

CAUSE NO. C-2013-1082B

MONIQUE RATHBUN	§	IN THE DISTRICT COURT
	§	
v.	§	207 TH JUDICIAL DISTRICT
	§	
DAVID MISCAVIGE, RELIGIOUS	§	
TECHNOLOGY CENTER, CHURCH	§	
OF SCIENTOLOGY	§	
INTERNATIONAL, STEVEN	§	
GREGORY SLOAT, AND	§	
MONTY DRAKE	§	COMAL COUNTY, TEXAS

PLAINTIFF'S FIRST AMENDED PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

The Plaintiff, Monique Rathbun, brings this action against the Defendants, David Miscavige, Religious Technology Center (“RTC”), Church of Scientology International (“CSI”), Steven Gregory Sloat, Monty Drake, Dave Lubow a/k/a David J. Labow, and Ed Bryan, and for causes of action shows the following:

DISCOVERY CONTROL PLAN

1. The Plaintiff intends to conduct discovery under Level 3 of Rule 190 of the Texas Rules of Civil Procedure.

PARTIES AND SERVICE OF PROCESS

2. Mrs. Rathbun is a resident of Comal County, Texas. David Miscavige has appeared herein and is being served by serving his counsel of record, Lamont A. Jefferson, Haynes & Boone, LLP, 112 E. Pecan Street, Suite 1200, San Antonio, Texas 78205-1540. Religious Technology Center has appeared herein and is being served by serving its counsel of record, Lamont A. Jefferson, Haynes & Boone, LLP, 112 E. Pecan

Street, Suite 1200, San Antonio, Texas 78205-1540. Church of Scientology International has appeared herein and is being served by serving its counsel of record, Les J. Strieber III, Davis, Cedillo & Mendoza, McCombs Plaza, Suite 500, 755 E. Mulberry Ave., San Antonio, Texas 78212. Steven Gregory Sloat is an individual residing in Houston (Bellaire), Texas. He may be served by serving him at 4907 Beech Street, Bellaire, Texas 77401. Monty Drake is an individual residing in Granbury, Hood County, Texas. He may be served by serving him at 1620 Malibu Bay Ct., Granbury, Texas 76048.

3. Dave Lubow a/k/a David J. Labow, is a California resident doing business in Texas. He may be served with process and this pleading by serving the Secretary of State of Texas at 1019 Brazos Street, Austin, Texas 78701, as its agent for service. A copy of same may be mailed to Dave Lubow a/k/a David J. Labow at 26501 Torrey Pines, Newhall, Santa Clarita, CA 91321-2235.

4. Ed Bryan is a California resident doing business in Texas. He may be served with process and this pleading by serving the Secretary of State of Texas at 1019 Brazos Street, Austin, Texas 78701, as its agent for service. A copy of same may be mailed to Ed Bryan at 2808 N. Naomi Street, Burbank, CA 91504-2023.

SUBJECT MATTER JURISDICTION

5. This action is a suit for injunctive relief and damages in an amount within the jurisdictional limits of this Court. The Plaintiff seeks monetary relief over \$1,000,000.

PERSONAL JURISDICTION

6. Mr. Miscavige, RTC, CSI, Mr. Labow, and Mr. Bryan are subject to personal jurisdiction in Texas. Texas courts have general jurisdiction over Mr. Miscavige, RTC, CSI, Mr. Labow and Mr. Bryan because they have a substantial

connection with Texas due to their continuing and systematic contacts purposefully directed toward Texas. Also, Texas courts have specific jurisdiction over these Defendants because they have a substantial connection with Texas due to the fact that this cause of action arises out of or relates to their contacts with Texas. Mr. Sloat and Mr. Drake are citizens and residents of Texas, where they do business

VENUE

7. Comal County is a county of proper venue, because it is a county in which a substantial part of the events or omissions giving rise to the claim occurred and are still occurring.

FACTS

8. Monique Rathbun (formerly, Monique Carle) was 33 years old in 2005, when she met and fell in love with her future husband, Mark Rathbun. Eventually, Mr. and Mrs. Rathbun made their home in Ingleside On The Bay, Texas, and they were wed on July 3, 2010. Although this case involves Scientology, Mrs. Rathbun is not, nor has she ever been, a member of the Church of Scientology. The Church of Scientology is a notorious, multi-billion dollar cult.

9. Mrs. Rathbun learned at the outset of her romance with Mr. Rathbun that he was a former member of the Church of Scientology. In fact, Mr. Rathbun had devoted 27 years of his life to the service of Scientology. He was the second highest ranking official in Scientology's hierarchy. Mr. Rathbun worked directly with David Miscavige, Scientology's supreme leader. Mr. Miscavige, who refers to himself as the "Pope of Scientology," wields absolute control over all Scientology corporate operations, including the operation made the basis of this suit.

10. By 2004, Mr. Rathbun realized that he could no longer abide Mr. Miscavige's illegal and immoral misconduct, especially Miscavige's physical and mental abuse of devoted Scientology clergy. Mr. Rathbun escaped from Scientology's secretive, secure compound in the California desert, and made his way to South Texas, where he lived in anonymity. Mr. Rathbun's disappearance from his life in Scientology was so effective that he was rumored to be dead. In fact, it was reported in Wikipedia that he had died of cancer. During those quiet years, Mr. and Mrs. Rathbun met, married, and began their new life on the Texas coast.

11. Mr. Rathbun was living in relative seclusion in Texas. He had no contact with his family and friends, who remained in Scientology and who were prohibited by the Church of Scientology from having any communication or connection with him. There is a department within the Church of Scientology dedicated to full-scale attack against anyone who questions or criticizes Mr. Miscavige's reign over the Scientology corporations. That organization is called the Office of Special Affairs ("OSA"). OSA employs a cadre of lawyers, investigators, public relations personnel, and shady operatives to destroy anyone identified as an attacker of Scientology. For several years, Mr. Rathbun kept quiet and avoided the attention of OSA.

12. In 2009, Mr. Rathbun exercised his rights under the Texas and United States Constitutions to speak out against Mr. Miscavige's criminal mistreatment of Scientology clergy. The Plaintiff, Monique Rathbun, did not join her husband in speaking out concerning Scientology issues, nor has she ever taken a public position regarding Scientology. Her few public comments have related to the ongoing harassments against her husband and her. Mrs. Rathbun was never a member of the Church of Scientology.

In no way was she an “attacker” of Scientology. Her only involvement was her marriage to a prominent former Scientologist.

