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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

I, Michael Rinder, hereby declare and state:

1 declaration and if called as a witness, I could and would testify
2 competently thereto.

3 2. As a Director of CSI, I have seen the filings made by the
4 defendants and their lawyers in this case over the past six
5 months.

6 3. Clearly, the focus of the defendants has not been on
7 trying to disprove the defamation of which they were guilty or
8 even to address issues related to the defamation. Instead, they
9 have sought to turn this case into a witch hunt of the
10 Scientology religion. In doing so, the paid witnesses in this
11 case have specifically targeted the leader of the religion, David
12 Miscavige, for their abusive lies and outrageous accusations.

13 4. Why would defendants and their counsel devote such an
14 inordinate amount of attention to a non-party such as David
15 Miscavige? Why would defendants' counsel's mercenary witness
16 expose their lack of credibility so plainly by their resort to
17 such outrageous and false allegations about him when he never had
18 any involvement with Fishman, Geertz or this case? It is
19 apparent that their effort to denigrate the leader of the
20 religion is part of a campaign to create a false impression of,
21 and thereby, denigrate Scientology. The lies that have been
22 propagated in this case are vile beyond description. Their
23 purpose, as made clear by Graham Berry himself, is to use them as
24 a threat to extort funds from the Church. They have gotten away
25 with this barrage of lies so far, and as a consequence, Berry now
26 has the precedent of this case to use to create a future threat
27 that he hopes will prompt CSI to pay to make him take his lies
28 and go away.

1 5. David Miscavige prevented the Aznarans and Youngs from
2 carrying out what would have been a catastrophic turn of events
3 for the religion. Vicki Aznaran and Vaughn Young were involved
4 in a scheme to pervert the scriptures of L. Ron Hubbard for their
5 own profit. They were caught and stopped by David Miscavige. For
6 this, every Scientologist is grateful. Even then, they were given
7 the opportunity to redeem themselves within the Church. While
8 they now rail against Mr. Miscavige and unleash the foulest lies
9 about him their imaginations can concoct, any Scientologist would
10 have thought it totally proper under the circumstances for those
11 people to have been expelled from the Church without a chance for
12 mercy. However, he gave them another chance. I know that he
13 personally spent many hours with both Vicki Aznaran and Vaughn
14 Young trying to help them regain their self-respect. They
15 decided that rather than face those whom they had betrayed, that
16 they would leave staff. Mr. Miscavige even helped the Aznarans
17 to get themselves established in a new job. They were encouraged
18 to continue in Scientology and treated civilly, as even they have
19 testified elsewhere. Yet, all this being true, the Youngs and
20 Aznarans still have a deep-seated hatred for Mr. Miscavige and
21 have used this litigation to vent that hatred and to seek
22 millions of dollars for their silence. There is no justifiable
23 explanation for this, just as there is no explanation for savages
24 dismembering missionaries who work for years helping them
25 overcome poverty and disease. One can seek to help others and
26 treat people with compassion and dignity, but the blind hatred
27 harbored by a few cannot be restrained, no matter how hard one
28 might try.

1 6. These people have gathered around them a few others who
2 are bitter and harbor an unabiding resentment of Scientology and
3 what it stands for and for their own failures in the Church.
4 They view the Church as their "lottery ticket" and pursue their
5 jackpot with lies and threats at the expense of the millions of
6 happy and satisfied members who support the Church with their
7 time and donations. The Aznarans and Youngs are joined in that
8 pursuit by the likes of Hana Whitfield, Andre and Mary Tabayoyon,
9 Larry Wollersheim, Steve Fishman and Gerry Armstrong. Though
10 they either do not know David Miscavige, or had some remote
11 contact with him many years ago, they are willing to make
12 vindictive allegations, not based on personal knowledge or the
13 truth, and defame him personally and as the leader of the
14 religion. The tactic is as transparent as it is unconscionable
15 -- spread venom in the hope that the victims of the hate campaign
16 will eventually be forced to buy their silence so the Church can
17 get on with its real purpose of expanding the Scientology
18 religion and helping more people.

19 7. While these so-called experts have no personal knowledge
20 concerning David Miscavige, I do. I have known and worked with
21 him since 1976.

22 8. The sheer volume of despicable allegations made about
23 him are intended to create the false impression that where there
24 is smoke there is fire. These "witnesses" know only too well
25 from their experience in the Church that the tactic of telling
26 bigger and bolder lies has been a strategy employed against the
27 Church in litigation for years. Tell enough lies, and make
28 enough allegations, and an impression will be created which

1 accomplishes the end of destroying a reputation no matter how
2 untrue the allegations are. Public figures are especially
3 susceptible to this fraud as any study of history shows. Jesus
4 Christ was crucified based on the false accusations of Judas
5 Iscariot and the prejudice of the Romans.

