpose of this
10 meeting was to develop a plan to destroy the personal and
11 professional credibility of FORD GREENE and to continue attempts
12 to have him disbarred from practicing law because he represented
13 litigants against SCIENTOLOGY.

14 The operations that were proposed and developed at this
15 meeting included the following:

16 a. To create a public scheme portraying FORD GREENE as a
17 sex fiend. This was to be accomplished through EUGENE INGRAM'S
18 manipulation of Margery Wakefield, a former client of FORD GREENE
19 with a history of mental instability. INGRAM was to go to Florida
20 and dupe Ms. Wakefield into signing a declaration that would be
21 detrimental to FORD GREENE.

22 b. INGRAM asked me to execute a declaration stating that
23 when I stayed with FORD GREENE over the Christmas holidays in 1987
24 Ford induced me to get drunk on alcohol and stoned on marijuana at
25 which time INGRAM told me to state that FORD sodomized me and
26 forced me to orally copulate him. INGRAM also told me to state
27 that I did not admit to this in an earlier (false) declaration
28 because FORD was to have threatened to send his drug dealer

7510

1 contacts to kill me if I stated anything of the homosexual attack.

2 c. INGRAM also wanted me to swear that FORD GREENE was a
3 paying and frequent patron of a San Francisco bathhouse, that FORD
4 GREENE was infected with the AIDS virus, and was intentionally
5 passing it to others.

6 d. INGRAM also sought to expand on what he called the "fuck
7 buddy" relationship between FORD GREENE and GERALD ARMSTRONG. One
8 of INGRAM's suggestions was to set FORD GREENE up with a new male
9 client who then would provide a declaration swearing that GREENE
10 agreed to barter his legal services in return for sex.

11 e. Another of INGRAM's suggestions was that I go to San
12 Anselmo and break into and enter GREENE's office when he was not
13 present and plant cocaine and child pornography in his desk and
14 then advise the police of GREENE's illegal possessions.

15 f. Ingram also suggested tampering with FORD GREENE's
16 automobile by severing its brakes lines in order to produce a
17 serious accident. When I said to Ingram that it could also kill
18 GREENE, INGRAM responded, "There's no loss in a dead fag." INGRAM
19 also suggested orchestrating an accident involving GREENE on the
20 Golden Gate Bridge that would result in GREENE's car going over
21 the side of the Bridge.

22 g. INGRAM and SCIENTOLOGY have also attempted to have
23 GREENE disbarred by filing complaints with the State Bar.

24 8. At the instigation of EUGENE INGRAM, DAVID BUTTERWORTH
25 and the aforementioned attorneys in BOWLES AND MOXON I have
26 executed declarations in which I made false statements of fact.
27 With respect to FORD GREENE, the false statements of fact that I
28 made included, but were not limited to, the following:

1 a. FORD GREENE is a homosexual. The truth is I have no
2 basis for this statement;

3 b. FORD GREENE frequented the Castro Street area (a gay
4 area) in San Francisco. I have no factual basis for this
5 statement;

6 c. While nude FORD GREENE hugged me and would not let go.
7 This is false.

8 d. GREENE took a picture of me, naked, as I was leaving the
9 shower. This is false.

10 9. INGRAM, BUTTERWORTH and lawyers at BOWLES AND MOXON
11 repeatedly expressed that they would do anything to prevent GERALD
12 ARMSTRONG and FORD GREENE from working together.

13 Pursuant to the laws of the State of California, I hereby
14 declare the foregoing to be true and correct. Executed on
15 February 11, 1993 at Portland, Oregon.

16
17 
18 _____
19 GARRY L. SCARFF
20
21
22
23
24
25
26
27
28