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2/7/94

14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 CHURCH OF SCIENTOLOGY
17 INTERNATIONAL, a California Non-
18 Profit Religious Organization,
19 Plaintiff,
20 vs.
21 STEVEN FISHMAN and UWE GEERTZ,
22 Defendants.

) CASE NO.
) CV 91-6426 HLH (Tx)
)
) DECLARATION OF
) GUILLAUME LESEVRE

23 I, GUILLAUME LESEVRE, declare as follows:

24 1. I am over eighteen years of age and a resident of the
25 State of California. I am a director of plaintiff, Church of
26 Scientology International (CSI). I have personal knowledge of
27 the matters set forth herein and, if called upon to do so, could
28 and would competently testify thereto.

2. I have been a member of the Sea Organization, the
religious order within the Scientology religion, since 1974.
Throughout my twenty years as a Sea Organization member, I have

1 held various positions in different Churches of Scientology in
2 different parts of the world. I have held my present position as
3 Executive Director International, in CSI, since 1982.

4 3. In one of the declarations of Robert Vaughn Young filed
5 by the defendants in this action, Young makes the assertion that
6 only the most dedicated Scientologists are permitted to join the
7 Sea Organization. I can state with personal knowledge that
8 Young's statement is false. I personally had no Church staff
9 experience when I joined the Sea Organization. I joined the Sea
10 Organization after hearing an introductory lecture on the
11 Scientology religion. I had no Scientology experience or
12 background prior to my joining the Sea Organization.

13 4. CSI is the Mother Church of the Scientology religion.
14 Its function is to guide subordinate churches and ensure the
15 expansion of the Scientology religion around the world. CSI
16 broadly plans and coordinates the overall expansion of the
17 Scientology religion through specialized training programs for
18 church executives and staff; through the creation and provision
19 of programs to individual churches and groups and help in
20 implementing programs for expansion; through the distribution of
21 Scientology scriptures in written and audiovisual form; through
22 the production of religious training films, slide shows and
23 videos and the recorded lectures of the Founder of the
24 Scientology religion, L. Ron Hubbard; and through the provision
25 of ecclesiastical management and guidance to individual Churches
26 of Scientology. At no time during my tenure as Executive
27 Director International did Vaughn Young ever hold any position of
28 any authority with respect to any of these functions.

1 5. Ecclesiastical assistance from CSI also includes a vast
2 array of tangible materials, including materials for magazines
3 Churches send out to parishioners, booklets, pamphlets, films,
4 videos, slide shows, and expansion programs. These materials are
5 provided by my staff under my supervision. CSI has a staff of
6 1,500 people working full time on a permanent basis. At no time
7 during my tenure as Executive Director International did Vaughn
8 Young ever hold any position of any authority with respect to any
9 of those functions.

10 6. As the Executive Director International, I am in charge
11 of the management of CSI. I oversee a staff which provides
12 international planning and programming to further the expansion
13 of the Scientology religion. I direct and authorize new
14 international plans and programs for the dissemination of the
15 religion in all parts of the world. I am responsible for
16 overseeing the training of executives for the Churches around the
17 world. In coordination with the Watchdog Committee, I approve
18 the appointment of Senior Executives of CSI to ensure they
19 satisfy the training, experience, honesty, integrity and
20 responsibility levels required for such positions of trust. At
21 no time during my tenure as Executive Director International did
22 Vaughn Young ever hold any position of any authority with respect
23 to any of these functions.

24 7. As the Executive Director International, I am
25 responsible for the overall expansion of the Church, and it is my
26 function to direct that expansion. I coordinate all
27 ecclesiastical management activities at an international level,
28 and provide planning and programming for expansion of the

1 Scientology religion. Immediately beneath the Executive Director
2 International is the Senior Executive Strata, which is composed
3 of twelve executives who act as my staff. The Executive Director
4 International and the Senior Executive Strata do not directly
5 manage individual Churches of Scientology. Rather, we provide
6 plans, strategies, data analyses and programs local churches may
7 use. The Flag Bureaux, another management organization, also
8 contained in CSI, sees that such programs are provided to
9 individual Churches. At no time during my tenure as Executive
10 Director International did Vaughn Young ever hold any position of
11 any authority with respect to any of these functions.

12 8. I report to the Chairman of the Watchdog Committee, the
13 ecclesiastical head of CSI. There is no other Church executive
14 who is senior to me or to whom I report. The functions of the
15 Watchdog Committee and its Chairman are different from my duties.
16 Those ecclesiastical bodies see to it that the management
17 functions performed by CSI are carried out in accordance with the
18 policies of the Church.

19 9. In my twenty years in the Sea Organization, I met Vaughn
20 Young approximately six times. Vaughn Young was never a senior
21 executive in the ecclesiastical hierarchy of the religion of
22 Scientology. If Vaughn Young had ever held any of the key
23 positions that he claims he had in the Church, I would have
24 worked with him. I never worked with Vaughn Young.

