

1 William T. Drescher
2 23679 Calabasas Road, Suite 338
3 Calabasas, CA 91302
4 (818) 591-0039

5 Attorney Specially Appearing
6 for Non-Party
7 NORMAN F. STARKEY

8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 CHURCH OF SCIENTOLOGY
11 INTERNATIONAL, a California Non-
12 Profit Religious Organization,

13 Plaintiff,

14 vs.

15 STEVEN FISHMAN and UWE GEERTZ,

16 Defendants.

) CASE NO.
) CV 91-6426 HLH (ix)

) DECLARATION OF NORMAN F.
) STARKEY

17 I, NORMAN F. STARKEY, hereby declare and state:

18 1. I am over eighteen years of age and a resident of the
19 State of California. I am currently the Executive Director of
20 Author Services Inc. ("ASI"), and neither ASI nor I is a party to
21 the above-captioned action. I have personal knowledge of the
22 facts set forth in this declaration and, if called upon as a
23 witness, I could and would testify competently thereto.

24 2. I chose Scientology as my religion in 1960. In 1965, I
25 became a full-time staff member of a Scientology Church located
26 in South Africa. I have been an ordained Scientology minister
27 for more than 27 years, and I am a trained and certified
28 Dianetics and Scientology auditor.

3. From 1968 through 1975, I served aboard the ship Apollo,

1 where L. Ron Hubbard resided. I was the ship's Captain and
2 Senior Navigator for two and a half years of this period.
3 Throughout my service on the Apollo, I was in close personal
4 contact with Mr. Hubbard.

5 4. In 1977, I directed the affairs of the Scientology
6 churches in Southern Africa for one year. In 1978, I transferred
7 to the staff of the Church of Scientology of California, and for
8 the ensuing period of approximately one year, I served as
9 assistant director and later assistant producer in connection
10 with a number of films regarding the Scientology religion which
11 were directed and produced by Mr. Hubbard. Between 1979 and
12 1981, I traveled to many Scientology churches around the world,
13 providing those churches with assistance in organization,
14 operations, and efforts to propagate the Scientology religion.

15 5. Early in 1981, as a result of the trust in me that Mr.
16 Hubbard had developed during the course of our long-term
17 friendship and working relationship, Mr. Hubbard employed me
18 directly to see to his personal affairs. To devote all of my
19 attention to that function, I resigned from my position in the
20 Church of Scientology of California. In April 1982, I was one of
21 the founders of Author Services, Inc. ("ASI"), a California
22 for-profit corporation established to act as Mr. Hubbard's agent
23 with respect to his personal, business and literary affairs. ASI
24 was envisioned and functions as a continuation and expansion of
25 my duties as Mr. Hubbard's personal representative. I served as
26 President and as a Director of ASI from January 1983 until
27 January 1986.

28 6. From January 1986 to November 1993, I served as the

1 Executor of the Estate of L. Ron Hubbard and as the Trustee of
2 Author's Family Trust-B, a private trust established by Mr.
3 Hubbard prior to his death on January 24, 1986.

4 7. In November 1993, after the United States Internal
5 Revenue Service granted full tax exempt status to all Churches of
6 Scientology in the United States and in accordance with Mr.
7 Hubbard's will, I distributed the assets of Author's Family
8 Trust-B to the beneficiary, the Church of Spiritual Technology, a
9 special church of the Scientology religion that preserves Mr.
10 Hubbard's works on Dianetics and Scientology for eternity. In
11 December 1993, I returned to ASI in the position of Executive
12 Director, as well as the positions of Director and Chief
13 Executive Officer.

14 8. In my 33 years of experience in the service of the
15 Scientology religion and working with, for, and on behalf of Mr.
16 Hubbard, I have held positions in virtually every level of the
17 Church's hierarchy. Beyond that, I was privileged to have known
18 and worked directly with Mr. Hubbard for many of those years and
19 to have had both his trust and a personal exposure to the life
20 and works of an extraordinary man.

