

Report: Expert Report by
Dr Stephen Kent

Re: World Institute of Scientology Enterprise
and it's involvement in the unfair termination
of the plaintiffs employment.

Relevance: All businesses affiliated with
W.I.S.E.

all continents, all territories
& jurisdictions.

W.I.S.E. is part of the Scientology organisation
and forms an integral if extended part of their
cult recruitment program.

W.I.S.E. is an international concern and operates
in the same manner at all locations.

Expert report prepared for the plaintiff in the case of EEOC v. I-20 Animal Medical Center

[Original Article Online - Here](#)

The I-20 Animal Medical Center (Mauri Karger, WISE 1997 and 1999 list, \$40,000 donation to the IAS) had pressured its employees to attend scientology courses. Six of them sued with the help of the Equal Employment Opportunity Commission and got a \$150,000 settlement, and the defendants had to agree not to use any "religiously-influenced" training material. The following is an expert report submitted by Prof. Stephen Kent in the case. HTML, table of contents, links and this paragraph added by [Tilman Hausherr](#).

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I. INTRODUCTION

My expert report will provide an overview of Scientology; the Scientology-sponsored corporation, World Institute of Scientology Enterprises (WISE) and its related organization, the Hubbard College of Administration; and the courses that management of I-20 Animal Medical Center (I-20 AMC) initiated ostensibly as staff training. Especially when discussing the courses that I-20 AMC imposed upon its staff, I will identify religious elements in what is supposed to be secular learning material. I base my analysis upon sworn statements and depositions by some of the aggrieved former employees, copies of internal documents and publications from both Scientology and WISE, and documents that I-20 AMC produced in this case.

II. OVERVIEW OF SCIENTOLOGY

A. Brief History and Doctrines--Known for his pulp fiction and science fiction writing prior to and after World War II, L. Ron Hubbard (1911-1986) introduced Scientology's forerunner, Dianetics, to the world in 1950. Dianetics claimed that people have what Hubbard called a "reactive mind" and an "analytical mind." The reactive mind has imprinted in it painful incidents along with incidents involving unconsciousness, either of which could have taken place at any point in one's life (including in pre-natal states). These imprinted incidents are called "engrams," and various stimuli could trigger them in ways that lead to irrational or harmful behavior. In contrast, the analytical mind is not subject to such negative influences, and the goal of Dianetics is to free the analytic mind by ridding the reactive mind of its engram, thereby reaching the state known as "clear." This act of ridding the reactive mind comes about through a process called "auditing," which in the earliest days of Dianetics involved exercises in which an auditor directed a subject (called a "pre-clear") back into his or her life-events to discover and dispel engrams. The dispersal of engrams, Hubbard claimed, could lead to a wide range of cures for what he described as psychosomatic illnesses, including (among others) arthritis, asthma, eye trouble, bursitis, and ulcers (see *Church of Scientology of Minnesota v. Department of Health, Education and Welfare*, 1971: 564-565). Even as Dianetics practitioners allegedly began running incidents from past lives by the end of 1950, Hubbard remained steadfast that his new system was a science.

Allegedly running current-life and past-life incidents was enhanced in March 1952, with Hubbard's introduction of a device known as the E-Meter. This device measures changes in the electrical conductivity of the skin as a small current runs between two metal cans that the pre-clear holds (one in each hand). Scientologists believe that the device gives accurate indications of emotional changes, and they continue to use these devices as an auditing tool (and often as a reputed lie detector [see [Atack, 1990](#): Hubbard, 1960; 1961; [Miller, 1987](#): 201]).

Hubbard began what he named, "Scientology," in the Spring of 1952, as an extension and expansion of Dianetics ([Miller, 1987](#): 199-202). In December 1953, Hubbard initiated his assertion that Scientology was a religion ([Miller, 1987](#): 220). In Scientology he did develop teachings about past lives (including ones in different galaxies) more than he had in his initial Dianetics system. The entity that Scientologists believe continues through countless lives is called a thetan, which is roughly analogous to a soul or spirit that has forgotten its true nature.

B. Policies and Procedures--Currently Scientology offers numerous courses to its members at a variety of locations. Members can take lower level courses at local Scientology organizations (called "missions"), while they must go to larger Scientology facilities to take more "advanced" material. Together these courses and related training programs constitute what Scientology calls "The Bridge to Total Freedom" or simply, "The Bridge" (see Church of Scientology International, 1993: 97). Regardless of the size of the facility that offers these courses and related training, it is organized according to (what Scientology calls) an "organizing board" (or simply, an "org board"). Moreover, businesses (such as I-20 AMC) that utilize Scientology principles, concepts, and doctrines also use the same org board, with only slight variations to it in order to accommodate the nature of the products or services being offered (see Standard Organizing Solutions, 1996).