13. Nevertheless, Mrs. Rathbun has been intentionally targeted by OSA merely because of her relationship with Mr. Rathbun. Under Scientology’s written policies and procedures, it is “fair game” to threaten that which an enemy seeks to protect. To Scientology, Mr. Rathbun is an enemy, and his beloved wife is “that which he seeks to protect.” Accordingly, OSA and its co-defendants have engaged in three years of ruthlessly aggressive misconduct against Mrs. Rathbun. This abusive campaign continued, unabated, as of the filing of this suit.

14. The Defendants have worked around the clock for three years to destroy Mrs. Rathbun. She has been harassed, insulted, surveilled, photographed, videotaped, defamed, and humiliated to such a degree as to shock the conscience of any decent, law-abiding person. She has been subjected to numerous, aggressive attempts to intimidate her. Each and all of the Defendants have participated enthusiastically in this abuse, without regard to Mrs. Rathbun’s basic rights as a human being. She has been targeted at home, at work, and anywhere else that she happens to be.

15. As a direct result of the Defendants’ relentless campaign, Mrs. Rathbun and her husband were driven from their cherished home in Ingleside On The Bay. They moved to a more secluded residence in Comal County in the hope of obtaining the ordinary privacy and tranquility to which they are entitled. Unfortunately, their respite was short-lived. The Defendants have resumed their activities against Mrs. Rathbun in Comal County. Mrs. Rathbun believes that she has no choice but to bring this suit to end the Defendants’ assault upon her privacy, her tranquility and peace of mind, her right to

work, and her right to freely associate with friends and co-workers free from intrusion, surveillance, harassment, and embarrassment.

ADDITIONAL JURISDICTIONAL FACTS

16. David Miscavige and RTC have complained that the Plaintiff's Original Petition failed to plead specific facts to support personal jurisdiction over them in Texas. Plaintiff disagrees, but in an abundance of caution, the following additional factual allegations are provided.

17. This case arises from a planned, calculated, multiyear operation of Scientology's Office of Special Affairs ("OSA") in Texas. To the profound suffering of Mrs. Rathbun, she has been the innocent victim of OSA's primary function -- the destruction of anyone deemed an enemy of David Miscavige and/or Scientology. David Miscavige is the absolute, unquestioned authority in Scientology's corporate activities, and he decides who is an enemy to be attacked.

18. Although it is ostensibly an office within the Church of Scientology International, OSA reports directly to David Miscavige at RTC. Mr. Miscavige's personal obsession is the "handling" of Scientology defectors, termed "Squirrels" or "Suppressive Persons". The more significant the defecting Scientologist, the more obsessive is Mr. Miscavige's response.

19. No defector from the Church of Scientology is more prominent than Mr. Rathbun, which explains OSA's "scorched-earth" campaign against him, and its willingness to attack even his innocent wife. Mr. Miscavige was particularly concerned about Mr. Rathbun, because of their close, long-term working relationship.

20. In 2004, Mr. Rathbun escaped on a motorcycle from Scientology's secretive desert compound in California. The level of violence and human rights abuses committed by, and at the direction of, Mr. Miscavige had risen dangerously. Mr. Rathbun fled to Texas where he lived quietly, away from the attention of Mr. Miscavige and his OSA thugs. It was during this peaceful interlude that the Rathbuns began their relationship.

21. In 2009, Mr. Rathbun broke his silence and spoke to the national media about Mr. Miscavige's shocking culture of violence in Scientology's desert compound. In the eyes of Mr. Miscavige, Mr. Rathbun became his primary enemy. It was for such enemies that Mr. Miscavige created the Office of Special Affairs.

22. Mr. Miscavige is the one and only person in the Church of Scientology who may authorize a destructive OSA campaign, such as the one undertaken against the Rathbuns. Thus, according to the routine, consistent, decades-long practice of the Scientology organizations, Mr. Miscavige authorized OSA's campaign against the Rathbuns. Consistent with Mr. Miscavige's longtime, established habit, he personally monitored and micromanaged OSA's operations against the Rathbuns.

23. In 2009, Linda Hamel, the head of OSA, dispatched OSA's top agents to Texas. Paul Marrick and Greg Arnold were pulled off of their decades-long surveillance of former Scientology leader, Pat Broeker, and sent to Ingleside On The Bay, Texas to plan a sophisticated surveillance operation against the Rathbuns. OSA already had a Texas agent, Monty Drake, in place, but Marrick and Arnold were needed because of their superior skills.

24. Mr. Miscavige, RTC, and OSA had employed Monty Drake in Texas since the 1990's. Mr. Miscavige was well aware of Monty Drake, whose name Mr. Miscavige thought was humorous, and whose investigative reports were handed to Mr. Miscavige for his personal attention.

25. Mr. Marrick and Mr. Arnold carried out their Texas assignment for OSA. They regularly reported by telephone to Ms. Hamel during their work in Texas. They also submitted a written report to Ms. Hamel. The report detailed their observations, evaluation, and recommendations for the OSA operation against the Rathbuns in Ingleside On The Bay. Over their long career with OSA and RTC, Ms. Hamel passed information and reports from Marrick and Arnold directly to Mr. Miscavige, code named "The Duke".

26. Later, after OSA's outrageous "Squirrel Busters" operation against the Rathbuns became notorious in the media, Ms. Hamel, the head of OSA who reports directly to Mr. Miscavige, replied that "we" sent the Squirrel Busters to Texas to "make Marty implode."

27. On or about May 25, 2010, Warren McShane, President of RTC, made a report to the Sheriff of Riverside County, California concerning a recent Scientology Defector. Mr. McShane reported to the Sheriff, as follows:

"Mr. McShane . . . began to suspect that [the defector] would attempt to meet up with Marty Rathbun, who was described to me as a former church member, and now Church of Scientology antagonist. Mr. McShane told me RTC had previously contracted with a private security firm in the State of Texas to monitor Mr. Rathbun's activities. Mr. McShane contacted the security firm and provided them with [the defector's] photo and information and asked that he (McShane) be contacted in the event [the defector was seen meeting with Mr. Rathbun. According to Mr. McShane, [the defector] was spotted by the security detail on April 24, 2010 meeting with Mr. Rathbun at a restaurant in the City of Ingleside, Texas."

“Mr. McShane summoned (4) church members/employees who know [the defector] the best and sent them to Texas to attempt to contact him and perhaps persuade him to return to the facility in Hemet, CA.”

