

OLC CHRONO

FOIA
JimOLC 78-0684/1
17 February 1978

25X1 MEMORANDUM FOR: [REDACTED]
OGC/FOIA Division

25X1 FROM : [REDACTED]
OLC/FOIA

SUBJECT : Damage Suit - Scientology v. Director, FBI, et al

REFERENCE : OGC Memo 78-0912, dtd 14 Feb 78

1. We have checked OLC's limited indices, as well as the indices of the Review Staff material supplied to the House and Senate during their investigations of CIA, with negative results concerning the Founding Church of Scientology and its affiliated religious organizations.

2. Please note that OLC's indices do not contain the names of all persons and/or organizations of Congressional interest brought to our attention through correspondence or otherwise. Our indices only include names of those persons and/or organizations for reference purposes who appear to be of continuing interest.

[REDACTED] 25X1

Distribution:
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OLC:ME:jms (17 Feb 78)

OKC-78-0684

OGC 78-0912
14 February 1978

OGC

*Entire Pkg file in
Litigation*

MEMORANDUM FOR: See Distribution

STAT FROM :
Office of General CounselSUBJECT : Damage Suit - Scientology v. Director, FBI, et al.
Civil Action No. 78-0107 (U.S.D.C., D.C.)

1. The Church of Scientology has, after several previous filings and dismissals, arrived at a complaint which passes judicial scrutiny, and the case has been assigned to Judge Ritchey who has determined to move this matter with all possible speed.
2. Attachment 1 hereto is a Memorandum for the Record which summarizes Judge Ritchey's pretrial orders.
3. We have today, 14 February, received plaintiffs' interrogatories. Our answers must be submitted to the Department of Justice by 21 February. Thus, we must receive your input by absolutely no later than 9:00 a.m. on 21 February.
4. Since I was not responsible for the plaintiffs' original Freedom of Information litigation, and since that litigation was one of our earliest cases, we must request that you conduct a very thorough, current review of your records and provide any documents or information pertinent to the questions set forth in Attachment 2. Please note that documents in the original Freedom of Information litigation, whether released or denied, should be included in your response.
5. Further, please note that you are not requested to produce a legal document, rather your assistance is needed in developing the operative facts necessary for this office to respond.

6. We can not stress too strongly that Judge Ritchey is most serious about his requirement of complete and accurate responses and adherence to his time schedule. He has clearly stated his intent to impose sanctions (specifically, monetary damages) personally against those individuals who fail to comport with the order.



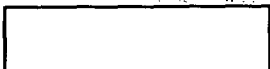
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Attachments

OGC/LSS/rsp

Distribution:

STAT

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LOS ANGELES TIMES
29 August 1978ARTICLE APPEARED
ON PAGE 3, 17Org. Scientology
~~Secured~~
Orig under Scientology

Scientology Flagship Shrouded in Mystery

Vessel Was Focus of Mutual Suspicion Between Church, Government

BY ROBERT GILLETTE
Times Staff Writer

On June 25, 1971, a young Colorado woman named Susan Meister died in an apparent suicide aboard the Apollo, the 3,280-ton flagship of the Church of Scientology and for nearly a decade the personal yacht of the church's founder, L. Ron Hubbard.

In mid-July that year, according to State Department correspondence obtained by The Times, Miss Meister's father traveled from Colorado to the Moroccan port of Safi, 125 miles south of Casablanca, where the Apollo was then moored, to inquire into his daughter's death. Meister is said to have questioned the explanation of the death proffered by the ship's officers, and indicated that he might seek an investigation of the Apollo.

In turn—according to a Nov. 11, 1971, letter from Assistant Secretary of State David M. Abshire to the Senate Foreign Relations Committee—the Apollo's port captain threatened in the presence of the American vice consul from Casablanca, William J. Galbraith, that "he had enough material, including compromising photographs of Miss Meister, to smear Mr. Meister first."

According to the Abshire letter, "Mr. Hubbard was apparently aboard the Apollo at the time of Mr. Meister's visit but declined to see him." Meister was said to have left Morocco the day before the threat was made.

No such smear occurred, and according to a church acquaintance of Miss Meister's who has since renounced Scientology, any such threat would almost certainly have been an empty one. "There was no way that girl could have been involved in anything compromising. She was very quiet, very nice," said the acquaint-

tance, who asked not to be identified.

The State Department letter also says that the same officer who allegedly threatened to "smear" Miss Meister told Galbraith—whom the officer had invited down from Casablanca—that "his organization, backed by money and friends in high places, 'would cause a nosy vice consul severe problems'" and that in Safi, where the ship was well liked, "Accidents could easily happen to people."

The Apollo's two senior officers then filed a formal complaint with the U.S. government, alleging that Vice Consul Galbraith had threatened them by saying that he could "get the ship sunk . . . by the CIA" or have it sabotaged "by getting a couple of bottles of Coca-Cola into the (engine) oil, or, even better, commercial diamond dust."

Galbraith said these allegations, contained in a notarized statement, were a "complete fabrication."

The incident at Safi appears to have marked a low point in a relationship between the Church of Scientology and American diplomatic outposts abroad that was generally characterized by mutual suspicion.

The church, for its part, suspected U.S. diplomats and intelligence operatives of fomenting trouble for it around the world. Government officials in turn expressed bewilderment at the sometimes eccentric behavior of the Apollo crew and wondered, in correspondence and cables to Washington, whether the ship might be a cover for illicit activities ranging from drug running to white slavery.

The 320-foot ship was purchased in the mid-1960s and sold about 14 months ago, according to church spokesmen. Built in 1937, it had once

served as a freighter and a ferry. Under the command of "Commodore" Hubbard, as he ranked himself aboard the ship, it became the headquarters and training vessel of his "Sea Org," an elite management corps in the church.

But over the years—as the Apollo plied a generally triangular course from ports in Spain and Portugal, south to Morocco, west to Madeira and back to the Iberian coast—the crew appears to have done its utmost to obscure its relationship with Scientology.

Sailing under Panamanian registry, the ship's owner was listed as the Operation and Transport Corp., Ltd., a Panamanian company. OTC, the crew consistently told skeptical press and local officialdom at its ports of call, was a secular business management training firm whose clients could not be divulged.

Adding to the aura of mystery, the ship transmitted coded radio messages to New York and points unknown and established land bases in Casablanca and Tangier, cities steeped in intrigue.

The Apollo appears to have done little to dispel the air of mystery about it.

In September, 1969, soon after the OTC established a land base at Tangier, the American consulate at Casablanca cabled an account of a visit aboard the ship, noting that "all concerned have been completely perplexed by the vagueness of the replies" to such questions as why the ship was operated and what its crew was training to do.

An Apollo brochure was said to explain that some 109 trainees aboard were learning "the art and the culture of navigation, the theory of which, when applied, demonstrates a very useful practice at sea."

Although the Apollo was registered in Panama and owned by a Panamanian company, the Panamanian consul general had no better luck in eliciting information. He found, the U.S. cable said, that the Apollo was "in a very bad state of repair" and believed that "the lives of the crew had been in jeopardy while the vessel was at sea."

"The Panamanian consul general has tried unsuccessfully to meet Commodore Hubbard, who has taken a suite at the El Mansour Hotel and has instructed the hotel personnel to refuse all telephone calls."

"It is possible that Commodore Hubbard and his wife . . . are philanthropists of some kind and/or eccentrics, but if one does not accept this as an explanation, there has to be some other 'gimmick' involved in this operation. What this gimmick might be is unknown here, although people in Casablanca have speculated variously from smuggling to drug traffic to a far-out religious cult."

WASHINGTON POST
26 October 1979

More Break-Ins Revealed In Scientology Spy Case

By Timothy S. Robinson

Washington Post Staff Writer

Church of Scientology spies committed scores of break-ins at government offices—including those of the Department of Justice and the Internal Revenue Service—in Washington and elsewhere to obtain secret files containing information about the church, according to evidence in federal court here yesterday.

Church operatives also infiltrated government agencies, such as the Drug Enforcement Administration and the Coast Guard intelligence service, to conduct their burglary, bugging and spying operation, the evidence said.

The Scientologist burglars would be given awards for their performances by the church, the evidence asserted.

The plot was directed by the church's highest officials in the United States and England, including Mary Sue Hubbard, wife of the church's founder, the evidence said. The illegal operations occasionally also were used to gather information about other groups, including the Unification Church of the Rev. Sun Myung Moon and the fundamentalist-oriented Bob Jones University, the government added.

The evidence, filed before U.S. District Judge Charles R. Richey, provides the complete details of the government's long-pending criminal case against the church's operatives.

It was filed as part of a rare procedure in a criminal case in which, instead of going through a lengthy trial, the defendants and the government basically agree to the general facts of the case and allow a judge to issue his findings on the basis of a stipulated record. The nine defendants in this case preserved their right

to have an appeals court review the legality of government's search of church property.

The defendants, including Hubbard, are scheduled to appear before Judge Richey at 10 a.m. today to hear the judge's final ruling in the case. He has previously enforced an agreement between the government and the Scientologists that states the defendants will be found guilty in that proceeding.

The president of the Church of Scientology, Rev. Kenneth Whitman, issued a statement last night saying it has "always been official church policy to uphold the laws of the land. The church did not and does not condone violations of this policy."

He said the nine defendants all were part of one of 21 departments within the church, and the church "cannot speak" for them in the criminal case.

The written presentation of evidence to the judge totaled 288 pages of legal-size paper, and was supported by a foot-high stack of documents seized in government raids on church locations two years ago.

While the evidence contains no allegations of crimes not mentioned in the government's indictment against the church, it provides huge amounts of details and a new perspective of the scope of the church's spying campaign against the government.