6 9. Pontius Pilate listened to the lies about Jesus and the
7 Christians. The Germans bought the lies about the Jews.
8 Innocence does not prevent the lies from being told. And when
9 those lies fall on ears opened by bigotry and deaf to the truth,
10 irreparable harm is done. Defendants' tactics in this case are a
11 study in this technique.

12 10. I know David Miscavige personally. As such I know him to
13 be completely honest, and sincerely dedicated to helping people.
14 For what he has done to expand our religion, he has the respect
15 and admiration of millions of Scientologists. And for this same
16 reason, he has earned the enmity and particular scorn of those
17 with a vendetta against Scientology.

18 11. In the last decade, he has personally done more to
19 ensure Scientology is standardly applied and made more widely
20 known and available than any other single individual. After L.
21 Ron Hubbard, the Founder of Scientology, passed away in 1986, the
22 religion entered a new phase. While there will never be another
23 L. Ron Hubbard, his death marked a time of potential disruption
24 and upheaval, and Mr. Miscavige shouldered the responsibility for
25 not only keeping the scriptures pure, but for guiding our
26 religion into a time of great stability and rapid growth. He
27 never sought personal power or aggrandizement; he was thrust into
28 the position he currently holds precisely because he is so

1 dedicated to helping others through our religion. It is because
2 he has demonstrated time and time again his integrity and
3 selfless willingness to serve for the good of others that he
4 enjoys the support of the staff and parishioners of the
5 Scientology religion.

6 12. I have spoken to him often, and spent a considerable
7 amount of time working with him on various matters from the
8 positions I have held throughout the years. I know from my own
9 observation that he works sixteen hours a day, seven days a week
10 without respite for only one reason--his sincere dedication to
11 bettering the lives of others. He and his wife live in a single
12 motel-style room. He eats with the rest of the staff in the
13 communal dining room, he drives his own car and carries his own
14 bags. He regularly partakes in general group activities. It
15 would shock most people that anyone would work so hard for so
16 little material reward. It certainly gave pause to ABC News when
17 they saw it with their own eyes.

18 13. Until 1981, David worked, like hundreds of other Church
19 staff, in positions that dealt with the internal operations of
20 the religion. Apart from the staff he dealt with directly as
21 part of his duties, few knew who he was. I never heard an unkind
22 word said about him. That changed when he took action to protect
23 the future of the Church by taking over and disbanding the
24 Guardian's Office. This story has been recounted before, but
25 there are three things about it that bear repetition. First,
26 what he did took an enormous amount of courage, for with no
27 authority other than the moral authority of someone dedicated to
28 the well-being of our Church, he overthrew what was at the time

1 the most feared and powerful group in Scientology (that they were
2 feared is exactly why they had gone so far in contravention of
3 Church policy as they were only answerable to themselves).
4 Second, even after having achieved this feat, he did not seek a
5 high profile position or attempt to "take over" the Church. He
6 was happy to have those who were charged with running the Church
7 continue to do so and have no part of it. Third, the overthrow
8 of the Guardian's Office began what I have seen to be a virtually
9 unending history of personal attacks against him. He didn't
10 change, he merely became a known name and high-profile target.

11 14. Over the last thirteen years, I have seen a parade of
12 personal attacks levelled at Mr. Miscavige which would have
13 caused a less determined and less capable individual to give up
14 and relinquish the position of "lightning rod" for anyone seeking
15 to disrupt or destroy the Church. The first years saw attacks by
16 government agencies, since proven totally false and unfounded,
17 and documented by the government's own files gained through the
18 Freedom of Information Act. These attacks went on for more than
19 a decade. Government agencies amassed huge volumes of files on
20 him personally, and were aided by civil litigants who also jumped
21 on the bandwagon and targeted Mr. Miscavige with their spite and
22 malevolence. And in the face of this, when it would have been so
23 easy to give up and walk away, never to be vilified or attacked
24 again, I have seen him persist, because what he was doing in
25 Scientology is important and invaluable to all those who are
26 helped by L. Ron Hubbard's technology. That determination was
27 buttressed by the fact that none of the accusations made about
28 him were true.

1 15. Mr. Miscavige is very approachable and friendly. He
2 gives regular briefings to Scientology parishioners and staff in
3 our Churches around the world. I estimate that he does such
4 public briefings about 35 times a year. He stops and talks with
5 the staff and public everywhere he goes. I have been with him on
6 many occasions where he has stayed until the early morning hours
7 to talk to individuals who remained after one of his briefings.
8 It is remarkable how many people know him and approach him as a
9 friend. Thousands write to him to request his assistance on a
10 wide variety of topics, and he always takes the time to help or
11 see that help is gotten.