All Scientology org boards consist of what the organization calls seven "divisions," and they receive separate designations because each one is supposed to perform the functions or services necessary to produce a product that is specific to it (see Church of Scientology International, 1994: 604). Division 1 is Communication, which involves establishing the flow of information within an organization (such as the production of memos, hiring and integrating new personnel, and data collection about the organization's operations). (In the I-20 AMC, Division 1 goes by the name, "Establishment," and it aspires to produce "established, productive staff members"). Division 2 is Dissemination, and it involves informing people about the product that the organization is producing (Church of Scientology International, 1994: 605). (Appropriately, I-20 AMC's Division 2 is called "Marketing and Sales," and specifically is dedicated to "clients consuming I-20 AMC products and services." Division 3 is Treasury, which handles the acquisition, dispersal, and bookkeeping of finances and resources. (The parallel division in I-20 AMC is called "Finance"). Division 4 is Production, which involves the actual production of a product. (Because I-20 AMC is a veterinary clinic, its Division 4 is called, "Medical," since its products are medical services and animal care.) Division 5 is Qualifications, and it evaluates the quality of the finished product. (I-20 AMC's parallel division goes by the more intelligible name, "Quality Control.") Division 6 is the Public Division (simply called "Public" in I-20 AMC), which informs the public about the (reputedly) high-quality product that the organization is producing. Division 7 is the Executive Branch (simply called "Executive" in I-20 AMC), and "it coordinates the activities of the rest of the organization and sees that it properly functions to accomplish its purpose" (Church of Scientology International, 1994: 605).

Each of these divisions is further subdivided into departments (totaling 21) whose staff has specific assignments. In Scientology's language, these specific assignments are called "hats." Scientology has study programs (called "hat packs") for each of these positions, and I-20 AMC followed Scientology's lead by developing hat packs for its staff positions that its employees had to complete.

In a standard Scientology org board, a Communications Executive Secretary oversees the operation of Divisions 7, 1, and 2, while an Organization Executive Secretary oversees Divisions 3 through 6. Finally, an executive director oversees the two executive secretaries (see Church of Scientology International, 1994: 604-609). According to a partial sketch of I-20 AMC's org board that current I-20 AMC employee, Diane Grimm, drew in her deposition, I-20 AMC has an Establishment position overseeing divisions 1, 2, and 7; an Organization position overseeing divisions 3, 4, and 5, and a Public position overseeing Division 6. It also has a position called Deputy Executive Director. I-20 AMC's owner, Dr. Marjorie Karger, is at the top of veterinary clinic's org board, serving as its Executive Director. As we shall see later, these five management-level positions at I-20 AMC play a significant role in the EEOC's assertion about religion having played an inappropriate role at the veterinary center.

III. WORLD INSTITUTE OF SCIENTOLOGY ENTERPRISES (WISE)

A. Purpose--WISE plays an important role in this case, since many of the courses that I-20 AMC staff had to take if they aspired to management positions came from WISE and the organization that it established--the Hubbard College of Administration (Church of Scientology International, 1993: 354; see Grimm [Deposition], 1999: 148; Karger [Deposition], 1999: 35-36, 39-40, 54). Scientology's own material about WISE identifies the organization's religious dimension, and that dimension becomes even clearer when examining material sent to WISE members. What also becomes clear from some material sent to WISE members is that WISE is a recruitment vehicle into the Church of Scientology itself.

The "Articles of Incorporation of [the] World Institute of Scientology Enterprises" is definite about the organization's religious nature. "It is organized under the Nonprofit Religious Corporation Law primarily for religious purposes. Its purposes are to promote and foster the religious teachings of L. Ron Hubbard in society..." (Articles of Incorporation, 1983: 1). First filed with the Office of the Secretary of State of California on February 1, 1983, WISE's Articles of Incorporation were still in effect on November 1, 1999 (See the first certified document attached to Articles of Incorporation, 1983). A 1993 book published by the Church of Scientology International gives a somewhat earlier date for the beginning of WISE, but it, too, identifies its religious nature:

...the World Institute of Scientology Enterprises (WISE) was born in 1979. A religious fellowship organization, WISE is made up of businessmen [sic] and professionals in numerous fields, who share a common certainty that only through the application of Mr. Hubbard's administrative technology can one do for the third (group) dynamic what Scientology does for the individual: eliminate confusions, replace hardship with happiness, and generally better survival.