The evidence details how the church placed spies in the U.S. Department of Justice, the Internal Revenue Service, Coast Guard intelligence and the Drug Enforcement Administration, among other agencies. It tells of repeated break-ins, the use of an elaborate code system to transmit the results of the burglaries, and furtive meetings in low-priced Arlington restaurants.

In one short period at the IRS, the Scientology operative photocopied a 10-foot high stack of documents, the government said. At another point, the operatives were told to rifle IRS files in a campaign to "use any method at our disposal to gain our non-profit [tax exempt] status," the government continued.

The plan called for the documents obtained in the burglaries—including a break-in at the Deputy Attorney General's office in the main Justice Department building—to be used for several purposes, including being leaked to the press to embarrass the agencies involved.

In one instance, the church placed an electronic listening device in the conference room of the chief counsel's office of the IRS in the main IRS building on Constitution Avenue NW, the government said.

A church operative from Los Angeles was flown to the District with a bugging device, the government continued. The spy broke into the conference room and plugged the device into a wall socket to monitor a planned discussion of IRS actions involving Scientology, the government said.

-As the meeting was in progress, three members of the Church "overheard and taped the entire meeting over the FM radio" of their car parked in the driveway of a nearby Smithsonian Institution museum, the evidence continued.

After the Nov. 1, 1974, meeting ended, the church spy reentered the room, removed the bugging device, and took papers that had been left there by participants in the meeting, the government said. Apparently, building guards did not unduly impede this on any other operation described in the evidence.

According to documents obtained by the government under search warrants, the church itself recognized the illegality of bugging conversations.

A church official in the United States wrote to a church official in England that "we best be careful with this transcript as even in the distant future in the hands of the enemy the repercussions would be great. There are new laws on this federally and a strong post-Watergate judicial climate," the government evidence disclosed.

Another seized church document outlines the view of church members that they knew they were committing serious crimes, the government continued. The evidence quotes at length from the document, which discusses one member's legal research and concludes that the stealing of government documents and the copying of them on government photocopy machines "is a felony."

One internal church memo quoted by the government lists burglaries the Scientologists had committed at the Department of Justice, the Internal Revenue Service, the Treasury Department's office of international operations, the Post Office, the Labor Department's national office, the Federal Trade Commission, the U.S. Customs Building, the Drug Enforcement Administration, the American Medical Association's law firm offices here, and the Washington office of a law firm representing the St. Petersburg Times.

The government also quoted another Scientologist document suggesting a list of 136 agencies—including the Central Intelligence Agency, the FBI, and several U.S. embassies and consulates abroad—to be infiltrated in the future. There is no indication that plan was carried out.

Written in a narrative, chronological form, the compilation of evidence against the nine church members list break-in after break-in, beginning with a church directive that such tactics were acceptable to locate government documents because the "legal route is at best lengthy."

The church has said in the past that any actions its members might have taken were a result of more than 20 years of harassment of the church by the same government agencies they are now accused of infiltrating. The church has filed numerous civil lawsuits under the Freedom of Information Act to obtain files it said have been kept on the organization.

The government said in its evidence that the program of burglaries was often used to circumvent the normal course of those lawsuits.

The evidence cites one occasion when a government attorney filed an index with a court to show what documents were being withheld under formal claims of FOIA exemptions, only to have the Scientology burglars use the same document to help them conveniently and covertly snatch the material from his office files.

When some government agencies moved files to more secure, locked areas the Scientologists again brought in a member from Los Angeles to teach the spies here how to use devices to pick locks, the evidence continued.

The operation produced such mounds of materials at one point that the church complained internally about the cost of photocopying materials, the government said. The spies then focused on using government photocopying machines instead, the evidence continued.

As with most spy operations, this one had its lighter moments. At one point, the burglars were caught in the act by a cleaning woman at the IRS who became suspicious and called the security guard. The security guard was satisfied with the burglars' faked IRS credentials and convinced the cleaning woman to open the door for them, and she did so on several subsequent occasions.

The evidence recounts another incident in which a church spy worked for 1½ hours unsuccessfully attempting to pick a lock at the IRS, and then hit the door in exasperation. The door popped open with the single blow, the evidence said.

Much of the church's spying activities were focused on the IRS, which has been locked in combat with the church for years over its tax status. At one point, according to the evidence, seven different scientologists possessed faked IRS credentials they made by breaking into the room in which such credentials routinely were made for actual IRS employees.

One-sided Scientology series

To the Editor: The Church of Scientology's response to the Los Angeles Times series recently run in The Minneapolis Star was to immediately file a multimillion-dollar civil suit against the writers of the articles.

An objective view of the articles by anyone who knows a Scientologist could clearly see that the reporting was so one-sided and filled with government unsubstantiated allegations that it could only have been written to justify the largest attempt by the U.S. government to annihilate a religion that has been perpetrated in recent times.

The Church of Scientology has been one of the largest users of the Freedom of Information Act (FOIA) and has received thousands of documents over the last several years that paint a picture of the considerable effort made by various government agencies to attempt to discredit the church through the circulation of false reports, both in this country and around the world. The series of articles from the L.A. Times is such an example, as the writers spent only 11 hours with church members while spending over three months with government and government-related individuals in preparing the story.

The series attempts to play down the campaign run by these various agencies against the church, but the roots of this battle with the government agencies stems from a direct conflict in the basic tenets of the church and the government agencies. This can be seen by the following example:

In 1950 L. Ron Hubbard published his book, "Dianetics, the Modern Science of Mental Health." The book gained wide approval among the American public, as it contained a workable approach toward helping individuals understand themselves more and therefore become happier and more free. This book was a best seller for months and Dianetic groups sprang up all over the country. The government, though, took a dimmer view of the book, and the reasons why were not discovered till a bit later.

Seems that the various governments in 1950 wanted the technology of Mr. Hubbard for their own. The Russians offered \$200,000 a year and Pavlov's laboratories. The U.S. government made similar offers. All were turned down as Mr. Hubbard felt that his work would be perverted if under their control. This proved to be correct as in the

various governments were hard at work with projects aimed at mind control. In the U.S. these were led by the psychiatric profession, the CIA and other governmental agencies.

In Minnesota the attacks on Hubbard's work started to come after his refusal to play ball with these groups. In fact, the attacks came from the same sources. In 1951 it was Dr. Hastings at the University of Minnesota psychiatric department who led the attack. Later, in 1977, it was found through use of FOIA that Hastings and the university psychiatric department had been involved in mind control experiments, including the use of shock, LSD and other drugs under the MK ULTRA program financed by the CIA. In fact, Hastings worked for the CIA back in the 1940s. Thus it seemed that if the government agencies and those bent at controlling man could not control Mr. Hubbard's work they would fight to destroy it.

From this point, 117 attempts to infiltrate the church have been documented. Many examples of false reports being circulated, surveillance, and illegal seizure regarding the church have been also documented.

The church has withstood many attempts by government agencies and government-connected groups and individuals to cause difficulties for the church, all at an enormous cost and all based on the false re-

ports started and kept in the files of various governmental agencies.

We filed a class action damage suit in 1977 against several agencies, and we will be using the courts to gain access to files that are being withheld from the church even now. We have learned to be persistent and continue to fight back to get all the information on the table so that correct decisions can be made and the church allowed to be represented by what it is rather than by some old falsehood in a file being circulated years after it's been disproved, which has been the case.

The "mystery of Scientology," as The Star's headline calls it, is not because of some hidden data by the church, but is caused by the circulation of false reports that give the illusion that there is something secret about the church. The Church of Scientology has remained constant throughout in its fight for human rights and individual freedoms. We are dedicated to this purpose and our work stands open to all those who wish to view it for themselves. Do stop in sometime and look and see what is here for yourself, as only what is true to yourself is what is true.

—(The Rev.) Kerry Fuller,
Minneapolis.

Editor's Note: The writer is resident director of the Church of Scientology of Minnesota.

Customs Agents Upheld in Seizing Scientology Papers

Tribunal Rejects Church Arguments That Law Is Not Valid and Search Warrant Is Required

BY ROBERT RAWITCH

Times Staff Writer

U.S. Customs Service officials did not violate constitutional guarantees against prior restraint of speech when they temporarily detained and reviewed thousands of documents sent to Los Angeles by the Church of Scientology in England two years ago, a three-judge federal panel has ruled.

The unanimous opinion written by U.S. Dist. Judge William P. Gray held that a federal statute prohibiting importation into the United States of written material advocating treason, forcible resistance to any federal law or threats to harm or kill anyone is constitutional "when properly construed and applied."

After the July 3, 1976, detention of its documents, the Church of Scientology attacked the statute as overbroad, a prior restraint on speech and void because of vagueness.

Even if the statute was valid on its face, the church contended, customs officials should not have been able to review the internal church documents extensively without a search warrant. Among the documents were communications with church attorneys and purported confessional statements of Scientology members.

The three-judge panel, which included U.S. Dist. Judge Warren J. Ferguson and 9th U.S. Circuit Court of Appeals Judge Stanley N. Barnes, rejected each of the Church of Scientology's contentions.

Customs officials at Los Angeles International Airport, where the four boxes of documents were intercepted, testified at hearings that the material initially was detained when an inspector routinely scanning the documents saw references to the CIA, Interpol, debugging, decoding machines and sabotage.

Inspector Larry Hoyle also said he read a sentence in a document about an individual who the document said "doesn't have a criminal record because they don't know that he killed his wife." The individual referred to was not identified in court records.

The documents detained were returned to the church but Gray allowed copies to be made of those the government believed were potential evidence of a crime.

Ultimately, only four documents were copied, one of which was a handwritten letter dated in early 1975 by a Scientologist in Great Britain proposing use of an "agent to penetrate" the U.S. attorney's office in Los Angeles to obtain files on the church.

The letter, which has never been released publicly, was summarized by church attorney H. Peter Young in a pleading filed with the court.