Mr. Miscavige has often said that the only reason he keeps Mr. McShane in his position at RTC is that Mr. McShane is "an unusually good liar." Presumably, however, Mr. McShane had no reason to lie to the Riverside, California Sheriff's Office about RTC's ongoing activities in Texas.

28. The Squirrel Busters operation against the Rathbuns is an important basis of this lawsuit. Ed Bryan was sent by OSA from California to join the Squirrel Busters in Texas. On July 13, 2011, Mr. Bryan wrote the following concerning the Church's Texas operation against the Rathbuns:

“This is in co-ordination with OSA Int. [Office of Special Affairs – Church of Scientology International]. They are calling the shots and quite frankly I don't think it is very effective. The reporters came to our house the other day and we didn't tell them very much. Our main guy went back to discuss with them a different strategy. The rat [Rathbun] is getting more brazen and yesterday I actually had a 1 minute comm cycle [conversation] with him while he was on a walk. The guy is nuttier than a fruitcake. He's gone off the deep end. Taking him down will be no easy task. I just hope he self destructs before he does more damage to our church. He has gotten to some OTVIII's and I just can't think with how stupid they are to actually believe what he is saying.” *Bracketed information added.*

29. Another Squirrel Buster from California was Joanne Wheaton. While she was in Texas, hounding the Rathbuns, she received regular written instructions from OSA, micromanaging the Squirrel Busters' activities. No detail was too trivial to escape the attention of Mr. Miscavige's agents, as exemplified by the following excerpts from an email to her, dated September 3, 2011:

"You should brief the SQBs [Squirrel Busters] on the following:

"A couple of points need to be handled. The SQBs still look downstat [derogatory term among Scientologists]. They went out without their shirts tucked in and it looks unprofessional on camera. The badges also look tacky. These points still need to be upgraded / corrected.

"He [Rathbun] is much more enturbulated [Scientology term for a disturbed state of mind] when people ignore him and go right on telling him that he is not a Scientologist, that he is a suppressive person, that we love and totally support COB [David Miscavige] and all he is doing for Scientology, that Rathbun is a complete disgrace, is an insane psychotic squirrel whose entire purpose is to destroy the tech. He is anti-Scientology as all his actions show.

"That's the viewpoint they need to have. We love COB [David Miscavige] and hate SP squirrels like you.

"People who are to deal with Rathbun need to read some references and drill. They are not to engage in any more discussions with him."
Bracketed information added.

30. Bert Leahy, a non-scientologist videographer from Dallas, Texas, was hired under false pretenses by the Squirrel Busters to join them in Ingleside On The Bay. Mr. Leahy then learned the true nature of the job from an unsavory character operating under the false name of "Dave Stater". In actuality, Mr. Stater was Dave Lubow, a California private investigator, who has performed "dirty tricks" operations for Mr. Miscavige, RTC, and OSA for more than 30 years. Mr. Lubow's unscrupulous nature is prized by Mr. Miscavige. Mr. Lubow told Mr. Leahy in no uncertain terms:

"Our goal is to make Marty's life a living hell . . . with every means possible of impeding his everyday living, and make it so miserable for him and his neighbors that his neighbors will want him to move."

The virulence of the Squirrel Busters was also directed against Mrs. Rathbun. Joanne Wheaton told Mr. Leahy that Mrs. Rathbun “made her blood boil” and that she “couldn’t stand the sight of her [Mrs. Rathbun].”

31. Mr. Leahy soon sickened of his participation in the Squirrel Busters' Texas operation against the Rathbuns. But, before he quit, he observed that the Squirrel Busters seemed to have an unlimited budget, and its leaders received instructions and made reports by cell phone to Los Angeles. OSA's headquarters are located in a Los Angeles Scientology building, along with offices of Mr. Miscavige and RTC.

32. On July 20, 2011, the attorney for Squirrel Busters Productions, Richard W. Rogers, III, of Corpus Christi, Texas wrote to the County Attorney of San Patricio County, where the Squirrel Busters' operation against the Rathbuns was ongoing. The letter is unremarkable, except for the fact that it was cc'd to Allan Cartwright, OSA's Director of Legal Affairs. Mr. Cartwright answers to Mr. Miscavige at RTC.

33. The official spokesperson for the Church of Scientology, Karin Pouw, has written:

“I further wish to point out that the Church has put out videos which show Rathbun lying in his own words, based on his own statements. To that end I further invite you to watch the video at this link showing Rathbun’s nature: <http://www.whoismartyrathbun.com/>.”

The video footage in question was the Squirrel Busters' video recording of the Rathbuns in Texas. Previously, the Church denied any connection to the Squirrel Busters. Furthermore, the referenced website is one of approximately 35 “hate sites” established by the Church to attack Mr. and Mrs. Rathbun.

34. Texas private investigator, Monty Drake, whose name Mr. Miscavige found to be so amusing, carried out many of the Defendants' operations against the Rathbuns. Of significance, he entered into two 3-year leases of a house across the street from the Rathbuns' home in Ingleside On The Bay, Texas. Mr. Drake installed in the leased house an array of high-powered surveillance video and still cameras aimed at and into the Rathbuns' home. The cameras were connected to a computer system that stored and transmitted the Rathbuns' images to California to satisfy Mr. Miscavige's obsessive interest.

35. None of the Defendants' tortious activities in Texas, which continued until this Court's Temporary Restraining Order was issued, could have been performed without authorization by David Miscavige, who is the head of RTC and the unquestioned ruler of all Scientology organizations. No one else in any Scientology organization has the authority to approve such an operation. Furthermore, any and all of these unlawful activities in Texas could have been stopped instantly by a single word from Mr. Miscavige. Mr. Miscavige approved and ratified these activities. Official and unofficial Church spokespersons and publications have vilified and attacked the Rathbuns throughout their ordeal. Church funds have financed the Rathbun campaign in Texas, and Church personnel have staffed it.

36. Mr. Miscavige may have been careful to keep his body outside of Texas, but he personally directed several OSA operations in Texas before the Rathbun operation. Established principles of fair play and substantial justice dictate that he should be made to answer these allegations concerning his deliberate, tortious activities against Texas citizens in a Texas courtroom, before a Texas jury.

CAUSES OF ACTION

37. **Intentional Infliction of Emotional Distress.** The Defendants' misconduct, as described above, constitutes intentional infliction of emotional distress, for which Mrs. Rathbun hereby sues. The Defendants acted intentionally or recklessly, and Mrs. Rathbun has suffered, and is suffering, severe emotional distress. The Defendants' misconduct is extreme and outrageous, and proximately caused Mrs. Rathbun's emotional distress. No alternative cause of action would provide a remedy for the severe emotional distress caused by the Defendants' misconduct.

