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8 RAUL LOPEZ, by and through his Guardian ad Litem
ALICIA LOPEZ
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
12

13 RAUL LOPEZ, by and through his) CASE NO.: BC200852
Guardian ad Litem, ALICIA)
14 LOPEZ,) JUDGE REGINALD A. DUNN,
) DEPT. 44

15 Plaintiff,)

DECLARATION OF JESSE PRINCE

16 vs.)


17 CHURCH OF SCIENTOLOGY MISSION)
18 OF BUENAVENTURA, CELEBRITY)
CENTRE INTERNATIONAL, CHURCH)
19 OF SCIENTOLOGY FLAG LAND BASE,)
WORLD INSTITUTE OF SCIENTOLOGY)
20 ENTERPRISES, CHURCH OF)
SCIENTOLOGY RELIGIOUS TRUST,)
21 ROBERT CEFAIL, TOLI CEFAIL,)
MICHAEL ZETNER, THE RC&A)
22 GROUP, INC., MICHAEL HALEY,)
BRENT JONES, RAUL VALLE, TOM)
23 STEINER and DOES 2 through 50,)
24 inclusive,)

25 Defendants.)



1 I, Jesse Prince declare as follows:

2 1. I am over 18 years of age and currently reside
3 in the State of Colorado, County of Boulder. This
4 declaration is of my own personal knowledge and if called
5 upon to testify to the facts herein I could and would be
6 competently able to testify thereto.

7 2. I am intimately familiar with the Scientology
8 organization, movement and beliefs because I was in
9 Scientology for 16 years (1976-92) and served in the
10 highest ranks, including as the second in command of the
11 Religious Technology Center (RTC). At that time, my
12 position was "Deputy Inspector General, External" which
13 meant being in charge of all activities outside the body
14 of Scientology. This included being in charge of all
15 litigation by or against any Scientology organization,
16 intelligence (spying, covert operations) brought against
17 perceived or imagined "enemies" (which ranged from critics
18 to media to the courts), trademark registrations, and the
19 licensing of trademarks to other Scientology
20 organizations, which was how we tightly controlled all
21 Scientology corporations while creating the false
22 impression of "corporate integrity."
23 

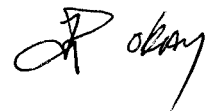
24 3. From the time RTC was created in the early 80's
25 until the time I left RTC which was located at Gillman Hot

1 Springs (hereinafter referred to as the "base"), was at
2 that time the most senior, most powerful and most
3 influential organization in all of Scientology. All at
4 RTC were Sea Org members, as are all at the base. But
5 because of RTC's position, we were the elite at the base.

6 4. In March 1983, I became the Deputy Inspector
7 General, External, and a member of the Board of Directors
8 for RTC, as Treasurer. (The only other board members were
9 Warren McShane as Secretary and Vicki Aznaran as
10 President, during this time.) At the time I was
11 appointed a member of the Board of Directors of RTC I was
12 forced to sign an undated letter of resignation. This is
13 standard practice with all Scientology board members and
14 is another means by which the Scientology corporations are
15 controlled while giving the appearance of corporate
16 integrity.

17
18 5. I have been privy to the destruction and alteration
19 of documents to protect the group. On or about April of 1983 I
20 was present at a meeting, which took place in Los Angeles,
21 California at a Scientology office called Author Services,
22 Inc. (ASI). ASI presented itself as the "literary agency" for
23 Hubbard but it was actually the top of the Scientology empire
24 at that time. All of Scientology was being directed from ASI

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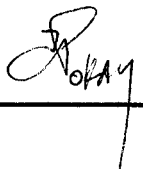


1 in 1982. ASI was where various Scientology corporations went
2 to receive orders.

3 6. Present at the meeting was David Miscavige, then
4 the chairman of the board of ASI, Vicki Aznaran then the
5 Deputy Inspector General of Religious Technology Center,
6 (RTC) and Lymon Spurlock, who was "Director of Client
7 Affairs" for ASI. Mr. Miscavige expressed concern at this
8 meeting that there might possibly be a raid on Scientology
9 by the IRS. At that time, none of the churches of
10 Scientology had received tax exempt status.

11 21. One principle reason why tax exempt status had not
12 been granted was the IRS's position that Scientology
13 founder L. Ron Hubbard (LRH) was actually the managing
14 agent of Scientology in complete disregard of the
15 corporate structure of Scientology. We knew this to be a
16 fact but also knew that it violated IRS rules and thus had
17 to be hidden.
18

19 7. There was concern that the IRS would obtain the
20 hundreds of daily, weekly and monthly LRH orders written
21 by Mr. Hubbard and distributed throughout Scientology.
22 These orders were commonly referred to in Scientology as
23 "advices" to avoid the appearance that LRH was actually
24 running Scientology. In fact, LRH was running
25 Scientology. The principle concern expressed at this



1 meeting was that the LRH orders or "advices" would be used
2 to name L. Ron Hubbard as the managing agent of
3 Scientology.