The church attorney said the government had made "no showing whatsoever that this letter was anything more than a misguided fantasy by a single individual."

The letter was never communicated to anyone, Young added, and it lacked initialed approval by church leaders in Great Britain and the United States.

Eleven U.S. Scientology leaders and two living in England were indicted this summer in Washington, D.C., on charges of conspiring to infiltrate and burglarize government offices.

The judges' opinion obtained Tuesday stated. "Under the Customs Service's broad powers to restrict imports and conduct a search of materials entering the country from abroad, this temporary delay and retention of documents (10 days) does not constitute a constitutional deprivation."

On the issue of whether a search warrant should have been obtained by customs officials after they had determined the documents were importable, the panel held none was necessary because officers have the right to seize any evidence of a crime that is in plain view during a search conducted in good faith.

There was no evidence of bad faith by the custom officials, the judges said.

A church of Scientology spokesman said no determination had been made on whether to appeal the three-judge panel's decision. However, spokesman Jeff Dubron added:

"These government agents are the proud possessors of a repressive law that allows them at will and with no due cause to go through any and all possessions of American citizens entering the United States.

"Much like the Internal Revenue Service, customs is an ideal agency of political expediency. The American public should be aware that here is an agency that is not bound by the spirit of the Constitution."

"We asked the court to strengthen the Fourth Amendment rights of all American citizens. True to trend, the rights of the citizen have once again lost to the demands of the state."

ORC Scientology
SACU.OC.1 Bomb
(orig under Scientology)

Scientology Flagship Shrouded in Mystery

Vessel Was Focus of Mutual Suspicion Between Church, Government

BY ROBERT GILLETTE
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At times the Apollo and OTC appear to have deliberately teased the curiosity of diplomatic officials.

From Tangier in February of 1971, American Consul General Howard D. Jones wrote to the U.S. legal attache in Madrid of a puzzling social encounter with someone from the OTC.

"I recently met at a social function a young, American lady associated with this new enterprise," Jones wrote.

"She introduced herself to an American standing with me in this way: 'I am Meredith Thomas, I am here with a Panamanian corporation, and that is all I can tell you.'"

"The air of mystery on the good ship Apollo . . . may not mask any illegal activity; still, I thought it worthwhile to check," Jones said.

Fourteen months later, the U.S. consulate at Tangier dispatched a lengthy cable to Washington reflecting a mixture of bemusement and bewilderment at the semi-clandestine activities of Scientology in Morocco.

The April 26, 1972, cable from Tangier said:

"Little is known of the operations of (the) Operation and Transport Company here, and its officers are elusive about what it does. However, we presume that the Scientologists aboard the Apollo and in Tangier do whatever it is that Scientologists do elsewhere.

"There have been rumors in town that the Apollo is involved in drug or white slave traffic. However, we doubt these reports . . .

"The stories about white slave traffic undoubtedly stem from the fact that included among the crew of the Apollo are a large number of strikingly beautiful young ladies. However, we are skeptical that a vessel that stands out like a sore thumb, in which considerable interest is bound to be generated, and with a crew numbering in the hundreds, would be a reasonable vehicle for smuggling or white slaving."

"On an extended cruise through the Caribbean in the summer of 1975, rumors of illicit or clandestine activity followed the Apollo from island to island like seagulls behind a fishing smack.

In September, 1975, the American Embassy in Trinidad cabled in a local news roundup to Washington that the "controversial yacht Apollo seems to have worn out its welcome in Trinidad."

Stories in a weekly tabloid called The Bomb connected the ship with Scientology, told the story of a leading local Calypso singer named Lord Superior who had joined the church and then rejected it, and in the end "appear to have soured the previously enthusiastic attitude of Trinidadians toward the Apollo."

The Bomb also speculated that the ship was linked to the CIA and Sharon Tate murders in Los Angeles. That led to a libel action by the Church of Scientology.

U.S. Charges Scientology Conspiracy

II. Church Agents Accused of Spying, Bugging and Theft

By Timothy S. Robinson
Washington Post Staff Writer

Eleven high officials and agents of the Church of Scientology, including the wife of founder L. Ron Hubbard, were charged here yesterday in an allegedly widespread conspiracy to plant spies in government agencies, break into government offices, steal official documents and bug government meetings.

Much of the evidence outlined against the church's officials in the 28-count criminal indictment appears to be based on the church's own internal memorandums and other documents. The memorandums directed church operatives to "use any method" in its battle with the government.

Church spies were used, according to the indictment, to find out about Scientology's tax-exempt status, rummage through government files to get information on the church and on persons or groups it perceived to be its "enemies." They were also used as an "early warning system" to protect Hubbard from government scrutiny, the indictment alleged.

Assistant U.S. Attorney Raymond Banoun asked that arrest warrants be issued immediately for the church's Worldwide Guardian, Jane Kember, and her chief aide, Morris (Mo) Budlong, in England, and said extradition proceedings against them would begin soon.

The other indicted church members, including Commodore Staff Guardian Mary Sue Hubbard, the wife of the founder, are scheduled to appear in federal court here at 1 p.m. Thursday. Banoun said he had been assured by attorneys for those church members that they would appear as scheduled.

A spokesman for the church, which is described in its literature as an "applied religious philosophy which believes that man is a spiritual being and is basically good," said the indictment is the latest episode in nearly 30 years of harassment against the church by government agencies.

"... If justice is done our members will be exonerated as any have been who have fought for religious-freedom against government oppression throughout history," said the church's Deputy U.S. Guardian Henning Heldt, who was among those indicted yesterday.

The indictment charges that the church's "guardian office" included a bureau that "was assigned the responsibility for the conduct of covert operations," and that all of those charged with crimes were members or officials of that bureau.

The church said, however, that the guardian office is the "social reform arm of the church." Church attorney Phillip J. Hirshkop described the indictments as part of a "bureaucratic vendetta against Scientology" and said "any actions attributable to church members is a direct result of government misconduct."

The 42-page indictment, one of the longest returned by a grand jury here in recent memory, climaxes a sometimes bizarre investigation that began when two Scientology operatives were confronted by FBI agents in June 1976 in the federal courthouse here after employes became suspicious of their regular nighttime presence.

The two men, who had entered the building by using allegedly forged Internal Revenue Service passes, were allowed to leave. Unknown to the agents at the time, the two were part of the alleged undercover Scientology operation and had been assigned to the courthouse to enter offices there and copy documents, according to the indictment.

The two men then fled to California and with Scientology officials concocted a cover story to explain their presence in the courthouse, according to the indictment. One of them, Gerald Bennett Wolfe, returned to the courthouse here a year later and pleaded guilty to using fake IRS credentials. He was placed on probation.

The other alleged courthouse intruder, Michael Meisner, had been hidden by the church in Los Angeles for more than a year, having had his appearance changed and using a false name, according to the indictment. When he threatened to return to Washington against the church's will, he was held under guard and his "bodyguard crew" was told to "gag, handcuff" him if necessary, the indictment continued.

Meisner escaped from his guards in June 1977 and came to Washington, where he agreed to plead guilty to a five-year felony. He is the government's main informant against the church, and is being held under tight security.

When he came to Washington, Meisner outlined the alleged Scientology infiltration plot in great detail to federal agents and they obtained a search warrant for the church's headquarters in Los Angeles and Washington. Those warrants were executed on July 8, 1977, and resulted in a massive seizure of church documents that reportedly outlined a campaign of harassment and infiltration directed against numerous individual critics of the church as well as against government officials and agents.

According to the indictment returned yesterday, the alleged criminal conspiracy by the church began on Nov. 21, 1973, when Kember directed Heldt and his staff to obtain all Interpol (the international police organization) documents concerning Scientology and Hubbard.

Meisner was brought into the plot in mid-1974 when he was told by a superior, Cindy Raymond, that he was to help her place a "loyal Scientology agent" as an IRS employe in the District of Columbia, the indictment stated. Raymond, identified as the national secretary of the church's U. S. information bureau, was among those charged yesterday.

Kember issued another order, known in church terminology as Guardian Program Order 1381, in October 1974, directing the infiltration of the tax division of the Justice Department, according to the indictment.

Two of those who received that order, Deputy Guardian-Information U.S. Richard Weigand and Deputy-Deputy Guardian U.S. Duke Snider, also were charged in yesterday's criminal conspiracy.

CONTINUED

Within days of that order, according to the indictment, three Scientology agents planted an electronic listening device or "bug" in an IRS conference room here and "recorded" an IRS meeting concerning Scientology's application for tax-exempt status and related matters." Less than 18 days later, Wolfe was employed as a clerk-typist at the IRS.

One of the agents who allegedly planted the bug, Mitchell Herman (also known as Mike Cooper), also was charged yesterday. At the time of the alleged offense, his title with the church was Branch I director of the Guardian's office, D.C.

Once Wolfe was in place at IRS, the indictment charged, he began stealing IRS documents that would then be flown out to the church's top officials in the Los Angeles area.

Among the IRS offices from which Wolfe stole documents were the chief counsel's office, that of an assistant IRS commissioner, and other lawyers, according to the charges.

In May 1975, Wolfe also turned his attention to the tax division of Justice and stole documents from the offices of three attorneys there as well, the indictment charged.

Mary Sue Hubbard then told Kember and Heldt on May 27, 1975, to "use any method at our disposal to win the battle and gain our nonprofit (tax) status," according to the charges. Gregory Willardson, then the Church's Information Bureau Branch I director in the United States, soon wrote a letter to Meisner asking him to prepare a plan to get further IRS documents, the indictment stated. Willardson also was charged yesterday.

Six months later, an order known as the "Early Warning System" was issued by the church hierarchy, and it was "designed to protect the 'personal security' of" L. Ron Hubbard, the indictment stated.

"The order called for the infiltra-

tion of government agencies which had power to subpoena or bring suits against Hubbard or which would possess advance warning of such subpoenas or suits," the indictment continued.