38. **Tortious Interference With Contract.** The Defendants' misconduct, as described above, constitutes tortious interference with contract, for which Mrs. Rathbun hereby sues. Mrs. Rathbun has had a valid contract of employment with her employer. The Defendants have willfully and intentionally interfered with the contract. The Defendants' interference has proximately caused injury to Mrs. Rathbun, and she has incurred actual damages or loss.

39. **Invasion of Privacy - Intrusion on Seclusion.** The Defendants' misconduct, as described above, constitutes invasion of privacy by intrusion on seclusion, for which Mrs. Rathbun hereby sues. The Defendants intentionally intruded on Mrs. Rathbun's solitude, seclusion, or private affairs. Such intrusion would be highly offensive to a reasonable person. Mrs. Rathbun suffered injury as a result of the Defendants' intrusion.

40. **Invasion of Privacy – Public Disclosure of Private Facts.** The Defendants' misconduct, as described above, constitutes invasion of privacy by public disclosure of private facts, for which Mrs. Rathbun hereby sues. The Defendants

publicized information about Mrs. Rathbun's private life, which would be highly offensive to a reasonable person, and which is not of legitimate public concern. Mrs. Rathbun has suffered injury as a result of the Defendants' disclosure.

INJUNCTIVE RELIEF

41. Mrs. Rathbun is entitled to a Temporary Restraining Order, Temporary Injunction, and Permanent Injunction prohibiting the Defendants from interfering with her employment, from invading her privacy, and from inflicting emotional distress upon her. There is substantial risk of imminent harm and irreparable injury to Mrs. Rathbun. Her damages, by their nature cannot be measured by any certain pecuniary standard. She seeks ex parte consideration of this request for Temporary Restraining Order to prevent further irreparable injury and to preserve the status quo pending a hearing on her request for Temporary Injunction and final trial.

DAMAGES

42. **Actual Damages.** As a direct result of the Defendants' unlawful conduct, Mrs. Rathbun has suffered and will continue to suffer recoverable actual damages within the jurisdictional limits of this Court, including but not limited to, mental anguish damages, loss of earning capacity, damage to reputation, and financial loss.

43. **Exemplary Damages.** The Defendants' unlawful conduct was of such a degree and character as to make them liable for exemplary damages within the jurisdictional limits of this Court.

VICARIOUS LIABILITY

44. The Defendants' misconduct, as described above, makes them liable for each other's actions and the actions of their employees and agents under theories of

assisting or encouraging, assisting and participating, concert of action, conspiracy, agency, partnership, joint enterprise, piercing the corporate veil, and respondeat superior.

AMENDMENT AND JOINDER

45. Mrs. Rathbun expressly reserves the right to amend her pleadings and to join additional parties, as needed.

REQUEST FOR DISCLOSURE

46. The Plaintiff requests that the Defendants disclose, pursuant to Texas Rule of Civil Procedure 194, the information or material described in Rule 194.2(a)-(l).

PRAYER

WHEREFORE, PREMISES CONSIDERED, the Plaintiff prays that upon trial hereof, she be awarded judgment against the Defendants for injunctive relief, actual damages, exemplary damages, court costs, pre-judgment interest, post-judgment interest, and such other and further relief to which she may be justly entitled at law or in equity.

Respectfully submitted,

JEFFREY & MITCHELL, P.C.

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ATTORNEYS FOR MONIQUE RATHBUN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forward via *facsimile* to the following counsel of record in this cause in accordance with the Texas Rules of Civil Procedure on this the 4th day of September, 2013:

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Ray B. Jeffrey

CAUSE NO. _____

MONIQUE RATHBUN

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IN THE DISTRICT COURT

v.

_____ JUDICIAL DISTRICT

DAVID MISCAVIGE, RELIGIOUS
TECHNOLOGY CENTER, CHURCH
OF SCIENTOLOGY
INTERNATIONAL, STEVEN
GREGORY SLOAT, AND
MONTY DRAKE

COMAL COUNTY, TEXAS

AFFIDAVIT OF MONIQUE RATHBUN

Before me, the undersigned notary, on this day personally appeared Monique Rathbun, the affiant, a person whose identity is known to me. After I administered an oath, affiant testified:

1. "My name is Monique Rathbun. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am married to Mark Rathbun, a prominent former Scientologist. For several years, we led a quiet, rewarding life together on the Texas coast before the Defendants started their campaign of harassment and intimidation against us.

3. In 2009, my husband broke his silence about Scientology. He gave national media interviews about physical and mental abuse he witnessed at Scientology's headquarters in California. I have never been a Scientologist. I gave no interviews, nor did I speak out publicly concerning these matters.

4. Within a week of my husband's first media interviews, we were both put under surveillance by Scientology operatives. We have now been living under this constant surveillance and harassment for four years.

5. On several occasions when my husband travelled out of town, Scientologists appeared at our home after dark to interrogate me aggressively. These unwelcome visitors refused to give their names. Although I tried to be strong, this was frightening to me as a woman at home alone. When I would try to call the police, the Scientologists would flee.

6. Anonymous callers phoned our home and threatened us. Scientology operatives openly followed me as I drove to and from work.

7. In 2011, the Scientology operatives leased a five bedroom home less than 200 yards from our residence. This outpost was occupied by at least five Scientology operatives whose full-time job was to make our lives a living hell, as one of them has publicly admitted. They usually wore shirts identifying themselves as Scientologists.

8. We couldn't even peacefully take our evening walk with our little dog, Chiquita. The Scientology operatives used electronic surveillance to alert them whenever we left our home. Within minutes of beginning our walk, the Scientology agents would approach us in a golf cart with up to six cameras trained on us as they hurled insults and rude questions relating to Scientology.

9. If we left home by car, we were inevitably followed by Scientology operatives and tailed to wherever we went. We were then publicly assaulted and harassed wherever we went, including restaurants and the beach. The Scientology agents harassed us in this fashion for 199 days straight. Our neighbors and local government tried to help us, but the harassment continued.

10. From 2010, to the present, the Scientologists have targeted me specifically for harassment. They have worked to drive a wedge between me and my husband, family, and co-workers. Scientology investigators have visited my mother, my father, my former husband, my

friends, and my co-workers. The investigators have falsely claimed to all of these contacts that my life is at risk as long as I remain with my husband. These malicious allegations are hateful and distressing.

