

1                    SUPPLEMENTAL DECLARATION OF VICKI AZNARAN

2 I, Vicki Aznaran, declare:

3        1. I joined the Church of Scientology of California  
4 ("Scientology") in 1972, and was a member until I left in April  
5 1987. From 1984 until 1987, I was Inspector General of the  
6 Religious Technology Center, an affiliated Scientology  
7 organization. At that time, this was one of the highest  
8 worldwide offices in Scientology. One of my offices was located  
9 at 4751 Fountain Avenue, Los Angeles.

10       2. By virtue of my high position, I was "in the loop" to  
11 receive communications about some of Scientology's most secret  
12 operations. The facts set forth in this declaration are based  
13 on my own personal knowledge, which came from many sources,  
14 including numerous discussions and meetings with top Scientology  
15 "intelligence officials" and other Scientologists and reading  
16 documents which passed across my desk or came to my computer.

17       3. During the 1984-87 period, Scientology operated a  
18 number of "dirty tricks" operations out of the Office of Special  
19 Affairs (OSA), including one called MFTC (for "Mission Find The  
20 Crimes") and the "WOLLY" unit (which targeted Lawrence  
21 Wollersheim, his attorneys, and his case). The orders for these  
22 operations would go directly from OSA to private investigators,  
23 although Scientology deceitfully tries to cloak such operations  
24 under "attorney-client privilege".

25       4. MFTC and the WOLLY unit each had about 8-10 staff, and  
26 engaged in whatever dirty tricks were necessary to attack people  
27 and entities which were considered to be "enemies" of  
28 Scientology. The dirty tricks they used included destruction of

1 evidence, theft of documents, illegal surveillance or bugging,  
2 blackmail, bribery, physical assault and other intimidation,  
3 securing perjured testimony. MFTC's mission was to find or  
4 manufacture crimes for "enemies" of Scientology.

5 5. Before and during the trial in Wollersheim v Church of  
6 Scientology of California, MFTC and WOLLY ran a number of  
7 operations directed against Wollersheim, his counsel, and the  
8 Court. One of these operations was an attempt to put pressure  
9 on Bill Swearinger, the son of the trial judge in the Wollersheim  
10 case, based on his alleged homosexuality. The idea was to dig  
11 up, or manufacture (perhaps by setting the son up in a  
12 compromising sexual position with a minor boy), dirt on the son  
13 which could be used to pressure the Judge to rule favorably for  
14 Scientology, or else to get the Judge disqualified.

15 6. Attached as Exhibit A is a true copy of an internal  
16 Scientology memorandum, dated 6/21/86, which discusses this  
17 "Swearinger Investigation". I received a hard copy of this  
18 document at about that time, and I believe I also received a copy  
19 of this document on my computer. The Linda referred to on the  
20 first page is Linda Hamil, who at the time ran the MFTC. The  
21 Marty referred to on the first page is Marty Rathbun, a top  
22 Scientology "intelligence" official, who ran this operation.

23 7. Scientology's "ambush interview", discussed in Exhibit  
24 A, makes the Mike Wallace/60 Minutes interview called by the same  
25 name look tame. The "ambush interview" generally involves doing  
26 whatever it takes -- threats, physical force, bribery, or  
27 whatever -- to get an unprepared and unsuspecting target to say  
28 what is wanted.

1 8. I understand that Lynn Farny has submitted a  
2 declaration stating that Scientology complied with Judge  
3 Swearinger's order in the Wollersheim case to produce  
4 Wollersheim's pre-clear files. This is false. As I stated in  
5 my Fishman declaration, I personally culled and destroyed  
6 (shredded) from these files evidence which would help Wollersheim  
7 and hurt Scientology in the case. I was personally ordered to  
8 do so by David Miscavige, the head of Scientology, and Marty  
9 Rathbun. The culling and destruction took place at the Fountain  
10 Avenue building in Los Angeles. I was assisted in the document  
11 destruction by then Scientologist Jessie Prince. Lynn Farny was  
12 a low level Scientology official, and was not at the meetings  
13 where this was discussed. However, Lynn Farny is not telling the  
14 truth, because as a Scientology staff member he knows it is  
15 Scientology policy never to turn over information in litigation  
16 without first culling out (deleting and destroying) material that  
17 will harm Scientology. It is also, however, Scientology policy  
18 to lie to cover up such misdeeds.

19 9. Attached as Exhibit "B" to this declaration is a true  
20 copy of a document called "TR L", which is a Scientology training  
21 drill to teach Scientologists to lie convincingly.

22 10. I understand Scientology is trying to vacate  
23 Wollersheim's judgment on grounds that Judge Swearinger was  
24 biased against Scientology and his bias infected the jury. This  
25 is a typical Scientology tactic which it frequently uses in  
26 trials as insurance when Scientology loses an important case.  
27 Scientology will do things to set up a mistrial, such as calling  
28 jurors in the middle of the night and hanging up, threatening

1 them, etc. Then Scientology claims that it has been the victim  
2 of the opposition's dirty tricks and the jury has become biased  
3 against Scientology.

4 11. Scientology also ran operations against Wollersheim's  
5 counsel, Charles O'Reilly, and his law firm. This included  
6 bugging O'Reilly's house, placing an agent in the clerical staff  
7 in O'Reilly's law firm, and attempting to set him and his  
8 bodyguards up with girls. The purpose was to discover attorney-  
9 client strategy and secrets and get or manufacture information  
10 which could compromise O'Reilly.

11 12. Attached as Exhibit "C" is a true copy of portions of  
12 the transcript of my deposition on August 2 and 3, 1989, in RTC  
13 v. Scott and RTC v. Wollersheim, USDC-CDCal, CV 85-711 and 85-  
14 7197 JMI (Bx).

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

17 Executed this 29th day of June, 1993

18 Vicki Azarian  
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