

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
NANCY MC LEAN
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 NANCY MC LEAN

3 I, Nancy McLean, declare:

4 1. I am over the age of 18 years. I am a resident of the
5 Province of Ontario, Canada and I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness herein
7 I could testify competently thereto.

8 2. I am making this declaration in support of Gerald
9 Armstrong whom the Scientology organization is seeking by court
10 order to silence.

11 3. I am the Nancy McLean named in the Order in the case
12 Nancy McLean and John McLean v. Scientology, et al. in the United
13 States Court of Appeals for the Eleventh Circuit dated September
14 17, 1991, which the Scientology uses in its efforts to silence me
15 and other persons with knowledge of its practices. A copy of
16 this order is attached hereto as Exhibit A.

17 4. I was a member of Scientology in Canada from 1969
18 through October, 1972. During my time in Scientology I observed
19 considerable mistreatment of people and other organizational
20 illegalities. I wanted Scientology to thrive and brought my
21 concerns about these activities to the attention of seniors in
22 the organization, all the way up to Scientology's founder, L.
23 Ron Hubbard. My concerns were ignored, I was lied to, and I
24 left. I subsequently became a critic of Scientology's antisocial
25 and often criminal practices. As a result of my criticisms I was
26 declared an "enemy" and "fair game." The "fair game" policy,
27 which was written by Hubbard, calls for people designated as
28

1
2 "enemies" to be tricked, sued, lied to or destroyed." I am
3 intimately familiar with this obnoxious policy.

4 5. As result of its "fair game" attacks on me and my
5 family, I filed a lawsuit against Scientology in 1981. This
6 lawsuit settled in 1986. I agreed to the monetary figure
7 settling the case, but would not agree to the conditions
8 Scientology sought to impose which would have stripped my
9 personal liberties. I was, however, subjected to enormous
10 pressure by those with control of the case, whom I believe to
11 have been compromised by Scientology's fair game operations. It
12 was well known at that time that Scientology had attempted to
13 entrap and compromise a federal judge sitting on Scientology
14 cases, and to frame and compromise other government officials,
15 and had infiltrated legal offices involved in Scientology
16 litigation. Being put in a hopeless corner, and having no other
17 choice, I did succumb and did sign a "settlement agreement,"
18 which on its face prohibited me from discussing my experiences in
19 Scientology, Hubbard, and the "religion" itself, and prohibited
20 me from possessing its writings and counseling people concerning
21 these writings.

22 6. I knew at the time that this "agreement" was illegal
23 because it sought to keep me silent about the criminal past of an
24 organization with present criminal intent, and criminal policies,
25 which are a threat to decent people and civilized society
26 everywhere. I hoped that Scientology would discontinue its "fair
27 game" attitude and activities after the "settlement" and I hoped
28

1
2 for peace for all. I also felt and feel that I have a moral
3 obligation to counsel anyone who seeks me out concerning my
4 knowledge of the dangers of this organization. I continue to do
5 so, despite the risk its court orders and "fair game" activities
6 are to my freedom and life.

7 7. Since leaving Scientology, and through the years of
8 threats and attacks by this organization, a deep-felt spiritual
9 conviction has developed in me concerning the religious nature of
10 what I am involved in. Scientology claims that all of its
11 policies and directives, even those which order attacks on
12 critics, which call for using the legal system to harass innocent
13 people, which declare and label people "suppressive persons" and
14 "fair game," which assert that people it views as "low-toned"
15 have no civil rights, which state that some people have no right
16 to life at all, all of these and more, are "religious
17 scriptures." Scientology claims that all of its practices are
18 religious in nature and protected by the US Constitution and the
19 laws of every country granting religious liberty. Can,
20 therefore, my activities, in opposing such antisocial policies
21 and activities, be any less religious? Indeed, they are not! My
22 conviction that I should speak out for freedom and against
23 Scientology's tyranny, is as honestly held and as religious as
24 the conviction of Scientology's leaders to promote and enforce
25 their "religious" tyranny.

26 8. Scientology can no more prevent me, under the laws of
27 civilized nations, from possessing its "scripture," or commenting
28

1
 2 on or counseling people about these "scriptures," or Hubbard, the
 3 source of these "scriptures" than a Christian church can prevent
 4 me from possessing, commenting on or counseling people about the
 5 Holy Bible, Jesus Christ or God Almighty. I protest that
 6 Scientology is not a church, and antithetical to religion.
 7 However, as long as it claims to be a church and a religion, and
 8 obtains the extraordinary benefits conferred by our laws on
 9 churches and religions, it cannot silence me about its past, its
 10 leader, its policies and practices, or my experiences of any kind
 11 in it or in relation to it.

12 9. I am going to continue to speak freely to anyone who
 13 seeks me out about Scientology, despite any threat from any
 14 court, or from Scientology itself. I am going to freely possess
 15 its "scriptures" and writings about its "scriptures," despite any
 16 threat. I am going to counsel anyone who seeks me out concerning
 17 my knowledge of these "scriptures" and Scientology's "religious
 18 practices," and my "religious experiences."

19 I declare under the penalty of perjury under the laws Canada
 20 and the United States of America that the foregoing is true and
 21 correct.

22 Executed in Sutton West, Ont Canada
 23 this April 5th day of _____, 1995.

24
 25 
 26 Nancy McLean
 27
 28