Their tools are the extensive writings on the subject of administrative technology which resulted from Mr. Hubbard's codification of the Scientology religion (Church of Scientology International, 1993: 351).

(The "dynamics" to which this quote refers are levels or dimensions of existence, beginning with "self" and ending with the eighth dynamic concerning the Supreme Being [Hubbard, 1976: 166]).

The Hubbard College of Administration is a WISE creation, and its name appears on the course packs that I-20 AMC provided to the EEOC. As a Church of Scientology International book states, "[b]ecause so many businesses and industries now use Mr. Hubbard's technology, WISE has established the Hubbard College of Administration to expand the business professional's ability to tackle the challenges of administering and running a group, company, or organization" (Church of Scientology International, 1993: 354).

B. WISE as a Recruitment Vehicle for the Church of Scientology--Neither WISE's articles of incorporation nor its description by the Church of Scientology International separate the religious nature of the organization from a secular mission to promote Hubbard's business management policies and procedures. A magazine published for WISE members outlined how business consulting provided various opportunities to get "businessmen [sic] on The Bridge [to Total Freedom]." The accompanying illustration showed a curved, ascending bridge on which were four specific categories, each with an arrow next to them (implying that they were ways of getting on "The Bridge").

In ascending order, the specific categories were: business seminars and lectures; business and OCA [Oxford Capacity Analysis] Evaluation, Admin Training and Consulting, and Wins with LRH Admin Tech in Business (WISE International, 1992b: 13). In the context of this expert evaluation, the presence of the Oxford Capacity Analysis as a Scientology recruitment tool is especially noteworthy, since two former I-20 AMC employees mention it (Allen [Affidavit], [n.d.]: 1; see Brady [Statement], 1997: 1), and I-20's owner and Executive Director, Dr. Karger, indicated that her veterinary center used it in the hiring process (Karger [Deposition], 1999: 154-155 [incorrectly called the Oxford Capacitor test]).

On the page following this illustration was a cartoon that, in eight boxes, explained the process of "Getting Clients up The Bridge." The advertisement begins with a paragraph that explains:

During consulting, clients are often surprised to find that the Administrative Technology of L. Ron Hubbard has improved conditions in their personal lives, as well as in the operation of their businesses. If a client is interested in finding out about *Dianetics* Spiritual Healing Technology and *Scientology* Applied Religious Philosophy for self-enhancement, his [sic] consultant will assist him by referring him to his local class V Org or Mission (Wise International, 1992c: 14).

Short explanations accompany each of the eight cartoons:

1. Businessman [sic] attends a seminar or lecture[.]
2. Signs up for consulting and training[.]
3. Along with analyzing the client's business, the consultant reviews the Eight Dynamics and explains how Dianetics and Scientology can do for the client's life what the Admin Tech can do for his business[.]
4. If client reaches to handle his first dynamic [i.e., himself], he is put in touch with the reg [i.e., registrar] of his local Class V Org or Mission[.] [A Class V Org is authorized to offer a particular level of Scientology courses.]
5. Client studies LRH Admin Tech[.]
6. Client applies tech to his business and has wins[.]
7. Client reaches, if he has not done so before, to get LRH tech applied to himself[.]
8. Client has his OCA [the Oxford Capacity Analysis] evaluated at his local Class V Org or Mission (WISE International, 1992c: 14).

The fact that this recruitment strategy appeared in a WISE publication gives credence to the claims of the aggrieved parties in this lawsuit that they felt the courses were attempts to recruit them into the Church of Scientology.

The page following this one in the WISE International publication contained a testimonial from a veterinarian who went through the process that the cartoons outlined. "While doing courses at [a business management organization called] *Sterling*," [George Malnati, D.V.M.](#) said, "I became interested in learning more about *Dianetics* and *Scientology*. I got onto the Bridge when I had my OCA evaluated while doing courses at *Sterling*. A month later I was on my Life Repair and for the past three years I have been able to take at least three months off from my practice to go up *The Bridge* (WISE International, 1992d: 15; See WISE International, 1992a). This quote is particularly relevant for this case, since Dr. Karger herself had never heard of Scientology or its founder until she took *Sterling* Management courses in 1987 (Karger [Deposition], 1999: 132-133, 170-171). (*Sterling* Management Systems is a WISE licensee that markets WISE's course work, targeting small medical, dental, veterinary, and chiropractic offices.) In essence, *Sterling* Management became her point of entry into the Scientology world, as it has for so many other professionals ([Hall, 1998](#)).