11. Presumably because I am a woman, the Defendants seem obsessed with my sexuality. They sent a sex toy to me at my workplace, which was very embarrassing. With their constant surveillance of me, they knew when I was away from the office, at which time they sent flowers to one of my female co-workers with a “romantic” message purporting to be from me. Of course, this was distressing to me.

12. Scientology websites have published bizarre and sometimes vile allegations against me, including false claims that I am a sexual pervert. They have even alleged that I am not even a woman, but a man who has had a secret sex-change operation. So, I have even had my womanhood questioned as part of this sick campaign to inflict maximum emotional distress on me.

13. Near the end of 2012, we discovered that Scientology private investigator, Monty Drake of Granbury Texas, had leased for three years a residence across the street from our home in Ingleside On The Bay. Behind the residence’s blinds, peaking through small cut-outs, was an array of high-powered still and video cameras pointed at, and into, our home.

14. Although we truly loved our home and our neighborhood on the Texas coast, I could no longer take the constant harassment and lack of privacy. Although it cost us the loss of \$35,000 in lease/purchase equity, we moved to find refuge from the Defendants’ harassment. After extensive searching, we found what we believed was an acceptable home with sufficient seclusion in Comal County, Texas.

15. Unfortunately, despite our new home's apparent privacy, some or all of the Defendants continued to watch our comings and goings from a distance, and to follow us when we drove from home. Since July of 2013, the Defendants' activities against us have intensified. They have leased undeveloped property adjacent to our homestead and installed surveillance cameras directed at our property. Defendant Sloat has made contact with us under a false identity and has provided preposterous, false stories to explain the surveillance cameras and why he is moving an RV onto this undeveloped property.

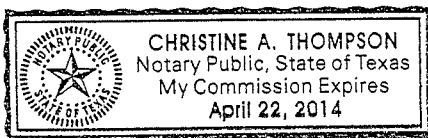
16. I am a private person by nature. The continuous and aggressive invasion of privacy to which I have been subjected, and the related personal and psychological abuse, has, and continues to be, a cause of great distress to me. It has cost me my privacy, my peace of mind, and I believe it is calculated to damage my relationship with my husband, and his relationship with my family and friends so as to injure me. Because I have been subjected to harassment that is habitual, sadistic and categorical, I also live in fear that the Defendants will resume their efforts to discredit me with my co-workers, employer, family and friends."

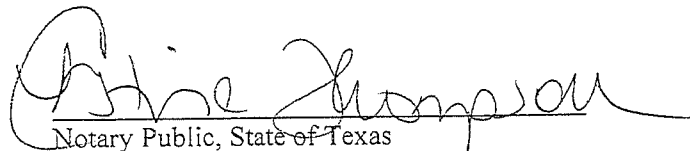
"Further affiant sayeth not."


Monique Rathbun

STATE OF TEXAS §
 §
COUNTY OF COMAL §

SUBSCRIBED AND SWORN TO BEFORE ME, by the said Monique Rathbun, on this the 16 day of August, 2013, to certify which witness my hand and seal of office.




Notary Public, State of Texas

CAUSE NO. C2013-1082B

MONIQUE RATHBUN	§	IN THE DISTRICT COURT
	§	
v.	§	207TH JUDICIAL DISTRICT
	§	
DAVID MISCAVIGE, RELIGIOUS	§	
TECHNOLOGY CENTER, CHURCH	§	
OF SCIENTOLOGY	§	
INTERNATIONAL, STEVEN	§	
GREGORY SLOAT, AND	§	
MONTY DRAKE	§	COMAL COUNTY, TEXAS

AFFIDAVIT OF MARK RATHBUN

“My name is Mark Rathbun. I am also known as Marty Rathbun. I am over the age of eighteen (18) years, of sound mind, and otherwise capable of making this affidavit. I have personal knowledge of the facts and statements contained herein, and all are true and correct.”

1. “I served with Mr. Miscavige in Scientology’s Sea Organization for 27 years. From 1982 to 2004, I answered directly to Mr. Miscavige. As Inspector General of Religious Technology Center (“RTC”), I was Mr. Miscavige’s second in command. Mr. Miscavige and I were the only Scientologists ever awarded Scientology’s “Medal of Honor” by its founder, L. Ron Hubbard. In the history of Scientology, no other Church executive worked with Mr. Miscavige more closely, for a longer period of time, than I did.

2. “The complex network of Scientology organizations is run by a shadow organization known as the Sea Organization, or Sea Org. It is so named because it was formed originally by Scientology founder, L. Ron Hubbard, in 1967 aboard a ship sailing the Mediterranean Sea. The Sea Org is a paramilitary hierarchy. Each Sea Org member holds a naval rank, from Swamper (initiate) to Commodore, the title held by L. Ron Hubbard during his life. Sea Org members vow by contract to serve for a billion years. The Sea Org was organized from the beginning by Hubbard to be amorphous and mobile so as to evade criminal or civil liabilities. The Sea Org was Hubbard’s ultimate answer to his own description of the philosophic bases for Scientology organizations’ legal structure:

‘If anybody tried to attack a Scientology organization and pick it up and move it out of the perimeter or go over the hills with it today – this happened to us once – why, they would find themselves involved in the most confounded weird mass of legal – well, it is just like quicksand. Quicksand. It’s an interesting trick. Every time they shoot at you on the right side of the horse, you’re on the left side of the horse; and then they prove conclusively you’re on the left side of the horse, you prove conclusively that you’re on the right side of the horse. They go mad after a while. This is what the basic legal structure is.’

3. "Since the 1967 formation of the controlling, yet amorphous Sea Org, the corporate structures of Scientology have come and gone, and changed and reformed, many times. The only significant factor that has remained constant through Scientology's many corporate transformations is that the highest ranking Sea Org member is in complete control.

4. "Until Hubbard's death in January of 1986, that controlling leader was Hubbard himself, the Commodore of the Sea Org. Since Hubbard's death, that controlling leader has been David Miscavige. Miscavige has held complete control of all Scientology organizations as the highest ranking Sea Org officer. Since Hubbard's death, Miscavige has been the Sea Org's only Captain, and no one holds a higher rank. Over the years, Miscavige has temporarily bestowed a number of brevet (temporary) Captain ranks to other senior Sea Org members. He has done so, as he explained to me, for the purpose of obscuring his own unquestioned control of all of Scientology as its Sea Org Captain. For several years, I carried the temporary rank of brevet Captain, but Miscavige retained absolute control as the only permanent Captain of the Sea Org.