4 8. Because of an already existing fear that an LRH
5 "advice" might fall into the wrong hands, these orders
6 from him were written in a way that we could deny it was
7 from him. His name was not on them. He was never cited in
8 the dispatch except in the third person. There was no
9 signature and a salutation in reply was never more than
10 "Dear Sir." The routing at the top referred to him merely
11 as "*", an asterisk. However if a person (or an agency)
12 got enough of these, there would be little doubt that we
13 were in touch with Hubbard (via ASI) and he was telling us
14 and each corporation what to do to make him more money.

16 9. David Miscavige specifically stated that ASI was
17 "already dealing with the problem", ridding ASI of any
18 documents that would implicate L. Ron Hubbard as managing
19 agent of Scientology. He stated that under his directive
20 the LRH orders, or "advices", were being collected and
21 transferred by truck to a Riverside County recycling plant
22 where the documents were to be "pulped". This method of
23 destruction was considered to be better than shredding. I
24 was also given instructions that I was in charge of
25 purging the remainder of the Scientology organization of

1 LRH orders. This was to include Church of Scientology of
2 California (CSC); Church of Scientology International
3 (CSI); and RTC.

4 10. Several weeks after this first meeting I
5 attended a second meeting at the ASI offices concerning
6 the continuing destruction of Scientology corporate
7 documentation. In attendance at the second meeting were
8 David Miscavige, Lymon Spurlock, Vicki Aznaran, Norman
9 Starkey and Marty Rathburn. At this meeting, David
10 Miscavige for the first time stated that Scientology had
11 been ordered by a court to produce various documents
12 concerning a former Scientology member named Lawrence
13 Wollersheim who had a lawsuit pending in Los
14 Angeles against the Church of Scientology of California.
15 The court had ordered Scientology to produce Mr.
16 Wollersheim's entire "preclear" (PC) file.

18 11. A "PC " file is one of several files kept on
19 members. The PC file is the file that includes all written
20 records of all "confessionals" done by the member. This
21 means that it includes not only the most self-damaging
22 material but it also reflects every problem the person
23 might have had with the organization, including
24 complaints. This PC file grows with the person's tenure in
25 Scientology.

Prince

1 12. Mr. Wollersheim's PC file was several thousand
2 pages in length and stood as high as a six-foot tall man.
3 Initially at this meeting it was decided that Mr.
4 Wollersheim's PC file would be redacted and culled of any
5 evidence or documentation which might assist Mr.
6 Wollersheim in his lawsuit against CSC. There was also
7 concern that the materials known as Clear, OT I, OT II, OT
8 III and NED for OT's (NOTS) would be open to public
9 inspection if Mr. Wollersheim's files were produced as
10 ordered. Scientologists are taught that a person could
11 catch pneumonia and die if that person is prematurely
12 exposed to these "upper level" materials without first
13 having taken many hours of preparatory auditing.
14 Ultimately, approximately 50 pages were produced pursuant
15 to the court order. Mr. Wollersheim's PC file was culled
16 based on a direct order from David Miscavige.
17

18 13. Later, I was informed that a second court order
19 was issued to produce Mr. Wollersheim's entire file.
20 Faced with the prospect of having to produce the entire
21 file David Miscavige gave orders that the entire file
22 simply be destroyed by being pulped.
23

24 14. Pursuant to Mr. Miscavige's orders I ordered
25 Rick Aznaran to take Mr. Wollersheim's PC files to the
recycling plant in Riverside to be pulped. Several hours

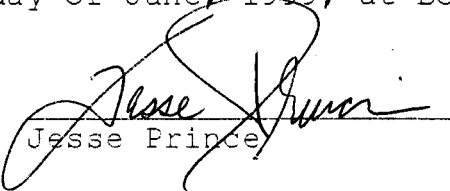
1 after I gave the order to have Mr. Wollersheim's PC files
2 destroyed, Mr. Aznaran returned and confirmed that the
3 records had been pulped and even showed me a small bottle
4 of pulped material, saying "Here's what's left."

5 15. The material that David Miscavige ordered
6 destroyed and which Rick Aznaran had pulped was the same
7 material that the court had ordered produced in Mr.
8 Wollersheim's Los Angeles court case against CSC.

9 16. It is incumbent on this and every court, as well as
10 the authorities, to realize the amount of deception,
11 chicanery, lying, manipulation and outright criminality that
12 Scientology will employ to hide the truth about their criminal
13 activities. They will spend any amount of money to do this. I
14 know because I was part of it for years. I received orders to
15 break the law. I issued orders to break the law. I got others
16 to break the law, and then I helped to hide these criminal
17 activities just as they are hiding them now.

18 I declare under penalty of perjury under the laws of the
19 State of Colorado that the foregoing is true and correct.

20 Executed this 21 day of June, 1999, at Boulder, Colorado

21
22 
23 Jesse Prince
24
25