

1  
2 Gerald Armstrong  
3 715 Sir Francis Drake Boulevard  
4 San Anselmo, CA 94960  
5 (415)456-8450

6 In Propria Persona

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 FOR THE COUNTY OF MARIN

9 CHURCH OF SCIENTOLOGY INTERNATIONAL, )  
10 a California not-for-profit )  
11 religious corporation, )

12 Plaintiff, )

13 vs. )

14 GERALD ARMSTRONG; MICHAEL WALTON; )  
15 THE GERALD ARMSTRONG CORPORATION )  
16 a California for-profit )  
17 corporation; DOES 1 through 100, )  
18 inclusive, )

19 Defendants. )

No. 157 680

DECLARATION OF  
DENNIS ERLICH  
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  
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

1  
2                   DECLARATION OF DENNIS ERLICH

3           I, Dennis Erlich, declare:

4           1.    I am over the age of 18 years.   I am a resident of  
5 the State of California. 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 member of Scientology from 1968 to 1982. I  
9 studied and was extensively trained in all of the bulletins,  
10 policies, directives, other writings and taped lectures, of  
11 Scientology's founder and leader, L. Ron Hubbard, concerning  
12 his psychotherapy ("auditing") and the training of  
13 Scientology's psychotherapists ("auditors"). In 1977 I was  
14 posted personally by Hubbard as the Chief Cramming Officer,  
15 Flag, responsible for the training and correction of the  
16 highest level auditors, training supervisors and "case  
17 supervisors," those people who directed Scientology's auditing  
18 of its members, in the whole Scientology world.

19           3.    During my time in Scientology I read and studied  
20 Hubbard's bulletins and other writings concerning Christ,  
21 Christianity and God. True and correct copies of two of his  
22 bulletins, "Routine 3 Heaven," dated May 11, 1963, and  
23 "Resistive Cases Former Therapy," dated September 23, 1968,  
24 are appended hereto as Exhibits A and B respectively.

25           4.    These bulletins are consistent with Hubbard's other  
26 writings for indoctrinated Scientologists on the subjects of  
27 Christianity and God. Hubbard taught that the ideas of  
28

1  
2 Christ, Heaven and God are electronically installed "implants"  
3 in humans' minds by "implanters" at "implant stations" for the  
4 humans' enslavement. Hubbard also taught that only  
5 Scientology could remove these implants and rescue humans from  
6 this religious enslavement.

7 5. Inside Scientology at the organizational level in  
8 which I worked, it was accepted that anyone who believed in  
9 Jesus Christ or God, or who prayed to a Supreme Being was  
10 dramatizing an implant. Such a person was considered a  
11 "former therapy case" or "resistive case." He was not trusted  
12 in the organization, and as long as he remained, the efforts  
13 of his auditor and case supervisor were to destroy his belief  
14 in his religion, Christ or God. Such a person, if he  
15 continued his belief in Christ or God, was labelled "PTS Type  
16 III," Hubbard's designation for a "psychotic."

17 6. Hubbard and Scientology claimed to Scientologists  
18 and to people considering buying "services" that he had  
19 discovered and developed his psychotherapy techniques through  
20 scientific research and that the promises of Scientology  
21 auditing; e.g., increased IQ, cure of diseases and increased  
22 abilities, were scientifically proven and guaranteed.  
23 Scientology also claimed and claims in the media and in the  
24 legal arena, in order to avoid liability for not delivering on  
25 its promises, that the organization is a religion organized  
26 solely for religious purposes. Scientology claims as well  
27 that everything written by Hubbard about Scientology,  
28

1  
2 including its financial and management policies, its  
3 intelligence training policies, its "black propaganda"  
4 policies directing and calling for character assassination,  
5 its policies calling for the use of the law to harass, and its  
6 policies calling for antisocial and criminal acts against  
7 critics, including Hubbard's "fair game" policy, are religious  
8 scriptures.

9       7. Scientology claims that the "fair game" policy was  
10 canceled and its practices, which included theft, trickery,  
11 cheating, lying, suing and destroying labelled "enemies" has  
12 been discontinued. It hasn't. I have been "fair game" for  
13 years. Scientology has carried out a black propaganda  
14 campaign to destroy my reputation, it has stolen my property,  
15 and it has sued me. Scientology, as presently directed by its  
16 leaders, has no respect for civil rights and is utterly  
17 ruthless in its efforts to crush, through financial, public  
18 relations, legal and extra-legal means anyone its leaders  
19 perceive as threats to their goal of world wide power.

20       8. I am familiar with the information about Hubbard's  
21 misrepresentations about his past and his promises, and some  
22 of the noxious practices of Scientology, which was made public  
23 for the first time through the efforts of Gerry Armstrong,  
24 particularly during his trial in 1984 before Los Angeles  
25 Superior Court Judge Paul Breckenridge. This information was  
26 important in my becoming free from Scientology's mind control,  
27 and I know it has been important for many others as well. I  
28

1  
2 am also familiar with Scientology's efforts to destroy  
3 Armstrong's credibility so he and his information would not be  
4 believed, and to silence him through the courts so that the  
5 organization could say whatever it wants about him without his  
6 being able to respond. This is what fair game is all about.  
7 It would be a black day for people of good will and free minds  
8 everywhere if Scientology is successful in these efforts.

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

11 Executed in GLENDALE, California this 6<sup>TH</sup>  
12 day of APRIL, 1995.

13  
14   
15 Dennis Erlich