The indictment said that as the plot continued:

- A Scientologist, Sharon Thomas, was placed in a job at the Justice Department as a secretary and stole documents from an attorney's office there.

- Guardian's office officials met in Los Angeles to discuss the burglaries, the infiltrations, and documents obtained by Scientologists.

- Meisner and Wolfe forged IRS credentials and used them to break into the offices of Assistant U.S. Attorney Nathan Dodell at the U.S. Courthouse here.

- Meisner and Wolfe broke into the offices of Associate Deputy Attorney General Togo G. West Jr. and Special Assistant to the Assistant Attorney General for Administration John F. Shaw and stole documents from both places.

- Even after charges were filed against Wolfe and Meisner in connection with the alleged illegal use of IRS credentials, the church tried to implement what it called "Project Troy." That project reportedly called for the installation of a permanent "bug" in the IRS chief counsel's office, and was approved by Heldt on Dec. 20, 1976.

- In May 1977, the church again called for the infiltration of the U.S. Attorney's Office in Washington "for the purpose of obtaining information about any potential legal action against L. Ron Hubbard."

All of the defendants except Wolfe

and Thomas are charged with one count of conspiracy to steal government documents, burglarize government offices, intercept oral communications and forge government passes; 10 counts of theft of government property, one count of intercepting oral communications; 10 counts of burglary, and one count of conspiracy to obstruct justice, to obstruct an investigation, to harbor a fugitive, and to make false declarations before a grand jury.

The second conspiracy count with which those persons are charged deals with the church's alleged attempt to block any detection by the government of the infiltration plot, and to stop Meisner from going to Washington against the church's will.

Much of the planning concerning the alleged harboring of Meisner came directly from Mary Sue Hubbard, according to the indictment. At one point, she reportedly asked for a listing of all the buildings he had illegally entered for the church.

Her last instructions about Meisner mentioned in the indictment came on July 3, 1977, when he had already fled the church. In a letter to Heldt, she directed the church to "utilize resources to figure out a way to defuse him (Meisner) would he turn traitor," the indictment said.

Wolfe was charged with the conspiracy to obstruct justice count; five counts of theft of government property; six counts of burglary, and four counts of making false declarations before a grand jury. Thomas was charged with the conspiracy to break into government offices, three counts of theft of government property and two counts of burglary.

All of the defendants except Kember and Budlong live in the Los Angeles area, according to the government.

FEDERAL PROSECUTORS UNVEIL THE ASTONISHING INTRIGUES OF THE SCIENTOLOGY CHURCH

Since its founding by a science fiction writer named L. Ron Hubbard in 1954, Scientology has been among the growth stocks on the self-help market: a quasireligious, quasiscientific cult that has attracted three million U.S. followers (some highly touted celebrities among them) and estimated annual revenues in the hundreds of millions, much of it tax-exempt. Until recently Scientology's only certifiable vice was eccentricity, but within a week a federal grand jury in Washington is expected to hand down a bulging sheaf of indictments. They will charge some of the sect's highest officials with, among other things, burglary, obstruction of justice, wiretapping, harboring a fugitive and conspiracy. Federal grand juries already sitting in New York and Florida are considering other charges.

It all began, like Watergate, with an alert Washington guard—a night watchman at the U.S. Courthouse who became suspicious of two frequent after-hours visitors making liberal use of Xerox machines. They were copying what prosecutors now allege were an assistant U.S. attorney's files on Scientology suits against government agencies. The men had gained admittance with forged and borrowed IRS identification cards, but by the time the FBI had sorted out the case and issued arrest warrants, they had fled to the West Coast. At that point, prosecutors charge, an elaborate cover-up began in the Los Angeles office of Henning Heldt, Deputy Guardian of the Scientologists in the U.S.—and, as such, the head of the church in this country. A year later Michael Meisner, once the fifth highest Scientology official in the U.S., called Washington, confessed to being one of the late-night thieves and offered to turn state's evidence against other church elders. He said they had kept him under house arrest, gagged and handcuffed him, and repeatedly and aggressively "audited" him (the church's word for counseling).

The tale Meisner told was a chilling narrative of the church's attempts—through harassment, intimidation, infiltration and other forms of espionage—to gain advantage in numerous lawsuits against individuals and government agencies involving millions of dollars. On the basis of his story, more than 150 FBI agents armed with search warrants and crowbars raided Scientology headquarters in Washington and Los Angeles July 8, 1977. After 23 hours they left with an astounding haul, including lock picks, pistols, ammunition, knockout drops, a blackjack, bugging and wiretapping equipment, even a small vial labeled "vampire blood." They found documents apparently taken from the private files of federal prosecutors, correspondence between U.S. Cabinet members, and church memoranda on producing false identification papers, tailing people, laundering money and committing blackmail. Among the 23,000 documents the FBI impounded were files presumably snatched—either by employees or burglars who were Scientologists—from the Federal Trade and Atomic Energy Commissions; the National Security, Defense Intelligence and Central Intelligence Agencies; the Departments of Labor, the Army and the Navy; the U.S. Customs Service; Interpol, and numerous U.S. police departments.

When asked about this prodigious cache, Guardian Henning Heldt retreats into evasive martyrdom. "I think the issues are larger than what was in the inventory," he says. "There is the big issue of why the government has been trying to wipe out a church for 20 years."

The government charges that the Scientologists had more in mind than self-defense, that the raid turned up evidence of a "policy aimed at the elimination of individuals who were enemies of the church"—and one hatched as early as 1974 in the innermost sanctum of worldwide Scientology. The church is now said to be run by Mary Sue Hubbard (husband L. Ron has ostensibly retired) from a 57-acre estate in East Grinstead, Sussex, England (and once from a fleet of church-owned ships at sea). But it fell to an elite few of the church's 214 ruling "guardians" in the U.S. to carry out the alleged operation—and to Heldt, as chief U.S. Guardian, to supervise it.

Many of its apparent targets were critics of Scientology with no connection to government agencies involved in lawsuits with the church. Several "enemies lists" were found among the seized documents (containing such names as Sen. Edward Kennedy and Judge John Sirica), as well as hundreds of dossiers on "suppressives," church jargon for critics. These included broadcasters, writers and publishers of critical observations on Scientology, as well as the American Medical Association (whom they allegedly infiltrated with an agent code-named "Sore Throat"), Better Business Bureaus, several foundations and law firms and dozens of politicians. The documents suggest that the church resorted to harassment, intimidation and outright defamation of several individuals—and U.S. Attorney Raymond Banoun, who will prosecute the case in Washington, counts himself among them. "Numerous people have posed as government investigators," he says, "trying to find out my personal habits and background. That's happened all over my neighborhood. My car also caught fire recently. [U.S. Attorney] Earl Silbert has ordered an investigation of that."

Perhaps no critic of the church has suf-

CONTINUED

ferred more than New York free-lance writer Paulette Cooper, author of a 1971 book titled *The Scandal of Scientology*—and the target of a church operation code-named "PC Freak Out." Her publisher withdrew *Scandal* and destroyed most copies almost as soon as it was printed—in the face of defamation suits in five countries seeking \$15 million damages. But, according to a suit Cooper plans to file after the federal indictments are announced, the church continued for years afterward to press a smear campaign bent on putting her "in a mental institution [or] in jail." To that end, she charges, church members followed her, stole her diary, threatened her with a gun, lifted files from her psychiatrist and her lawyer, wrote anonymous "Dear Fellow Tenant" letters saying she was a sexual deviant with venereal disease—and framed her on federal charges of making bomb threats against the church. (They wrote the threats to themselves on her stationery, which they had stolen.) Charges were eventually dropped when she passed a seven-hour sodium pentothal test, but she had to spend \$28,000 to defend herself and \$4,000 on psychotherapy to cope with the stress. "At one point I was down to 83 pounds," she remembers. The recently seized church documents may well support her latest suit against the church—for \$40 million in damages—but she still lives like a fugitive, using the service elevator in her New York apartment and wearing dark glasses and disguises.

Gabriel Cazares, the former mayor of Clearwater, Fla., believes he has been another target of church harassment. Cazares began to speak out against Scientology when the sect bought a hotel and a bank building in his town to house its new international advanced training center. "They lied about their purpose in being here," he says, "disclaiming that they had any connection with Scientology." To discredit him, he charges, Scientologists circulated petitions for his resignation, sent members disguised as reporters to his Texas hometown to look into his past, spread implications that he was born out of wedlock and finally circulated an anonymous letter accusing him of involvement in a hit-and-run accident. The church filed two suits against him in 1978 seeking \$3 million in damages. Three weeks ago a Florida judge dismissed one as "without basis" and the other has been

withdrawn. Cazares and his wife, how-
 countersuits. "We've got a good case," he says. "When the dust settles, it will be clear that we had in our midst an organization that was involved in a political movement, an action so bizarre that it's difficult to believe. The nature of this cult is ruthless."

Deputy Guardian Henning Heldt, 33, a Cornell graduate and once an aspiring artist, is the man prosecutors say was responsible for directing the church's covert operations in the U.S. Heldt will not comment on specific charges. "As part of fighting a criminal case, one should keep his cards close to his chest until you get to the table," he says. He describes his church responsibility as "social reform and rehabilitation." He is also the overseer of all 2,795 U.S. staff members, supervisor of the 38 American churches and the custodian of the revenues collected in this country. A self-described hard-nosed businessman, he is happy to say business is good. "The church's secret," he says, "is: one, don't spend more than you take in; and two, deliver what you promise—and in a volume necessary to stay solvent." Legal fees for the California church alone doubled last year (to \$1 million) and may well double again, but Heldt says that is just the price of doing business. "The legal costs act as an unlegislated tax," he says, "a tax you've got to pay to keep going."

