

DECLARATION

I...hereby declare and state as follows:

1. I am over 18 years of age, of sound mind and body, and not under the influence of any drug or other substance that would affect my memory or ability to tell the truth. I have personal knowledge of the facts that I set forth in this Declaration.

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3. I personally know Rathbun, as I served on the staff of the same Church as he did. Therefore, I was at various times in a position to witness Rathbun abusing subordinates or other Church staff members. He also threatened and intimidated me personally on several occasions.

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11. One afternoon in the summer of 1998, Rathbun came up next to me while I was in our staff library. He threatened me saying that he wished I was a guy so he could "punch my lights out." He then pushed hard against the bookcase that was next to me, which was about 8 feet tall and full of books, so that it rattled and shook. I was concerned something might fall on top of me, so moved back. (I was young at the time and I am quite small compared to Rathbun, who is over 6 feet tall.)

12. That same year, albeit a bit later in the year than the foregoing incident, Rathbun came into the office in which I worked at the time. He was already angry when he entered the room. He came at me screaming loudly, and I was concerned that he was going to hit me. He stopped a couple of feet short of me, and to further intimidate me, he grabbed a chair and threw it violently across the room, breaking the chair.

13. Rathbun again came into that office. He was again screaming at me. This time he took a telephone from the desk and threw it across the office in the direction where ... and I were seated. The phone smashed against the wall or a desk, but fortunately did not hit either one of us.

14. In addition to his violence being irrational and uncalled for, Rathbun interrupting counseling activities severely violated the code of conduct L. Ron Hubbard created and that all auditors pledge they will follow.

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16. Rathbun gave the impression he was going to help me by delivering a counseling session to me when I was upset. ...A few days later, when around other colleagues, he then made fun of what I had told him in counseling, belittling me for what I said. Not only did I find this a personal affront and offensive, since he had taken me in for counseling under the false guise of "helping me," the information I gave him in counseling should have been held in confidence.

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20. One of the most basic points in Scientology is to be kind and caring toward others. The whole premise of our religion is to help others and make them more able in life. Rathbun's instructions and actions were in direct contravention to the ideals of Scientology.

21. Rathbun tried to give the impression he was "working for Mr. Miscavige" by using these scare tactics detailed above. Because others had no trust in Rathbun as a person on his own, but did in Mr. Miscavige, it was apparent that Rathbun attempted to use the universally-held respect earned by Mr. Miscavige to forward his own personal ends.

22. It became very clear to me after personally meeting Mr. Miscavige that Rathbun was the author of his own activities to put people in fear and that Mr. Miscavige had nothing to do with and was not aware of Rathbun's nefarious activities.

23. How I observed this is that all of the above facts I laid out...occurred while Mr. Miscavige was not present at the Int Base, and that Rathbun would never employ these tactics while Mr. Miscavige was on site.

24. I only personally saw Rathbun with Mr. Miscavige at Gold about 5 times between 1998 and 2003, and in each case, I observed Rathbun act like a different person. He was calm, toned down, and even nice. Yet when Mr. Miscavige was not around, my personal relationship with Rathbun was one based on fear of his blow-ups and threats.

25. I met Mr. David Miscavige when I first came to the Int Base in 1997. Shortly after I arrived, I ran into Mr. Miscavige and he stopped me and immediately introduced himself, shook my hand and made me feel very welcome.

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27. Over the years, any time I have gotten a chance to see Mr. Miscavige he has been interested in what I was doing and how I was doing. He has always wanted to know that I was doing well. On a number of occasions he has asked

about my family and took a personal interest in seeing that I moved through my training and processing.

28. One time in 1998 Mr. Miscavige found me upset, he immediately asked me what was going on and if there was something he could do to help. He spoke to me about the matter and because of his nature as a person just speaking with me was enough to make me feel better and handle what I was having trouble with at the time.

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30. In many more instances than the above, I have been taken aback by the care and consideration of Mr. Miscavige knowing the nature of his busy schedule and unbelievably large workload.

31. In other instances where one of my friends or colleagues, who Mr. Miscavige has mutually known, have undergone surgery, any family loss or other matter of concern, I have seen Mr. Miscavige take the time to see that they were getting proper assistance, any needed counseling, in addition to sending beautiful flowers and condolences. In each case these friends/co-workers were extremely well cared for.

32. When Mr. Miscavige has visited Gold I have seen him speak with staff, take personal interest and care concerning their well-being, progress in Scientology and other personal matters.

33. When we are working in the vicinity of Mr. Miscavige he takes care of details that he should never need to worry about even down to making sure we're eating well and sleeping enough.

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36. What I have written here doesn't even begin to describe what I have seen him do and know he does for our religion all day, every day, day in, and day out.

I declare under the penalties and pains of perjury that the foregoing is true and correct.

Executed this 28th day of July 2009.

/s/