25 10. I am aware that CSI has brought this action against
26 defendants Steven Fishman and Uwe Geertz as a result of
27 statements made by them about CSI as published in the May 6, 1991
28 issue of Time magazine. I have read the Time magazine article

1 and the statements attributed to defendants in that article
2 shortly after it was published. My understanding at the time
3 that I read that article, and to this day, is that statements
4 made by defendants in referring to "the church" and to
5 "Scientology" were intended to refer to and did refer to CSI.

6 11. I have never met nor spoken to either Steven Fishman or
7 Uwe Geertz. I have not personally corresponded with either of
8 these defendants, however, I have reviewed correspondence to my
9 office from Fishman concerning a request for return of monies he
10 had deposited for reel-to-reel taped lectures. Mr. Hubbard's
11 lectures recorded between 1950 and 1968 number in the thousands,
12 and it is an ongoing project of CSI's to reproduce these lectures
13 on cassette so they are available to the public at large. The
14 taped lectures Mr. Fishman requested were not yet available at
15 the time of his payment. I am informed that Fishman received a
16 full refund of his deposit.

17 12. I am aware that defendants in this action claim that
18 there is a policy within the Church regarding "EOC" or "End of
19 Cycle" which allegedly means suicide. There is no policy or
20 writing of L. Ron Hubbard which would even remotely condone,
21 require, or even suggest either suicide or murder, nor have I
22 ever heard of any member of any Church of Scientology being
23 "ordered" to commit suicide or murder.

24 13. It is my understanding that defendants have hired
25 former Scientologists Vaughn Young and Stacy Young to assert in
26 declarations that the Chairman of the Board of Religious
27 Technology Center, David Miscavige, is a "managing agent" of CSI
28 or controls CSI. I understand that the Youngs' statements have

1 also disparaged Mr. Miscavige's character and claim that he
2 "controls" every Scientologist in the world. This
3 characterization offends me personally as by inference it
4 invalidates my very beingness as an individual. I have known Mr.
5 Miscavige for more than eleven years, and I know those
6 allegations and aspersions are completely false. Mr. Miscavige
7 is not an officer, director or employee of CSI and has not been
8 an employee of CSI in any capacity in the nearly twelve years
9 that I have been with CSI. Mr. Miscavige is the Chairman of the
10 Board of the Religious Technology Center (RTC), a separate
11 organization which has functions which are completely different
12 from those of CSI. RTC owns and maintains all of the trademarks
13 and service marks of Dianetics and Scientology. RTC is not part
14 of the management structure of CSI, and neither is Mr. Miscavige.

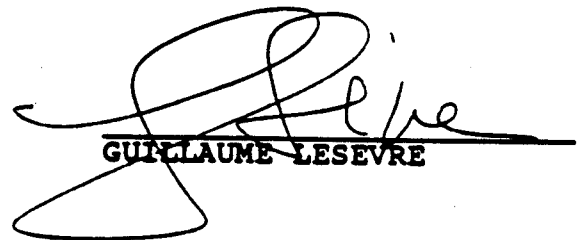
15 14. As an executive of CSI for over a decade, I have
16 personal knowledge that CSI is operated and managed only by its
17 own staff, officers and directors. CSI maintains its own
18 accounts, separate from any other Church of Scientology. CSI
19 does not employ any staff which are also employed by any other
20 Church of Scientology. The officers, directors and executives of
21 CSI conduct the day-to-day affairs of CSI and are solely
22 responsible for the planning of CSI's affairs and the
23 implementation of that planning.

24 15. I am aware that defendants and their hired witnesses,
25 the Youngs, have made various bizarre and unsubstantiated
26 allegations regarding CSI's finances. Neither Vaughn nor Stacy
27 Young has ever held any position within CSI which would give them
28 any personal knowledge of CSI's finances. The very nature of the

1 statements they have made only serve to illustrate their total
2 ignorance of CSI's corporate, financial, and ecclesiastical
3 affairs and activities. CSI was recently recognized by the
4 Internal Revenue Service as fully tax exempt and authorized the
5 Mother Church of the Scientology religion in turn to grant
6 exemption to other Churches of Scientology under its supervision.
7 This came as the result of an extensive, two and a half year
8 review of all of CSI's financial records by the IRS, as well as
9 those of other Scientology churches and organizations. At the
10 end of this review, the IRS found that the Church was "operated
11 exclusively for religious and charitable purposes" and issued
12 individual and group exemption letters to cover all Scientology
13 Churches and Missions within the United States. The IRS found no
14 evidence to substantiate pejorative claims such as those made by
15 the defendants or the Youngs.

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

18 Executed this 7 day of February, 1994, at Riverside
19 County, California.

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21 
22 GUILLAUME LESEVRE
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