

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

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  
MARGERY WAKEFIELD  
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                   DECLARATION OF MARGERY WAKEFIELD

3           I, Margery Wakefield, declare:

4           1.    I am over the age of 18 years.  I am a resident of  
5 the State of Florida.  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 a member of Scientology from 1968 to 1980.

9           3.    In 1982, I filed a lawsuit, Margery Wakefield v.  
10 Church of Scientology of California, United States District  
11 Court for the Middle District of Florida, Case No. 82-1313-  
12 Civ-T-10 for various wrongful acts committed against me.

13           4.    In settlement of that case in 1986 I had to sign a  
14 document which prohibited me from thereafter discussing  
15 Scientology with anyone.  I did not know that I was signing  
16 away such a right, nor that Scientology could later come after  
17 me with the aid of the courts to punish me for discussing my  
18 knowledge of the organization.

19           5.    After leaving Scientology I became a Christian.  I  
20 believe that I am saved by the Grace of God through my faith  
21 in His Son Jesus Christ.  I also believe that I was called to  
22 speak out concerning the illegal practices of Scientology, its  
23 mind control techniques, and its anti-Christian nature and  
24 teachings.  Appended hereto as Exhibit A is a true and correct  
25 copy of an essay I recently wrote entitled "What Christians  
26 Need To Know About Scientology."  I have been motivated in  
27 speaking my thoughts based on my knowledge and experiences by  
28

1  
2 the desire to reach the minds of people who are in Scientology  
3 and held by its anti-Christian mind control and pseudo-  
4 scientific dogma, and the minds of people who might be drawn  
5 into Scientology by its misrepresentations concerning its  
6 intentions, practices and religion. I believe that it is  
7 every Christian's motivation and desire to reach the unsaved  
8 with the message of the true gospel and a warning about false  
9 teachers like L. Ron Hubbard and false gospels like  
10 Scientology. I have felt that the right to speak and teach in  
11 this way is something that no court in this country should nor  
12 can take away.

13 6. I know that Scientology says it is a religion, that  
14 what it is engaged in is religious practice, and that all of  
15 its writings on Scientology are religious scripture. Even  
16 according to Scientology's use of the terms "religion" and  
17 "religious," therefore, I believe that under the US  
18 Constitution I would be free to speak and could not contract  
19 away my right to speak about those religious scriptures,  
20 practices and experiences. But I also believe that what I  
21 experienced in Scientology were my own religious experiences,  
22 and what I experienced regarding Scientology after leaving are  
23 my own religious experiences, about which I cannot be  
24 silenced.

25 7. Indeed, Scientology's attacks on me and its efforts  
26 to silence me after the "settlement" motivated me further,  
27 even at great risk to myself and my freedoms, to do what I had  
28

1  
2 been called to do. Appended hereto as Exhibit B is a true and  
3 correct copy of a document filed in my case in 1993 by  
4 Scientology entitled "Motion for order to show cause why  
5 plaintiff should not be held in criminal contempt." In this  
6 motion, which is still pending, Scientology seeks to have me  
7 jailed for up to twenty-two years for speaking about  
8 Scientology.

9 8. I want this court to know that I am at great risk in  
10 providing Gerald Armstrong with a declaration to support his  
11 opposition to Scientology's effort to silence him. I do not  
12 wish Scientology to further threaten or attack me. I believe,  
13 however, that everyone should be free to speak his thoughts,  
14 that the knowledge Armstrong has should not be silenced, and  
15 that the use of the courts by Scientology to silence its  
16 perceived critics, and thus be free to promote its anti-  
17 Christian religion should be opposed.

18 I declare under the penalty of perjury under the laws of  
19 the United States and California that the foregoing is true  
20 and correct.

21 Executed at Tampa, Florida this 7th  
22 day of April, 1996.

23  
24 Margery Wakefield  
25 Margery Wakefield  
26  
27  
28