5. "Until his death, Hubbard controlled all of Scientology. The Scientology organizations shielded him from civil and criminal liabilities by maintaining the fiction that he was merely the "Founder of Scientology." His position was described as an arm's length, passive, semi-retired position uninvolved with the management of Scientology operations. All the while, the thousands of Sea Org personnel answered to him as their all-powerful commander. Directions from Sea Org command took precedence over all of the corporate charters, bylaws, and articles of incorporation of the myriad Scientology corporations staffed by Sea Org management.

6. "In 1981, I was recruited by Mr. Miscavige from my position in the personal office of L. Ron Hubbard to join a critical Sea Org mission. Mr. Hubbard had been driven into seclusion by federal prosecutors and civil litigants who were making a determined effort to pierce the Scientology corporate veil in order to indict and sue Mr. Hubbard as the effective head of all Scientology operations.

7. "Mr. Hubbard's wife, Mary Sue Hubbard, and ten other high-level Sea Org members were convicted in federal court for obstruction of justice. They were members of Scientology's Guardians Office. The Guardians Office had carried out the largest domestic infiltration of the United States Government in American history, and these co-conspirators went to federal prison. Due to the Guardians Office scandal, Hubbard directed Miscavige to accomplish three major aims: (1) re-create an intelligence, PR and legal network to replace the disgraced Guardians Office in a way that would protect Scientology's spying and harassment operations by using buffer corporations and new levels of security; (2) by any means necessary, end the multitude of criminal and civil threats pending against Hubbard and Scientology; and (3) create a new corporate structure that would allow the Sea Org to operate as it always had, but with legal buffers in place that would prevent future 'enemies' from getting to Hubbard or other top Sea Org officers.

8. "We accomplished the creation of a new intelligence, PR and legal machine by establishing the Office of Special Affairs (OSA). Under Hubbard's and Miscavige's close supervision, I organized OSA to effectively continue to silence potential critics and defectors without exposing Hubbard, Miscavige or the Scientology organizations to legal liability. For the

next five years, until Hubbard's death, we worked to extinguish his outstanding criminal and civil liabilities. I was also involved in the corporate re-organization that was intended to buffer Hubbard and Miscavige from liability.

9. "A year after Hubbard's death, Mr. Miscavige informed me that he needed a defensible corporate position to enjoy the protections of the new corporate structure. To accomplish this goal, Miscavige used his Sea Org rank to seize control of all Scientology corporations. Miscavige and I accomplished this by carrying out a coup at the highest, controlling corporation in the Scientology hierarchy, Religious Technology Center (RTC). Miscavige and I, with two other high-ranking Sea Org members, dressed in fully decorated Sea Org naval officer uniforms, forcibly expelled the officers and directors of RTC and coerced them to relinquish their corporate positions to us. If asked, all the Sea Org members involved, would falsely swear that the changes at RTC were done in the normal course of its corporate business pursuant to long-standing policy that testifying against another Scientologist is a high crime.

10. "I became a Director and the President of RTC. For weeks Miscavige struggled with creating a position for himself that would afford the full autocratic control befitting his Captain rank while shielding him from corporate and legal responsibility for the consequences of his tight control. Mr. Miscavige finally settled on the title 'Chairman of the Board, Religious Technology Center.' While never holding a corporate officer's position, Miscavige could legally claim he simply passively passed upon the proposals of the corporate and ecclesiastical officers of RTC in the same manner as in any legitimate corporation. According to RTC's articles and bylaws, its only authorized function is to police the 'proper use of the trademarks of Dianetics and Scientology.'

11. "As the all-powerful head of the Sea Organization, David Miscavige operated in much the same manner as Hubbard. Miscavige created for himself the public appearance of an arm's length title for the outside world to see. Beneath the appearance, he exercised total control over all Scientology organizations through his supreme rank as Captain of the Sea Org.

12. "In fact, from the day our forced corporate takeover began in March of 1987, Miscavige ran the entire Scientology corporate network with no regard for corporate separateness or controls. He managed with an obsessive, micro-managing style. For the next 17 years that I worked as Miscavige's direct aide, he ran the Scientology network as tightly as a naval captain runs a military vessel. All the while we communicated to the world at large, including through our own false declarations, that Miscavige's role was the same as that of any corporate board chairman. We claimed that he operates through the RTC board of directors to oversee the operational management of RTC's corporate and ecclesiastical officers. We also falsely denied that Miscavige was in any way involved in the management of any Scientology corporation.

13. "Meanwhile, Miscavige set up a mechanism to control Church of Scientology International (CSI), Scientology's primary management corporation. Miscavige created an Authorization, Verification and Correction (AVC) department in RTC. Miscavige required that no strategy, program, project, or order of any kind could leave CSI to any Scientology unit anywhere without going through RTC's AVC department. AVC's original mandate was that nothing could issue from CSI unless it was consistent with and designed to implement the

policies of Commodore L. Ron Hubbard. Soon, however, Miscavige changed the rules so that nothing could issue from CSI except orders or programs implementing Miscavige's own commands.

14. "Over the next few years, the entire Scientology corporate and ecclesiastical (Sea Org) organization came to equate 'COB', as Miscavige became known, with "Commodore", as L. Ron Hubbard was known. COB's orders could not be questioned or disobeyed. Through his AVC department's control of every communication emanating from CSI, Miscavige exercised complete control of CSI, Scientology's main operating entity. I witnessed Miscavige's control enforced without question from anyone in RTC, CSI, or any other Scientology corporation for the next 17 years.

15. "By the mid-1990's, Miscavige's every utterance was ruthlessly enforced throughout all Scientology corporations. He regularly strode through Church of Scientology International's California headquarters while barking verbal orders to anyone and everyone, from the janitors to managers responsible for Scientology management across the world.

16. "Miscavige was always accompanied by an entourage of personal staff. A staff member always carried a tape recorder to memorialize every word he spoke. Just before any audio tape would run out, another recorder would be started and held by an assistant inches from his mouth so as not to miss a single word when the first tape was replaced. Runners were on hand to rush every completed audio tape to COB's secretarial unit. There, several typists were employed, 24 hours per day, typing every word from Miscavige's mouth, from the moment he awoke to the moment he laid his head to rest at night. The secretarial unit culled almost every sentence from the transcripts that contained a direction or order Miscavige issued during his daily tours through the offices of Scientology corporations. Those excerpts were issued as written orders to the people Miscavige had directed his comments or orders to during his tours. The orders were so frequent and voluminous that massive rows of high-density files were filled with binders of Miscavige's orders to RTC, CSI, and other Scientology corporations. An elaborate 'time-machine' system was employed to track compliance with Miscavige's orders. The orders were tracked by computers, generating automatic nudges to the recipients to send evidence of compliance. Escalating levels of punishment were devised and enforced for non-compliance over time.