21 9. I am executing this declaration to summarize the
22 knowledge I have concerning issues raised in the case of Church
23 of Scientology International v. Steven Fishman and Uwe Geertz,
24 No. CV 91-6426 HLH (hereinafter the "Fishman case"). I
25 understand that my deposition has been ordered to be taken in
26 this case. I note first that I have never been served with a
27 subpoena for my deposition in this case. In fact, even though the
28 attorneys for Uwe Geertz employ as a "consultant" Robert Vaughn

1 Young, who knows exactly where I work, there has never to my
2 knowledge even been an attempt to serve me at my office. I also
3 understand that in order to obtain and order that my deposition
4 be taken, Geertz's attorneys claimed that I evade service because
5 I am unwilling to testify in legal proceedings. These claims are,
6 at best, totally uninformed. In 1988, I appeared twice for
7 deposition, first in the case of New Era Publications v. Holt,
8 and then in the consolidated cases of Religious Technology
9 Center, et al. v. Robin Scott, et al. and Religious Technology
10 Center et al. v. Larry Wollersheim, et al. In 1992, I testified
11 in a trial in Toronto, Canada, even though there was no legal
12 obligation to do so. Nevertheless, my deposition in the Fishman
13 case was ordered to be taken anyway, despite the lack of any
14 subpoena served on me. Yet, when my attorney attempted to
15 schedule a mutually convenient time for my deposition to be
16 taken, Geertz's attorney refused even to offer a date on which to
17 take my deposition. Consequently, I am setting forth the
18 information I have in this declaration because it is the best way
19 for me to comply with the court order concerning my deposition
20 without the cooperation of Geertz's counsel.

21 10. At the outset I will state that I have had no
22 involvement in the litigation of the Fishman case whatsoever,
23 other than the preparation of this declaration. I am not now,
24 nor have I ever been an officer, director or employee of the
25 Church of Scientology International. I am not involved in the
26 management or operations of the Church of Scientology
27 International or of any other Church of Scientology.

28 11. I have never met, spoken with or had any

1 correspondence, communication, or contact whatsoever with either
2 Steven Fishman or Uwe Geertz. I have never been involved in any
3 activities involving or relating to Steven Fishman or Uwe Geertz.
4 I first learned of the existence of these individuals when I read
5 the allegations they made in Richard Behar's article concerning
6 the Church of Scientology International in the May 6, 1991 issue
7 of Time magazine. What they described in that article was not
8 the Scientology religion in which I have participated for the
9 past 33 years.

10 12. In the Time article, Fishman and Geertz claim that
11 after the FBI arrested Fishman on charges of mail fraud, Fishman
12 was ordered by CSI to kill Geertz and then himself. I can state
13 that in my 33 years of involvement with Scientology I have never
14 heard of anyone in the Church ordering anyone to commit murder or
15 suicide. Both notions go against the very foundations of the
16 Scientology religion and would be anathema to any true
17 Scientologist. Moreover, Geertz and Fishman also contend that
18 the terms "end of cycle" and "EOC," refer to suicide in
19 Scientology. These terms are never used to refer to suicide.
20 "End of cycle" in Scientology terminology simply means that a
21 sequence of actions is complete. A sequence of actions that
22 relate to each other is defined as a "cycle of action," meaning
23 something that starts, the changes it goes through during its
24 duration and its completion, or stop. This refers to any
25 activity that starts, changes and stops. For example, a court
26 hearing is a cycle of action. It starts, continues for a period
27 of time during which changes occur, and eventually it stops or
28 ends. The initials "EOC" by themselves are just not used in

1 Scientology, especially in the manner referred to by Fishman and,
2 again, neither "EOC" nor "end of cycle" are used to refer to
3 suicide. It is also my understanding that it is a matter of
4 public record that Fishman went to jail in 1990 for obstruction
5 of justice for making these same claims about the Church of
6 Scientology International. The above would have been my
7 testimony on Fishman and Geertz were I to have been deposed.