12 16. It is David Miscavige who has been the driving force in
13 getting every single book, and all the materials of the
14 Scientology Grade Chart, fully and strictly in accordance with
15 the writings of L. Ron Hubbard. Every Scientologist is eternally
16 thankful for this because it means the full availability of the
17 complete Scientology scriptures as written or spoken by Mr.
18 Hubbard. He took no credit for this accomplishment, though those
19 of us who are aware of the enormous amount of time he spent
20 working to make this goal a reality know that the credit he so
21 graciously gave to others, in fact, belonged to him.

22 17. Perhaps less important in his eyes than what he does
23 internally in the Church, he has directly and personally given a
24 new face to Scientology through his appearances in the media,
25 responding eloquently and effectively to the same, discredited
26 allegations that have been again dragged into this case.

27 18. And it is also David Miscavige who made the tax
28 exemption by the IRS possible. It is he who personally walked

1 into the front lobby of the IRS National Headquarters and through
2 two years of persistent work, ultimately brought about a peace
3 with the IRS that had seemed impossible. But perhaps the most
4 telling point is this: it was the IRS targeting individual
5 Scientologists, merely because they were Scientologists, that
6 motivated him the most in this endeavor. Again, he didn't take
7 credit for this, he has told me many times that he felt it was
8 his duty to all Scientologists to carry this off so they would be
9 free to practice their religion just like those of other faiths.

10 19. I have observed through the years David's dedication to
11 helping his fellow staff in the Church. It is he who has raised
12 the standards and conditions for staff members by insisting on
13 constantly upgraded living quarters, dining areas and other staff
14 facilities. It is he who has insisted on staff enhancement
15 programs, and recreational facilities being provided for the
16 staff of the Church. Absurd allegations of slave labor being
17 employed in the Church turn my stomach. I know the truth. They
18 are lies, and those who utter them know them to be lies.

19 20. Mr. Miscavige has been the driving force in establishing
20 the ideal school where my children have an environment free from
21 drugs and crime. My children and their peers know him as a
22 friend and think the world of him for his thoughtfulness and care
23 for their well-being and their education.

24 21. I know his compassion from personal experience. While
25 Vicki Aznaran makes cruel claims concerning the death of my
26 infant daughter, she does not know what in fact occurred, or if
27 she does, she is simply lying to try to create a false
28 impression. In this time of great personal upset, David and his

1 wife Shelly supported my wife and me beyond what could possibly
2 be expected by anyone--seeing to our personal needs, arranging
3 for the most highly trained auditors to give us spiritual
4 counselling, arranging plane fares and reservations, helping with
5 the funeral arrangements and making it as easy as possible in
6 every fashion imaginable for us to come through this upsetting
7 time. I resent any implication that has been made to the
8 contrary by Vicki Aznaran--her statements are beneath contempt.

9 22. On many occasions I have seen David go out of his way to
10 help others. I well recall two times where I took ill and it was
11 David who called the doctor and personally ensured that
12 everything possible was done to help me recover. He contacted the
13 doctor (both occasions were late at night and required tracking
14 down doctors in the middle of the night) and ensured I was
15 properly treated. It would have been easy for him to let someone
16 else take care of me, but he did so personally, and would not
17 leave or rest until the matter was resolved. These are things I
18 will never forget.

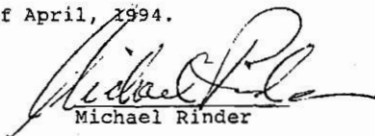
19 23. I have seen him act in a similar fashion with many
20 others. As I work with him often, and know many of the people
21 that know him, I am aware of the high regard in which he is held
22 by Scientologists and those he comes in contact with. I have
23 never heard a negative statement made about him by anyone other
24 than those who seek to extort money from the Church. It really
25 is that simple.

26 24. Comparing what I know to what I read in the declarations
27 of these paid "witnesses," makes the lies even more vivid and
28 callous. There is no resemblance to the individual I know that

1 can be drawn from the innuendo, allegations and falsehoods that
2 are written about him. To believe the statements of this tiny
3 handful of spiteful apostates, in the face of such overwhelming
4 evidence to the contrary, would be to listen to the testimony of
5 Judas Iscariot. Their lies are no less bold, baldfaced or
6 malicious.

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

9 Executed this 11th day of April, 1994.

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12 Michael Rinder
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