17. "The Office of Special Affairs (OSA) is the legal, public relations, and intelligence network of CSI. One or more network representatives are employed by every Scientology organization across the world. Each of them is operated and managed by OSA International (OSA INT) which is housed within CSI. Although OSA is formally answerable to CSI's management, from OSA's inception in the early 1980's until my departure in December of 2004, the formal management structure was a sham. OSA was carefully micromanaged by David Miscavige. He exercised his control through me, Inspector General of RTC, and Mike Rinder, Commanding Officer of OSA International.

18. "Between 1982 and 2004, it was my job to act as a go-between for Miscavige and OSA. The manner in which we shielded Miscavige was elaborate. Much of Miscavige's control of OSA was done "off the record." Every evening I would receive an intelligence briefing in

writing from OSA. The briefing was usually several pages summarizing reports from private investigators and Scientologists serving as undercover spies watching and interacting with Scientology critics. The written briefing, contrary to established corporate policy, had no routing information on it. That is, the daily briefing had no indication who wrote the report or who it was directed to. If a report ever got out of the Church, it could not, on its face, be used to incriminate any of its authors or recipients.

19. "After I read the report each day, I was instructed by Miscavige to put it into a fresh envelope with no routing information on it. I then personally carried the envelope into Miscavige's office and set it on his desk. I was the only person in Scientology, aside from his wife and secretary, ever authorized such access to his desk. When Mr. Miscavige read the reports, he would enter my office with the report in hand. He would say 'beat it' to my secretary or anyone else who happened to be in my office. Once any visitors had left, Mr. Miscavige would discuss the contents of the report. Often, he would instruct me to order OSA to direct an operative or private investigator to find out something or do something concerning the target of infiltration or investigation. On other occasions, Mr. Miscavige would joke about what was reported about a particular target, or rant about the target's activity. When Miscavige was done discussing the daily OSA briefing with me, he would throw the report onto my desk. That was my cue to pick it up and shred it after he left the office and before anyone was permitted to return to my office.

20. "For 22 years, my schedule was to wake up at least one hour before David Miscavige's scheduled wake up time so that I could collect all important information on any matter of concern to him being handled by the OSA network. Every morning, I was required to brief Miscavige verbally on any major developments on matters handled by the OSA network around the world or matters concerning security. My briefing to him would begin with major problems which he insisted he know about. My briefing included reports about the handling of media stories, investigations, legal cases, security breaches, and potential security situations. That briefing would last anywhere from a few minutes on a quiet day with no major developments, to all day when something was afoot that riveted Miscavige's attention. Miscavige would issue orders to OSA that I had to accurately note on paper.

21. "After the conference with Miscavige, there were a number of options available for issuing his orders, depending on their scope and the level of security required. Most often, I would call Mike Rinder, into my office and I would brief him verbally on Miscavige's directives. Mr. Rinder would then return to his own office and type up the orders as written directives to OSA. Those directives would be worded as if the orders were originated by him, with no reference to me or RTC, and especially not to Mr. Miscavige. On many occasions, Mr. Miscavige would require Mr. Rinder's presence during briefings in which he wanted more detail than usual, or wanted to issue more detailed orders than usual. In such cases, it would be my responsibility to follow up to verify that Mr. Rinder relayed Mr. Miscavige's orders to OSA as Rinder's own orders.

22. "Mr. Rinder and I were ordered by Mr. Miscavige to keep secret virtually all of our communications, and to specifically keep them secret from any other managers or staff with CSI and RTC. All other CSI managers had little to no knowledge of any matters affecting

Scientology from the world outside of the Church. Except for OSA staff, Sea Org members have little contact with the media or the world outside of their corporate duties.

23. “The highest priority OSA matters that I had to monitor and report on several times a day to Mr. Miscavige were ones that involved his name. If a staff member left unannounced from the Scientology corporate headquarters, and the person had any personal knowledge of Mr. Miscavige by way of regular contact with him, I was required to personally direct a massive dragnet utilizing Sea Org staff from RTC and CSI, and private investigators, to hunt down that staff member. This occurred on average a couple of times per year. I was micromanaged on such manhunts by Mr. Miscavige personally. I would make sure the person was contacted, and put under control and sometimes order ongoing surveillance through OSA that could last up to several years.

24. “If a journalist mentioned anything about interest in Mr. Miscavige, I directed and monitored every conversation between a church representative and that journalist. I prepared the staff member in advance and debriefed him afterward, all of which I reported directly to Miscavige.

25. “If a lawsuit named or sought discovery that involved Miscavige, I oversaw every aspect of that litigation until Miscavige was no longer subject to inquiry. During my tenure of more than 20 years, Miscavige micromanaged every single action that was taken by any OSA staff member, intelligence officer, private investigator or attorney related to that matter. No OSA operation, whether or not it involved outside professionals, could be undertaken on any matter potentially involving the name ‘David Miscavige’, without Miscavige’s fully-informed and direct authorization and direction. That rule included even the potential defection of a staff member with only tangential information about Mr. Miscavige. OSA was founded on this policy, and I instituted it and carried it out painstakingly for 22 years, from 1982 to 2004, when I departed RTC.

26. “For more than 20 years, the Office of Special Affairs (“OSA”) of the Church of Scientology International answered to me. Under the close supervision of Mr. Miscavige, I directed OSA’s extensive, ongoing security, intelligence, “black ops”, public relations, and criminal and civil legal matters. Mr. Miscavige obsessively micromanaged OSA’s handling of perceived threats, including the threat of former Scientologists who complained of abuses occurring in the Church.

27. “I have read the Declaration of David Miscavige in Support of Special Appearance in this case. Mr. Miscavige’s Declaration is false, for the factual reasons stated above and below:

A. Miscavige’s false statement: **“Prior to learning of this lawsuit, I had never heard of nor did I have any knowledge of Defendants Mr. Sloat and Mr. Drake.”**

28. “Mr. Miscavige has known of the Church’s employment of Monty Drake since the 1990’s. Mr. Drake became Scientology’s primary private investigator for Texas matters in the early 1990’s. In 1996, Miscavige asked me whether we had any private detectives in the State of Texas. I told him that we retained Monty Drake, a private investigator in the Dallas area, who we used to investigate a former RTC executive living in Dallas. Miscavige expressed amusement

at Mr. Drake's name, and questioned me whether "Monty Drake" was a real name or an undercover name. I informed him that Monty Drake was a real name.