8 13. I also have personal knowledge concerning Robert Vaughn
9 Young and Stacy Young, whom Geertz's attorney has proffered as
10 so-called expert witnesses on Scientology. Both of the Youngs
11 were employed by ASI during the 1980's and I have personal
12 knowledge concerning their experiences while so employed.

13 14. As to Mrs. Young, who claims to derive some of her
14 "expertise" from her employment at ASI, she was employed by ASI
15 from April 1982 until September 1982 when she was dismissed for
16 poor job performance. During her brief tenure at ASI she was not
17 involved in any management decisions at ASI, nor was she involved
18 in any way in corporate, legal, or financial affairs. Mrs. Young
19 held an administrative position which assisted office
20 organization and was simply not in a position to be involved in
21 any of these matters. Consequently, any conclusions she now
22 offers over a decade later as to how ASI functions and my role in
23 it have no basis in fact and are altogether worthless.

24 15. Mr. Young was employed by ASI from 1982 until 1987 and
25 again from 1988 until he left in July of 1989. I understand that
26 Young claims to have been a major national spokesman for the
27 Church of Scientology prior to his employment by ASI. To my
28 knowledge, he was not. Before he was hired by ASI, Young was

1 unknown to me. Young had been a staff member of the Guardian's
2 Office, a former autonomous branch of the Church which was
3 permanently disbanded in 1983 because it had been operating in
4 violation of Church policy and ethical codes and, at times, the
5 law. Young apparently had no involvement with such activities of
6 the Guardian's Office, or he would not have remained on Church
7 staff. He reportedly had experience in public relations and as a
8 writer for the Church and it was for these apparent skills that
9 he was offered employment at ASI.

10 10. From April to November 1982, Young was the ASI Public
11 Affairs Director. Young was removed from this position when it
12 became apparent that the duties of this position were beyond his
13 capabilities. For example, one of his first assigned duties was
14 to conduct successful public relations events which would help to
15 publicize the release of Mr. Hubbard's new fiction book,
16 Battlefield Earth. In the summer of 1982, Young personally set a
17 public relations event at a large rock concert held in San
18 Bernardino County, where he professed he would be able to attract
19 a lot of media exposure for Mr. Hubbard and his new book. Young
20 spent thousands of dollars setting up the event which was a
21 miserable PR failure. Young did not get any press coverage from
22 the event, got no exposure, did not get any useable photographs
23 at the event and did nothing to help promote the book. This
24 festival was a complete waste of time and money. Vaughn Young
25 was removed from his position as a result of this.

26 17. In about mid-1982, Vaughn and Stacy Young compiled a
27 magazine which gave a brief outline of Mr. Hubbard's career as a
28 professional writer during the 1930's and 1940's. This

1 publication led to an idea of assembling a series of magazines on
2 Mr. Hubbard's many different professions and Young asked to be
3 given the chance to write these. In all, a list was drawn up by
4 Young of more than 20 different magazines he would write on Mr.
5 Hubbard's professions. The first of this series which Mr.
6 Hubbard suggested Young write was one covering Mr. Hubbard's
7 accomplishments as a musician, composer and lyricist. Young was
8 given very simple and clear-cut directions on how to put together
9 this first magazine in the series which would be entitled "Ron
10 The Musician." Young was instructed to study the material Mr.
11 Hubbard had written on the subject of music and to interview
12 musicians and people who had worked with Mr. Hubbard in this area
13 to obtain anecdotal material for use in the magazine. Young was
14 then to write articles for this magazine using the anecdotes he
15 had collected.