In the face of his own serious legal problems, Heldt is remarkably, almost eerily, calm. "You know," he says, "the guys who have done the most are the ones who have taken the most heat—Martin Luther King and so on." He lives handsomely but quietly in the Hollywood Hills with his wife, Mary, 32, and their daughter, Letty, 9. He explains away two karate and judo experts who live downstairs as roomers, but will admit to other precautions. "I don't put anything in letters," Heldt says, "and I'm relatively certain that our phones have been tapped. We spend thou-

sands and thousands of dollars for people to sweep our phones [for bugs], but there are no guarantees."

Otherwise, he says, life goes on very much as before: He does wood sculpture in the garage, jogs weekends with Mary (she does two miles to his six) and usually works 12-hour days for the church. Mary is also an official, bringing home a little less than Heldt's reported \$8,500 a year. Every day each parent spends an hour with Letty "doing whatever she wants within reason," as Mary Heldt puts it. The child is working her way toward a level of understanding of church philosophy called "clear," but, she says, "I'm in the middle of a drug rundown now." It is an attempt, her mother explains, to determine how drugs she took for an operation affected her thinking.

Heldt's official response to government charges is an all-out, if vague, counteroffensive. "We're in the business of reforming political corruption," he says. "The government is worried about having its secrets published. We feel a very major issue is the people's right to know and the right to do something about it." He cites the church's extensive use of the Freedom of Information Act to pry loose some government documents legally and the enterprise of the church newspaper, *Freedom*, which he says has unearthed others—"and they're not saying where." Heldt will admit only to being tough—not wrong. "We've stepped on lots of people's toes," as Mary puts it. "Because we are effective, we may appear to be a threat."

CHERYL MCCALL

OR 97 Scientology

Scientology group searches for corruption

By DICK STANLEY
American-Statesman Staff

Attention: city, county, state and federal employees who want to snitch on your bosses about inefficiency, waste or outright criminal fraud, the American Citizens for Honesty in Government is waiting for your confidential call.

It may be wiser, though, to send your photocopied documents through the mail, anonymously. Because if you call, you and the organization may not be the only parties on the line.

The honesty unit is a 4-month-old creation of the Church of Scientology. For at least two decades the church has been a frequent target of federal investigative agencies, including the FBI.

The other day in her new office at 3011 North Interregional, Debbie Sharp laughed easily and lit her third cigarette in twenty minutes. The 26-year-old director of the group sipped a soft drink between puffs and finished a light-hearted tale about being followed across Texas last month by two men in dark business suits.

Sharp and her staff of two were touring Texas cities, standing in front of local federal buildings wearing cardboard Uncle Sam hats and whistles around their necks.

They were passing out leaflets urging federal employees to become "whistleblowers" on waste and corruption in government. The men in dark suits stood nearby, watching, said Sharp, and, on the highway they followed the trio by car.

"We tried to talk to them a couple of times," said Sharp with a wry grin, "but they wouldn't talk. Once, on the road, we slowed to force them to pass. We waved but they didn't wave back."

Her grin was accompanied by a steady, self-assured gaze directly into her visitor's eyes. She used to be a Scientology recruiter, signing up people for self-improvement courses run by the ecumenical "church" that says it has 4 million members worldwide, about 2 million in the United States and about 10,000 in Austin. Now the Waco native, a Southwest Texas University dropout and daughter of an oil company engineer, is starting her first fraud investigation.

"It came from a federal employee we met on the tour," she said. "The lady said she'd been waiting a long time to expose it. We'll check it for accuracy and if it's legitimate, turn it over to the proper legal authorities for prosecution and the press for public exposure."

And if the authorities need a little encouragement, she said with a grin, "we might release it to the press at the same time."

Sharp's lack of investigative experience doesn't faze her. There is the church to turn to for legal advice and the Washington, D.C., office of the honesty group. The Washington office is taking on the CIA and the Drug Enforcement Administration.

The group says the CIA probe concerns "a score of former charter airlines owners" who say they have been forced out of business by CIA-owned airline companies. The drug agency matter, says the group, is a spin-off of a Justice Department report alleging, among other things, an agency plot to murder the president of Panama.

If the honesty group is new to the snooping business, the Church of Scientology has a long history of it, apparently born as long ago as 1954 when the church's application for tax-exempt status ran into federal opposition.

The status eventually was approved but the Food and Drug Administration spent another 10 years hauling the church in and out of federal court. The issue was statements of success for a simple electrical device (called an E-meter) used in church self-improvement courses. The courses cost money, hence FDA's concern. The issue was never resolved and the church still uses its E-meter.

Deep into the FDA fight, the church set up a tabloid newspaper called *Freedom*. It lists a circulation of 350,000. It does a lot of investigative reporting, much of it directed at the federal government.

Last summer, more than a hundred FBI agents staged raids on the church's Washington and Los Angeles offices. Thousands of church-related documents were seized, including some confidential files on the tabloid's sources of information. The FBI said the church and its newspaper had "illegally" obtained some government documents, including material on the CIA, FBI and IRS.

Sharp's Austin office makes the Texas capital one of 20 cities in nine states with a government honesty office "drop" for sensitive government materials and information. The church goal is a nationwide "network" to accommodate government "whistleblowers."

Funding is slight: It comes from \$10 annual memberships, mainly from Scientologists. Sharp says the Texas branch has 150 members.

APU Scientology



Central Intelligence Agency
Washington, D.C. 20505
(703) 351-7676

Herbert E. Helu
Assistant for Public Affairs

28 February 1978

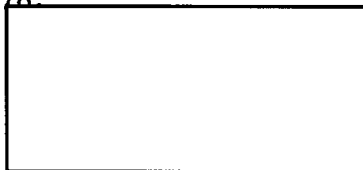
MEMORANDUM FOR:
Office of General Counsel

STAT

FROM : A/DCI/PA

SUBJECT : Damage Suit - Scientology vs.
Director, FBI, et al, Civil
Action No. 78-0107 (USDC, DC)

A search was made of our files for any substantive papers of any consequence regarding the Church of Scientology. A negative response was given to Mr. Strickland via telephone on 21 February 1978.



STAT

OGC 78-0912

14 February 1978

MEMORANDUM FOR: See Distribution

STAT FROM :
Office of General Counsel

SUBJECT : Damage Suit - Scientology v. Director, FBI, et al.
Civil Action No. 78-0107 (U.S.D.C., D.C.)

1. The Church of Scientology has, after several previous filings and dismissals, arrived at a complaint which passes judicial scrutiny, and the case has been assigned to Judge Ritchey who has determined to move this matter with all possible speed.

2. Attachment 1 hereto is a Memorandum for the Record which summarizes Judge Ritchey's pretrial orders.

3. We have today, 14 February, received plaintiffs' interrogatories. Our answers must be submitted to the Department of Justice by 21 February. Thus, we must receive your input by absolutely no later than 9:00 a.m. on 21 February.

4. Since I was not responsible for the plaintiffs' original Freedom of Information litigation, and since that litigation was one of our earliest cases, we must request that you conduct a very thorough, current review of your records and provide any documents or information pertinent to the questions set forth in Attachment 2. Please note that documents in the original Freedom of Information litigation, whether released or denied, should be included in your response.

5. Further, please note that you are not requested to produce a legal document, rather your assistance is needed in developing the operative facts necessary for this office to respond.

6. We can not stress too strongly that Judge Ritchey is most serious about his requirement of complete and accurate responses and adherence to his time schedule. He has clearly stated his intent to impose sanctions (specifically, monetary damages) personally against those individuals who fail to comport with the order.





STAT

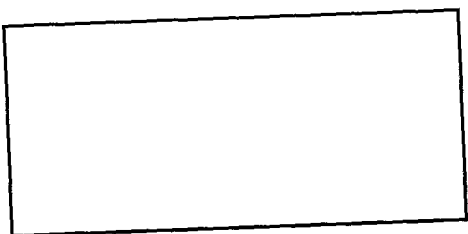
Attachments

OGC/LSS/rsp

Distribution:

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- 1 - 
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- 1 - C/OS/SAG
- 1 - D/OP
- 1 - Executive Secretary
- 1 - OLC/FOIO
- 1 - OGC/Exec. Officer
- 1 - D/NFAC
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- 1 - OGC

TRANSMITTAL SLIP		DATE
TO: PAB/FOIO		
ROOM NO. 1F04	BUILDING Hqs.	
REMARKS: 		
FROM:		
ROOM NO.	BUILDING	EXTENSION

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FORM NO. 241 1 FEB 55 REPLACES FORM 36-8 WHICH MAY BE USED. (47)

MEMORANDUM FOR THE RECORD

STAT

FROM :
Office of General Counsel

SUBJECT : Scientology v. Kelley, et al., (damage action)
Department of Justice Meeting of 2 February 1978

A new complaint has been filed in this litigation and a status call was held on 1 February 1978. Judge Ridey stated that:

- The case would move very rapidly,
- No continuance,
- USG to file responsive pleading within ten days,
- USG to file interrogatories by 13 February 1978 limited to 20 questions,
- Plaintiff to have ten days to answer,
- Plaintiff also to file interrogatories by 13 February 1978 and also limited to 20 questions,
- Will meet with plaintiff's counsel within ten days for informal exchange of information and prepare statement of undisputed facts,
- Plaintiff must file jurisdictional statement with legal memorandum as to each claim and
- If plaintiff desires jury trial, he must make demand within ten days and submit all jury instructions.

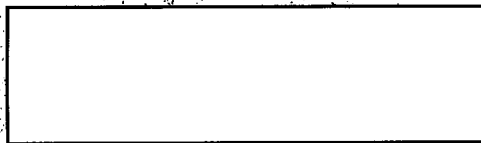
The Department of Justice will:

- File Motion to Dismiss on grounds that plaintiff failed to exhaust administration remedies,
- Will need affidavits in support by 7 February 1978 and
- Will begin drafting Answer to B complaint and our interrogatories immediately.