29. "David Miscavige ordered me on several occasions between 1996 and 2004, to have Mr. Drake obtain both specific and general information on the family of Lisa McPherson. Lisa McPherson was a young Scientologist who died while in the care of the Church of Scientology. I relayed Mr. Miscavige's orders to Ben Shaw of Church of Scientology Flag Service Organization and Linda Hamel of OSA. Both Ms. Hamel and Mr. Shaw sent me several reports of Mr. Drake's investigations. I personally handed each of Mr. Drake's reports to Mr. Miscavige, during the criminal and civil litigation concerning Ms. McPherson and her family.

30. "In the 1990's, I also personally delivered to Mr. Miscavige a number of Mr. Drake's reports concerning the Church's multiyear investigation of Alan Walters, a former Scientologists in Texas. Mr. Miscavige read these reports of the Texas investigation and used the information to direct OSA's activities in Texas against Mr. Walters

B. Miscavige's false statements: **"I have never availed myself of the privilege of conducting activities within the State of Texas." & "I have not made any purposeful contacts with the State of Texas seeking any benefit, advantage, or profit." & "I have not otherwise availed myself of the benefits and protection of Texas law."**

31. "In addition to the facts stated above, the following facts demonstrate the falsity of Mr. Miscavige's Declaration. Mr. Miscavige was intensely involved with the handling of the fallout from the death of Lisa McPherson in Florida. He devised a strategy to bring legal action in Texas, rather than Florida, against the executor of Ms. McPherson's estate. Mr. Miscavige said that he did not want to litigate in the most obvious venue, Pinellas County, Florida, because he believed it would be hostile to Scientology. He ordered me to execute his Texas litigation plan.

32. "As I carried out Mr. Miscavige's Texas strategy, he repeatedly stressed to me that no Texas suit could be filed unless I found Texas legal counsel so connected to the local judiciary as to assure victory to the Church.

33. "During the several weeks that I implemented Mr. Miscavige's orders in Texas, I reported to him daily. After researching the issue of which Texas attorneys to retain, I recommended the Dallas law firm of Jenkins & Gilchrist. Mr. Miscavige ordered me to bring the attorneys to the Church's facilities in the Tampa, Florida area for a two-day tour, briefing, and indoctrination.

34. "Mr. Miscavige ordered me to gain the Texas attorneys' confidence so they would reveal to me the extent of their connections in the U.S. District Court in the Tyler Division of the Eastern District of Texas. After my discussions with them, the attorneys agreed to return to Texas and thoroughly investigate to find the Tyler attorney with the strongest ties to the three federal judges in U.S. District Court there.

35. "I reported to Mr. Miscavige the details of my conversations with the Jenkins & Gilchrist attorneys. Mr. Miscavige expressed mistrust of the attorneys' representations. He ordered me to tell them that their continued retainer was conditioned on finding local counsel with such

connections that he could walk unannounced into the chambers of any of the three federal judges to chat.

36. “The Jenkins and Gilchrist lawyers reported to me that they had found the most connected lawyer in the Tyler Federal Courts and they provided me with many relevant details about the attorney’s connections. I reported these favorable details to Mr. Miscavige. He expressed disgust, however, with my failure to find a Texas lawyer whose connections would guarantee victory to the Church.

37. “Mr. Miscavige threw a tantrum and called me a “f---ing loser”. He lectured me that he was the only Scientologist with the dedication to stick his neck out and guarantee victory. He said he would have to be the one to personally handle this flap, as he had handled every other major problem of CSI’s Office of Special Affairs. After more ranting and raving at me, he ordered me to hire the local counsel selected by Jenkins & Gilchrist, with the warning that “if they don’t win, you are dead!”

38. “In December of 1995, David Miscavige ordered me to send Scientologist, Bennetta Slaughter, a former Texan living in Florida, to the funeral of Lisa McPherson in Dallas, Texas. His orders were for Ms. Slaughter to “handle” Lisa McPherson’s grieving mother and convince her not to investigate the circumstances of her daughter’s death. Miscavige instructed that if Ms. Slaughter had to resort to paying the mother to forget the loss of her daughter, we were willing to ‘lose a couple hundred grand for this to go away.’ Ms. Slaughter carried out the mission to Dallas, while reporting to me. Ms. Slaughter reported that, in spite of her family connections, her efforts to cozy up to Mrs. McPherson were rebuffed and she never established enough communication to suggest paying her. I reported all the details to Mr. Miscavige. Mr. Miscavige cursed harshly about Ms. Slaughter and then issued a number of orders about covering up the circumstances of Lisa McPherson’s death.

39. “In early 1996, Mr. Miscavige ordered me to send an OSA staff member, Brian Anderson, to approach Mrs. McPherson in Texas to accomplish the same purpose as the Slaughter mission. Mr. Miscavige briefed me in detail on how Mr. Anderson was to act so that he could gain Mrs. McPherson’s trust without betraying any details of her daughter’s death. I carried out Mr. Miscavige’s orders and sent Mr. Anderson to Dallas, Texas. In Dallas, Mr. Anderson asked to meet with Mrs. McPherson, but she rebuffed him. I reported all the details to Mr. Miscavige. In response, Mr. Miscavige cursed about the incompetence of Mr. Anderson and me.

40. “It is important to understand that Mr. Miscavige’s consistent custom and practice for more than 20 years was to closely monitor and micromanage every OSA operation dealing with Scientologists who dared to leave the Church. His involvement intensified if the person had been at a high level in the Church hierarchy and had personal knowledge of Mr. Miscavige’s activities. As noted above, I was the highest level officer in the Church after Mr. Miscavige, and I worked directly with him for 27 years.

41. "No Scientologist or groups of Scientologists, including OSA, have authority to undertake any intelligence operation or destructive campaign against a high-ranking defector without specific approval from David Miscavige. Furthermore, if he orders any such activities to proceed or to cease, his orders are carried out to the letter without question. He has total and absolute authority in all branches and all functions of the Scientology corporations."

"Further affiant sayeth not."



Mark Rathbun

STATE OF TEXAS §
 §
COUNTY OF COMAL §

4th SUBSCRIBED AND SWORN TO BEFORE ME, by the said Mark Rathbun, on this the day of September, 2013, to certify which witness my hand and seal of office.




Notary Public, State of Texas