16 18. I spent many hours briefing Young on my own personal
17 experiences as a musician with Mr. Hubbard. These experiences
18 covered a period of over a year aboard the Apollo, during which
19 time I worked with Mr. Hubbard on virtually a daily basis as a
20 member of the ship's musical touring company, the Apollo Troupe.
21 I set up interviews for Young with more than a dozen other
22 musicians, singers, arrangers and music directors who had
23 experience working with Mr. Hubbard. I set up interviews for
24 Young with musicians, technicians and performers who also had
25 experience working with Mr. Hubbard, especially during a time he
26 developed and released a series of writings on Art. Young was
27 also given files of written materials which he had never seen
28 before which recorded Mr. Hubbard's experiences playing a variety

1 of musical instruments. He was given details and anecdotes from
2 best selling authors like Robert Heinlein and Isaac Asimov who
3 knew and worked close to Mr. Hubbard during the 30's and 40's and
4 who related accounts of Mr. Hubbard's professional career and
5 performances which they had experienced first-hand at parties and
6 events and Mr. Hubbard's numerous performances on national public
7 radio programs.

8 19. Young would not complete the interviews he was assigned
9 to do and began to experience a great deal of difficulty writing
10 this magazine. Even though I attempted to work with Young to
11 untangle his confusions and try to help him write the article, he
12 denied the help he was given and at the same time could not write
13 the magazine himself.

14 20. During the same time period, Young was given the duty
15 of assembling Mr. Hubbard's next fiction book--a 1.5 million word
16 transcript--into a set of 10 separate books for release. His job
17 was to ensure consistency of spelling of the names of the
18 characters throughout the story and to correct any typographical
19 errors. Instead of just doing his assigned job, Young added
20 unnecessary time to the editing assignment by getting into petty
21 details and began entering in unnecessary changes to Mr.
22 Hubbard's manuscripts. As a result, he failed to get the books
23 completed and assembled in time for their publication deadlines.
24 In the end, he had to be removed from this position. Several
25 years later, when the paperback editions of Mission Earth were
26 released, I had to go through all of the books myself and remove
27 hundreds of needless additions and changes to Mr. Hubbard's
28 original manuscripts that Young and another had made.

1 21. As a result of his failure to complete a single
2 magazine, the consistent difficulties he was running into in
3 writing and an unchanging pattern of conduct, despite the help
4 offered to him, Young was dismissed from ASI altogether in June
5 of 1987. He was given a chance to correct himself and he
6 participated in the Church's religious rehabilitation program for
7 sixteen months.

8 22. In October of 1988 Young completed his program in the
9 Church and asked to be given a second chance at ASI. I agreed to
10 accept him back and give him the chance that he requested and he
11 was given a junior writing position in ASI and assigned once
12 again to write the magazines which he failed to complete before
13 his dismissal in 1987. Even though Young had just returned to
14 ASI, I gave him permission to take a leave of absence so that he
15 could visit his family over Christmas. We agreed that on his
16 return, he would immediately complete writing the magazine on
17 "Ron the Musician."

18 23. From January through to April of 1989, Young spent
19 hundreds of hours on this one magazine and in the end he never
20 could complete it. He would not complete the interviews he was
21 assigned to do. He stubbornly persisted in just taking various
22 excerpts from Mr. Hubbard's own writings on the subject of music
23 and tacking these together into an article and would not write
24 one himself. Such a compilation was never the intent of the
25 project and from my position as Trustee, I had every right to
26 direct how such publications were to be done and to expect Mr.
27 Young to perform those functions accordingly. Vaughn Young's
28 incorrigible attitude necessitated my taking him off this

1 assignment. I was at a loss as to what functions he could
2 perform in my employ. Further, he stated his desire to instead
3 continue his investigations into Interpol, begun years earlier.
4 No such activities were ever envisioned at ASI and nor was I
5 interested in engaging in such. From April until June of 1989, a
6 second attempt was made to help Young handle his difficulty in
7 writing and indeed his career in general. He was offered such by
8 various members of Scientology to no avail. However, he refused
9 the help he was given and in July of 1989, he left without notice
10 and never returned.

