

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

LA VENDA VAN SCHAICK, et al

CIVIL ACTION v.

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA, et al,  
Defendants  
NO.79-2491

AFFIDAVIT OF RONALD DeWOLF a/k/a L.RON HUBBARD, JR.

I, Ronald DeWolf, formerly L. Ron Hubbard, Jr., hereby do and state as follows under the penalties of perjury:

1) I have personal knowledge of the facts set forth in this affidavit.

2) I am the oldest son of L. Ron Hubbard, having been born on May 7, 1934 in Encinatas, California.

3) Between 1949 and 1959 my father and I worked together on a regular basis in organizing, developing and promoting many organizations and corporations. which collectively became known as the Church of Scientology.

4) My father promoted the Church of Scientology with the sale of his books and publications based on his Various theories relating to the "science of mind" as the most "exact science" ever developed. He represented in writing in most of the Church publications that he possessed degrees from George Washington University, Princeton University, that he was a nuclear physicist, that he served four years in combat, was seriously wounded and healed his war wounds with his theories on the "science of the mind", which is the foundation of Scientology. Throughout the development years of Scientology and to the present date, the Church of Scientology has made the foregoing representations and most individuals who have joined the organization that I personally know, relied specifically on my father's represented qualifications and credentials. The stated representations are all false. He never obtained degrees from those universities, or ever served in combat. He was relieved of duty three times as being unfit, and ended up in a psychiatric hospital at the end of the war. He is a fraud and has always been a fraud.

5) My father's fraudulent conduct is exemplified in the structure of his corporations including the Church of Scientology of California. In connection with each and every corporation which we created under general heading of 'the Church of Scientology', my father always required all of the Directors and Officers of all corporations to give him undated signed resignations in advance which he held. In that manner, he always has retained complete control over every corporation including its bank accounts. In the early years, my father regularly emptied out these corporation bank accounts whenever the A.M.A., or a local district attorney, etc. posed a threat to one of his organizations.

A copy of express instructions on this point in my father's handwriting is enclosed.

6) My father represented orally and in writing that his theories relating to the "science of the mind" were based on 30 years of case studies conducted on a scientific basis by him as a nuclear physicist and scientist. Most people that I knew who paid money to my father's corporation to learn about this science also relied on the above stated representations in addition to my father's credentials. Similarly, the above stated representations are false. My father wrote his books off the top of his head based on his imagination. There were no case studies. He is not a nuclear physicist and flunked nearly all of his science related courses in high school and college.

7) My father obtained the rights to the E-meter in 1952 from Volney Mathison in the same manner that he does everything - through fraud and coercion. My father learned about the E-meter from Mathison who developed it and my father fraudulently extracted those rights from Mathison so that my father could use it in Scientology auditing.

8) My father has always used the confidential information extracted from people during auditing sessions to intimidate, threaten and coerce them to do what he wanted, which often meant getting them to give him money. My father routinely used false threats and auditing information particularly about crimes people had committed to extort money from them.

9) My father has always held out Scientology and auditing to be based purely on science and not-on religious "belief or faith. We regularly promised and distributed publications with "scientific guarantees". This was and has always been common practice. My father and I created a "religious front" only for tax purposes and legal protection 'from fraud Claims'. We almost always told nearly everyone that Scientology was really science, not a religion, but that the religious front was created to deal--with the government.

10) My father's basic policies relating to "suppressive persons", "Fair Game", "attack the attacker", etc. have .always been and will always be an integral part of Scientology. The organizational structure of Scientology and the theories of Scientology cannot operate and Scientology would not be Scientology without such policies. The entire basis of my father's "science" is the suppressive person this theory, just as Nazism would not be Nazism without the theories of Aryan supremacy and anti-Semitism My father and I discussed the basic theories of dealing with suppressive persons, such as what eventually became designated as the "Fair Game Doctrine", on many occasions. These policies have never changed.

Signed under the pains and penalties of perjury

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RONALD DeWOLF

end of\*\* AFFIDAVIT \*\*