Messenger to pick up interrogatories on Monday, 13 February 1978.

The Department of Justice attorneys are:

Brian Kennedy	739-3146
Mauricio Flores	739-2809
Sally Whitaker (Room 3338)	739- XXXX



Attachment

STAT

Definitions

1. Any reference to plaintiff and/or its affiliated religious organizations means the Founding Church of Scientology of Washington, D. C.. and any Scientology Church or Mission in the United States presently in existence or in existence at any time between 1955 and the present. The term also includes The Academy of Religious Arts and Sciences, The Academy of Scientology, The Allied Scientists of the World, The Church of American Sciences, The Church of Scientology, The Congress of Eastern Scientologists, The Distribution Center, The Foundation of Scientology, The National Academy of American Psychology, Free Worry Clinic, Hubbard Association of Scientologists and Scientology, Hubbard Association of Scientology International, Hubbard Communication Office, Hubbard Dianetic Foundation, Inc., Hubbard Dianetic Research Foundation, Inc., Hubbard Dianetic Training School, Hubbard Foundation, Hubbard Guidance Center, Institute of Scientology, Pan American Friends Foundation, Scientology Consultants, Scientology Foundation, and Society for Advancement of Clergy.

2. Any request for information concerning the activities of the defendants or defendant agencies or any one of them calls for the actions of any officer, agent or employee, whether full-time or not, and whether paid or not, and specifically includes the actions of any subordinate agencies, branches, field offices (specifically including United States Attorneys offices), or other subdivisions under the control or direction of any of the defendants. In the case of the United States Attorney's Office for the District of

Columbia, it specifically includes members or agents of the Washington Metropolitan Police Department when acting in concert with or under the direction of any member of said Office.

3. Any reference to officers or members of the Church of Scientology who may have been the subject of activity, surveillance or reporting by any of the defendants includes any persons subject to such activity, surveillance or reporting because of their connection with plaintiff or any of its affiliated religious organizations, or known at the time of such activity, surveillance or reporting to have been so connected, or identified in any records of such activity, surveillance or reporting as being so connected.

4. Any reference to the time period covered by this lawsuit means the period from 1955 to the present.

5. Any reference to surveillance includes investigatory activity of any kind, including but not limited to interrogation, field investigation, collection of documents, surveillance of premises, use of informers, whether paid or not, use of infiltrators, opening of mail or other interception of any communication, mail cover, or electronic surveillance.

6. Any reference to electronic surveillance includes wiretapping, bugging of premises, wiring individuals for sound, the use of pen registers, or the employment of any other electronic technique, to intercept, overhear, monitor or otherwise discover either the contents or the existence of any communication.

7. Any reference to the use of informers or infiltrators includes any effort successful or not, (a) to derive information from any individual, whether paid or not, within the organization of the plaintiff or any of its affiliated religious organizations,

attending any courses or meetings of such organizations, or otherwise related to such organizations, who failed to inform such organization of their investigatory function or their connection with the government or (b) to employ such an individual for purposes of disrupting, impeding or otherwise hampering in any fashion the operation, organization or growth of such organization. The term includes any such efforts whether the individual's connection with Scientology began with or pre-dated their agreement to provide information to or perform other acts for any of the defendants.

Questions

A. Questions Regarding Surveillance Activity

1. Have any defendant agencies at any time during the period of this lawsuit engaged in electronic surveillance of the plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such surveillance was engaged in representing any such organization, officer or member?

2. Have any of the defendant agencies at any time during the period of this lawsuit engaged in physical surveillance of the premises of the plaintiff or any of its affiliated religious organizations or any officer or member of any such organization, by placing a person or persons on or near such premises for purposes of surveillance or attempting to follow any such person for such purpose?

3. Have any of the defendant agencies at any time during the period of this lawsuit used or attempted to use informers or infiltrators, (1) to obtain information with respect to plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such activity was engaged in representing any such organization or person or (2) to disrupt

or otherwise hamper in any fashion the activities, organization, operation or growth of such organization?

4. Have any of the defendant agencies at any time during the period of this lawsuit intercepted, opened, read copied, delayed or otherwise interfered with or placed a "mail cover" on any written communications, whether deposited in the mails or conveyed by private means, addressed to or sent by plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such interception, opening, interference, or cover, was engaged in representing any such organization or person?

5. Have any of the defendant agencies at any time during the period of this lawsuit entered or caused to be entered the premises of plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such entry was engaged in representing any such organization or person, where the person or persons making such entry had not first obtained either a search warrant or the express permission of such organization or person, and where the purpose of such entry was to conduct a search?

6. If the answer to any of Questions 1-5 above is "yes," state with respect to each instance of activity responsive to such questions: (1) the agency or agencies and/or subdivision[s] thereof responsible for such activity, (2) the premises and/or the persons who were the subject[s] of such activity, (3) the nature of the activity (electronic surveillance, use of informer, etc.) involved, (4) in the case of any electronic surveillance, the specific method of surveillance involved; (5) in the case of the use of informers and infiltrators, the names of such informers and infiltrators,

(6) the date[s] of commencement and termination of the activity, (7) the location of the activity if not revealed in response to sub-part (2) above, (8) whether any recordings, logs, digests, reports, notes or other records of any kind regarding the activity were made, (9) if so, whether such records, or records of such activity in any form presently exist, (10) if so, the name[s] of the person[s] having custody at present of such records, (11) if the answer to (7) is "yes" and the answer to (8) is "no," when and why such records were destroyed or lost, and (12) the authorization, if any, for engaging in such activity;

B. Questions Regarding Agency Reports, Records, etc.

7. With respect to each defendant agency, including any subordinate agency or subdivision, which possesses, maintains or at any time during the period of this lawsuit has possessed or maintained files or records of any nature regarding plaintiff or any of its affiliated religious organizations and/or the officers or members thereof:

(a) describe by category the information, files and records so possessed or maintained;

(b) for each such category of information, files or records, give the statute[s] and/or regulation[s] authorizing, and/or governing in any manner the collection and maintenance of the material;

(c) to the extent not covered in the response to (b), with respect to each such category of information, files or records, describe or provide any official documents prescribing the policies of the agency governing (1) the retention and destruction of the records, (2) the verification of information received (3) the correction of records if they are learned to contain incorrect information, and (4) the use or dissemination of such information, files or records, or any reports,

summaries, abstracts or notes thereof or derived therefrom, outside the agency, subordinate agency or subdivision.

8. Have any of defendant agencies at any time during the period of this lawsuit disseminated any of the information, files or records in their possession concerning plaintiff or any of its affiliated organizations or the officers or members thereof, or any reports, summaries, abstracts or notes thereof or derived therefrom, to any of the following:

(a) other federal government agencies, whether defendants herein or not; (b) any state or local governments or agencies thereof; (c) any foreign governments or agencies thereof, or international organizations, whether such dissemination was accomplished directly or through embassies or other agencies of the federal government located abroad; (d) any Members of Congress; (e) any private individuals; or (f) any private groups.

9. If the answer to any sub-part of Question 8 is "yes," state with respect to each such instance of dissemination:

(a) the author and/or transmitter of the information, file, record, report, summary, abstract or note; (b) the recipient thereof; (c) the purpose of the dissemination; (d) the authority, if any, for the dissemination; (e) the substance of the information disseminated; (f) the steps, if any, taken to verify the information prior to its dissemination; and (g) whether any information so disseminated was ever learned to be false and, if so, what steps were taken to correct it.

C. Questions Concerning Adverse Government Activity

10. (a) Have any of defendant agencies at any time during the period of this lawsuit subjected any of their employees, or applicants for positions of employment to investigation, interrogation or other special scrutiny because they were or


were alleged to be Scientologists or connected with the Church of Scientology?

(b) If the answer to (a) is "yes," state with respect to each such instance (1) the name of the employee or applicant, (2) the agency, subordinate agency or subdivision involved, (3) the nature of the investigation, interrogation or scrutiny, (4) the substance of the information derived therefrom, (5) the efforts, if any, to verify the information, and (6) the personnel action taken, if any, including hiring, firing, declining to hire, promoting, declining to promote, transfer, etc.

15. (a) Do the defendants contend that Scientology is not a religion, or that plaintiff and its affiliated religious organizations are not bona fide religious organizations?

(b) If the answer to (a) is "yes," please specify the facts or matters contended to be facts on which the defendants base such a contention and the legal significance of those facts in reaching such conclusion.

Respectfully submitted,


Earl C. Dudley, Jr.


Robert A. Seefried

SEYMOUR & DUDLEY
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Washington, D. C. 20036
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February 13, 1978

Appeals Court Approves Search at Scientology Church

By Toni House

Washington Star Staff Writer

The U.S. Court of Appeals has upheld the legality of a government search warrant used last summer to seize hundreds of documents during a raid on the Founding Church of Scientology here.

The court's action, which overturns a lower court finding that the warrant was unconstitutional, opens the way for the continuation of a grand jury probe into allegations the church conspired to infiltrate such agencies as the Justice Department and the Internal Revenue Service in order to steal confidential documents through break-ins and other means, and, in one case, to bug a high-level IRS staff meeting.

The appeals panel of U.S. Circuit Judges Roger Robb and George E. Mackinnon and Chief Customs and Patents Appeals Judge Howard T. Markey unanimously ruled that District Chief Judge William B. Bryant

was wrong in finding the 35-page search warrant unconstitutionally broad.

BRYANT'S JULY 27 ruling followed simultaneous raids July 8 on the Founding Church at 2521 S St. NW and church headquarters in Los Angeles. Since Bryant's decision, two boxes of documents taken here have been under court seal, but the appeals court ordered them returned to the government immediately so that grand jury proceedings can continue.