11 24. In his declaration of January 3, 1994, Young states
12 that he was supposed to have written the biography of the life of
13 L. Ron Hubbard. The Court should be informed that Young was
14 never appointed Mr. Hubbard's biographer by either Mr. Hubbard or
15 anyone at ASI. Young was the one who originated, in 1982, that
16 he wanted to write Mr. Hubbard's biography. On the other hand,
17 Young was also never stopped from writing a biography. He was
18 given the opportunity to write magazines on Mr. Hubbard's various
19 professions to see if he was in fact an accomplished writer or
20 not. That he could not even write a single magazine was clear
21 evidence in itself that he was incapable of writing an entire
22 biography. It should also be noted that Young was not even
23 associated with Mr. Hubbard's biography during the several years
24 he was holding junior writing positions at ASI, nor while he was
25 seeking religious rehabilitation in the Church. Unfortunately
26 for him, the real reason Young did not write any biography is
27 that he apparently is just not a competent writer.

28 25. Young contends to be an expert on the corporate, legal,

1 and financial affairs of ASI and the Church of Scientology and
2 makes various allegations about the financial operations of ASI.
3 During the entire time that Young was employed at ASI he had no
4 duties that involved anything to do with corporate, legal, or
5 financial affairs and his descriptions of these activities
6 confirm his lack of knowledge in these areas. ASI was and is L.
7 Ron Hubbard's personal, literary and business representative.
8 Mr. Hubbard was one of the most prolific authors of the
9 twentieth century, writing tens of millions of words on many
10 subjects, including Dianetics and Scientology. For example, Mr.
11 Hubbard's work, Dianetics, the Modern Science of Mental Health,
12 has sold over 16 million copies. Mr. Hubbard's works are
13 available in 30 languages in bookstores around the world and well
14 over 100 million of his books are in circulation today, all of
15 which generate a substantial amount of royalties.

16 26. Throughout his employment at ASI, Young caused trouble
17 for the other staff by not following the basic agreed upon
18 policies that existed within ASI. ASI operates on the
19 administrative technology developed by Mr. Hubbard. The vast
20 bulk of the policies that comprise this technology are contained
21 in an 11-volume encyclopedic collection. This collection
22 includes over 10,000 pages of text, accompanied by over 100 hours
23 of tape recorded lectures on the subject of administration.
24 Young never completed a study of even the first of these volumes,
25 which is the basic volume all staff members are required to read
26 as part of their staff orientation. I mention this as just one
27 example of Vaughn Young's lack of expertise. He often boasted of
28 his abilities in public relations, as a writer and as an editor,

1 yet he failed in both of these positions, despite repeated
2 correction and efforts by me and other staff to help him learn
3 these areas. Young's inability to learn these administrative
4 policies was responsible for a great deal of his troubles at ASI.

5 27. Both Mr. and Mrs. Young claim that Mr. David Miscavige,
6 Chairman of the Board of Religious Technology Center and formerly
7 ASI's Chairman of the Board, "ruthlessly" controls all aspects of
8 Scientology and every single Scientology staff member and
9 Scientologist, ruling over them with an iron fist. I have known
10 David Miscavige for approximately 16 years and have observed him
11 in his relationship with other staff and members of the Church of
12 Scientology, and in carrying out his duties. The Youngs'
13 description of Mr. Miscavige bears no resemblance to the person I
14 know. These statements show the lengths the Youngs will go in
15 maligning Scientology and Scientologists. By my own observation
16 over many years, Mr. Miscavige is intelligent, friendly and
17 outgoing.

18 28. I never saw Mr. Miscavige do anything other than try to
19 help Young. On each occasion when Young failed at his job in
20 ASI, Mr. Miscavige went out of his way to speak to Young
21 personally and find out what he was having difficulty with and do
22 what he could to help Young get back on his feet. In fact, if
23 Mr. Miscavige could be accused of anything, it might be that he
24 was too kind and understanding in the face of Young's repeatedly
25 demonstrated incompetence. That he now rails against Mr.
26 Miscavige and resorts to personal insults is indicative of how
27 far he will go to spread his venom. And this venom certainly
28 does not belong in the Fishman case or anywhere else.

1 29. I, too, could probably be accused of going too far in
2 helping Young and giving him countless chances, even accepting
3 him back after he was dismissed from ASI. On his return in
4 October of 1988, I spent many hours trying to help him overcome
5 his difficulties as a writer. Yet now he has turned on me, my
6 religion, its Founder and my friends.