In their motions before Bryant, church attorneys raised a number of objections to the raid, but Bryant chose to rule only on the issue of whether the warrant was too general under the Fourth Amendment guarantee against unreasonable search and seizure.

Hugh Wilhere, a church spokesman, said yesterday the church will appeal today's opinion and also will ask Bryant to rule on the other

issues, which include the propriety of the way FBI agents carried out the search; whether all the documents seized were within the scope of the search; and whether the information on which the warrant was based was too old to be valid.

In California, a federal judge also sealed a more voluminous collection of Scientology documents taken there because, he said, he was compelled to follow Bryant's ruling. A government attorney said the government will now move to have those documents released as well.

IN ITS 13-PAGE opinion, the appeals court said that it made a "cursory" examination of the documents taken here and noted that they included "apparently original documents from the Internal Revenue Service" and "copies of Central Intelligence Agency documents marked 'secret'."

In his July ruling, Bryant had called the last section of an otherwise highly detailed warrant a "wild card" because it referred to "any and all . . . evidence at this time unknown of the crimes of conspiracy, obstruction of justice and theft of government property." Bryant said the warrant "permitted seizure of anything at all."

The appeals court, however, said Bryant overlooked the rest of the section in question: "which facts recited in the accompanying affidavit make out." This phrase, the court said, brought the warrant into compliance with the latest Supreme Court ruling.

The search warrant was based on evidence given to the FBI by Michael Meisner, a former top church official who admitted taking part in break-ins at the U.S. attorney's office here. Meisner, according to an FBI affidavit, had escaped "house arrest" in the church's Los Angeles headquarters in order to turn himself in here and tell his story.

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THE WASHINGTON POST
28 JULY 1977

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Org 1 Scientology

Scientology Raid Unconstitutional, U.S. Judge Rules

By J. Y. Smith

Washington Post Staff Writer

A U.S. judge ruled yesterday that the government must return documents seized in an FBI raid on the Foundation Church of Scientology here July 8 because the search warrant used was unconstitutionally broad.

The raid on the church offices at 2125 S St. NW and a similar operation against Scientology offices in Los Angeles were made in connection with an investigation of alleged conspiracies by church officials. The purpose of the alleged conspiracies was to burglarize government offices, steal government property, and obstruct criminal investigations, according to court documents.

Chief Judge William B. Bryant of U.S. District Court ordered that all the materials seized here, and all copies and records of such materials, be impounded by the clerk of the court. He said the material would be returned to church officials unless the government appeals his ruling within 10 days.

The ruling applies only to the Washington raid. The Los Angeles raid is the subject of another court proceeding there.

A spokesman for the U.S. Attorney's Office, which has been directing the investigation against the church here, said the office had recommended to the Justice Department that an appeal be taken.

Officials declined to comment further. If Bryant's ruling is upheld on

appeal, it appears that the investigation's future is uncertain.

"The government really goofed this time," said Philip J. Hirschkop, an attorney for the Scientology church. "It was a grossly illegal search. It really proves how the government has operated with regard to the Church of Scientology."

The search warrants used here and in Los Angeles were granted on the basis of information supplied to federal investigators from a former Scientology official. The official reportedly claimed to have personal knowledge of church members who infiltrated the Justice Department and the Internal Revenue Service and stole some of the agencies' files on the church.

The warrant used in Washington listed 148 specific items that were sought. In addition, it sought other material and its final paragraph authorized agents to seize "any and all fruits, instrumentalities and evidence (at this time unknown) of the crimes of conspiracy, obstruction of justice and theft of government property."

Judge Bryant ruled that this language was so broad that it amounted to a "general warrant"—authority to seize anything and everything at the discretion of the agents—and that it therefore violated the guarantee of the Fourth Amendment of the U.S. Constitution against "unreasonable searches and seizures."

The Constitution requires that search warrants list the items sought with "particularity," Bryant said. "General warrants" lack this particularity.

"The flaw I find in the warrant involved here is precisely the evil that inheres in general warrants," Bryant wrote. "The warrant in this case authorized—if indeed it did not direct—agents of the FBI to examine carefully and completely the contents of every document in the fourth-floor files of the Church and to make ad hoc, on-the-spot decisions as to which of those documents constitute evidence of conspiracy—an amorphous and open-ended crime that . . . has since its conceptual inception perplexed commentators and courts alike."

According to court records, the documents seized here included information on the personal lives of judges deciding Scientology lawsuits, files on "bugging devices" and a "locksmith course" and organizational charts of U.S. agencies.

ORGI Scientology

U.S. Agrees to Limit Use Of Scientology Papers

The federal government agreed yesterday to limit the dissemination of materials seized from the Church of Scientology in Friday raids here and in Los Angeles pending a further hearing, possibly later this week, over whether the search warrant was legal.

Assistant U. S. attorney Brian Shaughnessy said at a court hearing yesterday the files would be used only in a pending criminal investigation of an alleged church plot to infiltrate the government, and said that had been the only government plan for the documents anyway. Church attorneys had asked that the documents be impounded by the court, alleging that the government had planned to use the materials in defending civil lawsuits the Scientologists have filed against the government.

U. S. District Chief Judge William B. Bryant said he felt the impoundment order was unnecessary, considering the government's agreement to control the documents.

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THE WASHINGTON STAR (GREEN LINE)

12 July 1977

David
ORAL Scientology
CIA 104. Malloy,

BEENARD

(original
Pike)

Scientology Files Seized in FBI Raid Include CIA Data

By David Pike

Washington Star Staff Writer

The FBI ticked them off, one by one:

"Folder marked U.S. Central Intelligence Agency Agents Directory" and "Folder captioned U.S. Central Intelligence Agency Employment of Psychiatrists. Folder contains raw data report dated 1 April 1974.

"One folder titled 'Locksmith Course' containing numerous manuals and data concerning locks" and "Folder entitled Bugging Devices containing data with cover sheet entitled Excerpeions re: Devices."

"One legal size piece of paper depicting Justice Department (and another with an Internal Revenue Service) organization chart."

"Compliance report dated 5-12-77 per (U.S. District Court) Judges Aubrey E. Robinson and Charles R. Richey."

The files were among the hundreds seized Friday by FBI agents who raided the Washington office of the Founding Church of Scientology, according to a 31-page document filed yesterday in U.S. District Court.

For the raid here and a simultaneous search of the church's national headquarters in Los Angeles, dozens of FBI agents used search warrants issued by a federal magistrate.

THE WARRANTS resulted from an affidavit — signed by an FBI agent and based on two weeks of "extensive interrogations" of a former top church official — stating that the church over the last several years has infiltrated the Justice Department and the IRS, has copied confidential government documents through break-ins and other means and, in one case, bugged a high-level IRS meeting.

Church officials late yesterday declined comment on the document listing the seized church files. "I haven't seen the list and I'm not in a position to comment," said the Rev. Hugh Wilhere. "And our lawyers told us not to comment, as these matters will be coming up in court."

Lawyers for the church tried unsuccessfully Friday afternoon to persuade U.S. District Chief Judge William B. Bryant to issue an order halting the search. The attorneys contended that the warrant was too broad and violated such rights as freedom of religion and the attorney-client privilege.

Late yesterday, the lawyers filed another suit asking the court to impound the seized documents and to keep them under seal pending a final determination as to whether the search was legal. Bryant was scheduled to hear that plea late this afternoon.

Earlier yesterday church spokesmen contended "some of the documents that were the subject of their search were obtained under the Freedom of Information Act (FOIA). The fact that they were legally obtained and yet made the target of the FBI's police-state raid makes one easily question the full and true motives for the actions of an

THE STATEMENT, charging that "the FBI has clearly sought to try their case in the press by the staging of this event," also contended that it was the government that has infiltrated and harassed the church for perhaps as long as 20 years.

The statement contended, for example, that an "undercover agent" of the Food and Drug Administration in the late 1950s had infiltrated the church here, posing as a member, in order to obtain information on the E-meter, a device resembling a lie detector. The FDA was investigating whether the church was making fraudulent medical claims for the E-meter, which the church argued was a legitimate device that helped members identify past traumas and achieve self-fulfillment.

In a related development yesterday, five church members responding to subpoenas from the U.S. Attorney's Office here appeared briefly before a federal grand jury. According to various sources, the five were to be fingerprinted in a move related to the seizure of the documents, which reportedly were removed by FBI agents wearing gloves.

The grand jury investigation is seen as the second phase of the government's probe, following what one source said was a "very satisfactory" search for copies of stolen government documents on Friday.

The FBI document listing items seized in the search contains no comments and only the most terse description of most of the files involved. It lists numerous internal church memos, letters and directives dealing mainly with government agencies that have been investigating the church for a number of years, including the IRS and Justice.

THE DOCUMENT lists "reports" and "data estimates" of 10 of the 15 federal judges here — Bryant, Robinson, Richie and John J. Sirica, George L. Hart Jr., Howard F. Corcoran, John H. Pratt, June L. Green, John Lewis Smith Jr. and Oliver Gasch — and D.C. Superior Court Judge George H. Goodrich.

Court sources said they thought all three judges have at one time or another handled cases involving the church, mainly FOIA cases against the government agencies that have investigated the church over its tax-exempt status and other matters.

One document is a "Folder entitled 'Gasch, Oliver' containing (a. One letter with enclosure dated 28 October '72 re: Oliver Gasch - John J. Sirica connection. (b. document entitled Oliver Herman Gasch, 1906 through January 1967." In its search warrant, the FBI had said it was seeking copied, stolen letters to and from Gasch dating back to the 1950s, when he was U.S. attorney here.

Also listed is a folder on Nathan Dodell, the assistant U.S. attorney who is handling the church's FOIA cases here for the government. The FBI affidavit had contended that Dodell's office in the federal courthouse here had been broken into four times last year by two men — Gerald B. Wolfe, a former church member and IRS clerk-typist who pleaded guilty last month in the break-in case, and Michael Meisner, the top church official who said he recently escaped "house arrest" by the church and now is cooperating with the government.

The Dodell file, according to the FBI list, includes a report beginning "a time track on Nathan Dodell" and "biographical data on him," several letters about or from Dodell, and "one investigative report re Possible Attack — rumor from Solicitor General

11/10/77

8 to 10,000 Expected at Scientology Sessions

The first International Conference for World Peace and Social Reform, a four-day event beginning Wednesday in the Anaheim Convention Center, is expected to attract 8,000 to 10,000 Scientologists. The Church of Scientology, an applied religious philosophy, is sponsoring the meetings.

The program will include speakers from government, medicine and social reform, as well as exhibits by artists and musicians.

Key speakers Friday and Saturday will be Victor Marchetti, a former CIA official and coauthor of the book, "The CIA and the Cult of Intelligence"; Daniel Sheehan, attorney for the National Jesuit Office of Social Ministries who is known for his work on the Pentagon Papers case, and state Assemblyman Richard Alatorre.

Church of Scientology Finally Gets Foothold on NSA

Data yielded grudgingly under Information Act

By Vernon A. Guidry Jr.

Washington Star Staff Writer

The National Security Agency is the kind of operation in which the public affairs office telephone is answered with a four-digit number rather than a name, a practice that even the CIA has abandoned.

So perhaps it wasn't surprising when NSA time after time told the Founding Church of Scientology of Washington that it could find no information in its files about the church, nor its founder, L. Ron Hubbard.

The church had made repeated requests over a number of months, asking NSA under the Freedom of Information Act if that massive electronic spy agency had any such information.

The church was no stranger to the federal government's investigatory and information gathering arms, nor to controversy, most of which centered over the use of a lie-detector like device called an E-meter to assess the mental and spiritual condition of a subject.

But of late, the church has been striking back at the FBI, the Internal Revenue Service, the CIA and the NSA, chiefly through the courts and the information act.

WHILE IT WAS CARRYING on a game of thrust-and-parry with NSA through the mails, the church was also suing the CIA. In the course of that suit, the CIA admitted that it had 16 documents relating to the church in its files — all received from NSA.

Armed with that information, the church went back to NSA this June and demanded once again that the agency own up to having information in its files.

This month, the reply from NSA was received. Yes, the agency acknowledged that it had found at least 15 of the 16 documents identified by the CIA. But it still claimed that the earlier denials were accurate.

That claim was made in a letter to the church from John R. Harney, who identified himself as a "freedom of information appeal authority."

Harney wrote that the documents "were located in warehouse storage and were found only on the basis of the information we received from the CIA; they could not be found on the basis of the subject matter content.

"I must therefore reaffirm the NSA information officer's previous statements that no information was located in agency files concerning the Church of Scientology under any of the headings or in each of the

categories, as specified in your previous requests, in this agency's records," Harney wrote.

IN ANY EVENT, WOULD NSA now release the documents, whatever they are? No. Wrote Harney: "The National Security Agency is precluded by Title 18 U.S.C. 793 from providing information concerning classified communications intelligence activities except to those persons authorized to receive such information."

That admission didn't go unnoticed by the scientologists. A spokesman, the Rev. Hugh Wilhere, declared that "the fact that the NSA is holding files and conducting 'foreign intelligence activity' on a church by their own admission is highly incriminating in itself."

There are those in NSA who apparently would like to say more in their own defense on this issue. Information officer Norman Boardman, who was involved in some of the correspondence that assured the church that no such documents existed, is one of them.

Yesterday, Boardman was asked how, for instance, the CIA could find the documents supplied by NSA, but NSA could not. While supplying no direct answer, Boardman insisted that "there are two-sides to this thing."

When a questioner on the telephone asked him to expand on that, he said he would call back. When he did, he said only, "I'm not prepared to go beyond 'no comment.'"

True to the form it has been developing, the church yesterday went to court. It filed a Freedom of Information action in U.S. District Court here to force release of the documents.

And, it asked the court to force NSA to make a search of its records, a complete search this time.

FOUNDING CHURCH OF SCIENTOLOGY
Approved For Release 2003/09/10 : CIA-RDP96-00787R000200020051-4
FUNERAL SERVICE

by L. Ron Hubbard

Our loss
Is gain in other times.
Our hopes on future bent
Must then depend on incidents like these
For bodies wear
And in
The fine grist mill of time
Are spent in service such
As yours
And go, our time by smallest time
Into the yesterday, wherein began
The conquest of Eternity.

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What did we know

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When yesterday we wept?
 What grip upon us had our ignorance
 That we in our conceit did feel
 That all of us were mortal here
 And lives once led were spent
 And wasted on our selfish selves.
 How narrow is such scope
 To feel that we
 Should be eternally
 The goal of all the toil
 And wretchedness
 From birth to death
 And like a play
 The curtain dropped
 And left an empty stage.
 How dull of us to feel that we
 Were all the target of this strife
 And that we lived but once
 And living then did reconcile
 The whole in one brief life.
 Oh no, a wider drama here
 Was planned and staged
 And we with narrowness of mind
 Did overlook the plan.
 We said that all is
 Mortal flesh
 The spirit just a thing
 To send, for pence
 To some strange heaven
 There to waste its skill
 Or had we not the price
 To some deep other place
 To pain, and waste again
 The life.
 To what dark depths
 Were dropped our minds
 To feel that flesh
 Is capable of love or trust or
 Livingness
 To feel that fingernails and masks
 Are all we need to dream.
 To what deep place
 Did our love go
 That mass could recompense?
 Anxieties that ruled our years
 Were nurtured here
 And we
 Made blind and dumb

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By other greed
Spanned down our lives
To One.
What waste!
To feel that all our love
Our work,
Our gifts,
Our knowledge and our
Sighs
Were meant
To be consumed
All in one
Breath and flash
And by one name?
Today, come wiser now
The chains gone weak
The tyranny of cult
Gone tired with the years
We look
We find we *live*
Not once
But on and on
From body's birth to
Body's grave and then
To birth again
And yea to grave again
So to dispose possessions
Oft come undone
With livingness.
From century to century
From age to age and on
We go in march along
The path that leads
Forever up the countless
Tick of time.
We crawl, we walk, we fly
We win
From here and evermore
The heritage of all our lives
And spend it once again.
Why this is no sad and
Bleakish look
No sorrowed thing
This life.
This is an adventure pure
Where without knife or
Provender we leap
Aloft into eternity

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And span forever in a breath.

This is adventure where

We step from tie to

Body tie

And go

Our way.

Our suff'ring is

Self centred here

For we have lost

In truth

The smile,

The touch,

The skill and happiness

We gained

From (deceased),

Who gave to us

From his/her past

Ability to live

And fare against

The tides and storms of fate

It's true we've lost

His/her shoulder

Up against the wheel

And lost as well his/her counsel

And his/her strength

But lost them

Only for a while.

He/she goes

Not with the dismal roll drum

But with a whisper like

A Faery's sigh

To smooth the way

For when we come.

He'll/she'll be in some good

Future time

And future place

His/her smile

His/her touch

His/her skill

Invested there to make

A way of life.

True, true we may not

Know him/her then and

Only know his/her work

But still

If we sent not ahead

Our vedettes into time

We would not have

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A race.

And so, branched off from
This Genetic Line

And into some new
Corner or new world

We've sent you, (deceased)
And there there'll be

We know it now,
A smile,

A touch,

A happiness for us
And you

You could not find
On earth

And so it turns
The day, the year,

The age.

And so we go
With banners furled

And quietly
Upon our way.

But now we know
And now we'll find

The Way.

Into the dark
Has come the Light

Into tomorrow
Enters night

Into heaven
Go no more

Into life our
Spirits soar

Conquering ever
Wisdom's store

We do not tremble
Faced with death

We know that living
Is not breath.

Prevail!
Go, (deceased)

And take
The life

That offers now
And live

In good expectancy
That we

You can control

That which you must.

Our loss

is gain

In wisdom and in skill

To future dates and other smiles

And so we send into the

Chain of all enduring time

Our heritage

Our hope

Our friend.

Goodbye, (deceased).

Your people thank you for having lived

Earth is Better for your having lived

Men, women and children are alive today

Because you lived.

We thank you for coming to us.

We do not contest your

Right to go away.

Your debts are paid.

This chapter of they life is shut

Go now, dear (deceased) and live once

more

In happier time and place.

Thank you, (deceased).

And now here lift up

Your eyes and say to

Him/her

Goodbye.

(Congregation): Goodbye.

Goodbye, our dear

Goodbye.

We'll miss you, you know.

Let the body now

Draw away

To be consumed to ashes

And to dust

In earthly and in cleanly fire

To be no more, no more.

And that is done.

Come friends,

He/she is all right

And he/she is gone.

We have our work

To do. And he/she has his/hers.

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He/she will be welcome there.

To Man!

• We of the Church believe:

That all men of whatever race, colour or creed were created with equal rights.

That all men have inalienable rights to their own religious practices and their performance.

That all men have inalienable rights to their own lives.

That all men have inalienable rights to their sanity.

That all men have inalienable rights to their own defence.

That all men have inalienable rights to conceive, choose, assist and support their own organisations, churches and governments.

• That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others.

That all men have inalienable rights to the creation of their own kind.

That the souls of men have the rights of men.

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in non-religious fields.

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

And we of the Church believe:

That man is basically good

That he is seeking to survive

• That his survival depends upon himself and upon his fellows and his attainment of brotherhood with the Universe.

And we of the Church believe that the laws of God forbid Man:

To destroy his own kind

To destroy the sanity of another

To destroy or enslave another's soul

To destroy or reduce the survival of one's companions or one's group.

• And we of the Church believe:

• That the spirit alone may save or heal the body.
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