7 30. Both of the Youngs contend that the involvement of Mr.
8 Miscavige, while he was Chairman of the Board of ASI, in the
9 handling of the Christofferson v. Church of Scientology case in
10 Portland, Oregon in 1985 exhibits some sort of lack of corporate
11 integrity. What the Youngs omit, quite beside the fact that
12 Christofferson was a direct assault on the religion of
13 Scientology and therefore a concern for all Scientologists, is
14 that L. Ron Hubbard was a named defendant in Christofferson and,
15 prior to a mistrial being declared based on improper conduct on
16 the part of Christofferson's lawyer, a verdict of \$20 million
17 dollars was entered against Mr. Hubbard in absentia. After all,
18 ASI was responsible for Mr. Hubbard's affairs, which included his
19 legal affairs, so of course representatives of ASI would be
20 involved in overturning this illegal verdict which was obtained
21 without Mr. Hubbard ever even being served with the complaint.

22 31. That Young has set himself up as an "authority" on
23 Scientology is ludicrous. As noted above, Young was not highly
24 trained and would not have been considered an "authority" on
25 Scientology even before he left in July of 1989. To my
26 knowledge, Young never held any senior executive positions in the
27 Church of Scientology and during most of the seven years he was
28 employed by ASI, Young held lower-level administrative positions

1 and was not even in a position to be involved in the matters on
2 which he now claims to be an "expert."
3 32. Finally, that Young is now making a living pandering a
4 perversion of the information he did learn while he was working
5 at ASI is not only offensive, it is a blatant and direct
6 violation of the standard employment contract which he signed in
7 1982 and the one he signed on his first resignation from ASI
8 staff in 1987. I also find it despicable that Young now speaks
9 disparagingly about L. Ron Hubbard and openly lies about Mr.
10 Hubbard's past. Mr. Young was employed 11 years ago by Mr.
11 Hubbard's literary agency. As a limited part of his duties he
12 had access to certain proprietary and other personal and private
13 materials concerning Mr. Hubbard. While at ASI and later, Mr.
14 Young voiced none of the outrageous charges which he now makes
15 about Mr. Hubbard. It is only now that Mr. Young is in the paid
16 employ of the defendants that he feels that he can breach
17 employment confidences with impunity while making his wild
18 allegations. None of what Young raises in this regard relates in
19 any conceivable way to anything involving Steven Fishman, or Uwe
20 Geertz, and Young's purpose in raising such allegations is
21 transparently designed to provoke an emotional reaction rather
22 than to address facts relating to this case. Based on my
23 extensive personal experience with Mr. Hubbard, I could
24 thoroughly address and refute each of Young's wild claims.
25 However, I do not deem it appropriate to address these
26 allegations in this forum beyond stating that they are outrageous
27 and false.

28 33. I have no doubt that Mr. Young will state I am

1 affirming these facts because he is now speaking out negatively
2 about Scientology and L. Ron Hubbard. I wish to make clear that
3 it is Mr. Young engaging in the acts of disparagement; not I. In
4 fact, while I knew Vaughn Young, I never heard him make any
5 negative comments about Mr. Hubbard, Mr. Miscavige or
6 Scientology. That he does so now, I find quite disturbing. This
7 was not a matter of Vaughn Young speaking out unpopular views and
8 then being disciplined for such. It just never came up. Yet it
9 is still a fact that my experience with Vaughn Young was one of
10 his repeated failures on practically everything he did. He was a
11 poor employee. I never wished to disparage him and have never
12 written or spoken to him or of him since his departure. I do so
13 only now because he has raised the issue and what he is saying is
14 at best incomplete and at worst simply false.

15 I declare under penalty of perjury under the laws of the
16 United States of America that the foregoing is true and correct.

17 Executed this ^{14th} day of February, 1994, at Los Angeles,
18 California.


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20 NORMAN F. STARKEY
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