C. Scientology's 'Ethics' System--Supplementing the efforts of Scientology organizations like WISE that attempt to draw in recruits by disseminating Hubbard's teachings, Scientology's "justice" and "ethics" systems attempt to punish persons and organizations that hinder its expansionist and recruitment efforts. One needs an in-depth familiarity with Scientology to be able to decipher many of the definitions that the organization provides for justice and ethics, but the basic points about them are clear. For example, the first definition of "justice" in Scientology's business management dictionary states that it is "the action of the group against the individual when he has failed to get his own ethics in" (Hubbard, 1976: 295). That cryptic definition presupposes that one knows what "ethics" means to a Scientologist, and again it is essential to go to the standard Scientology management dictionary.

What becomes apparent is that Scientology's notion of ethics is completely self-serving for the organization. Amidst several definitions are the statements:

All **ethics** is for in actual fact is simply that additional tool necessary to make it possible to get technology in. When you've got technical in, that's as far as you carry an **ethics** action.... 4. the purpose of **ethics** is to remove counter intentions [i.e., opposition] from the environment. And having accomplished that the purpose becomes to remove other intentionedness [sic; competition] from the environment (Hubbard, 1976: 179).

Translating these Scientology statements into plain language, the justice and ethics system that Scientology uses, and that I-20 AMC staff had in place through ethics officer and Scientologist, Vicki Densmore, is committed to removing both opposition against and competition to Scientology's so-called "technology." At the same time it also intended to punish anyone who hinders Scientology's efforts in these matters. Scientology leaders apparently assume that, once an organization is using Hubbard's business technology and all opposition to its use has been squelched and all competitors eliminated, then it is an easy step to convert people to the religion itself. Consequently, staff suspicions that they suffered retaliation (which led to several of them quitting) after they resisted taking courses are entirely consistent with the application of Scientology's ethics against resistance.

IV. I-20 AMC's STAFF AND THE INTRUSION OF RELIGIOUS CONCEPTS INTO THE WORKPLACE

The aggrieved parties insist that the work environment was infused with Scientology, and a careful analysis of available documents indicates that Scientology doctrines, terminology, policies, and procedures were in place. For example, a discussion exists of the Scientology religious term, "exteriorization," in a Hubbard College of Administration course, "Improving Business Through Communication" [Bates Stamp Number D-01145]. I shall return to this term later.) Other Scientology terms include (among many others): analytical mind; the arc triangle; beingness; determinism; dev-t; down scale; havingness; livingness; misemotion; potential trouble source (PTS); reactive mind; suppressive persons (SPs); third party law; and Tone Scale. These and other unique Scientology terms permeated the courses that I-20 provided for its staff.

Doctrines, policies, and procedures involving "religious Scientology" also found their way into the I-20 AMC work environment, specifically through the actions of most of the managers and through the courses that they either recommended or required. The introduction of the religious dimensions of Scientology into Dr. Karger's veterinary center was a direct result of her hiring policies and the staff training procedures that she allowed and, for a time, encouraged.

A. I-20 AMC Managers Who Were Scientologists--In order to understand how Scientology's religious dimensions entered the I-20 AMC workplace, it is helpful to review the role that Scientology in general played for all of the upper managerial personnel. Scientology's role began in 1987, when an overworked Dr. Karger (who was probably putting in close to ninety hour weeks [Karger (Deposition), 1999: 14]) took a practice management course at Sterling Management Systems in Glendale, California (Karger [Deposition], 1999: 18-19; 29-31). While there she first learned of L. Ron Hubbard and Scientology (Karger [Deposition], 1999: 132-133; 170-171). Upon returning from the course she considered implementing a key procedure that Sterling Management (and other WISE licensees) advocate, which is "management by statistics" (i.e., keeping records and charting a number of measures as indicators of growth or decline). She was, however, too busy to do so (Karger [Deposition], 1999: 22), and she did not implement this procedure until the mid-1990s. She retained her interest in Scientology, and around 1988 she received auditing at a Church of Scientology in Orange County, California. In 1990, she read Hubbard's initial, pre-Scientology book, Dianetics: The Modern Science of Mental Health (Karger [Deposition], 1999: 170-172).

Some time in the early 1990s, a Scientology consultant who worked with I-20 AMC (named Mark Warrick) had the veterinary center pay for two employees, Laurie Hamilton and Todd Steele, to attend a business or practice management course in Los Angeles. It is not clear whether they attended the Hubbard College of Administration (Karger [Deposition], 1999: 209-210) or Sterling Management Systems (Steele [Affidavit], 1997: 1). Laurie Hamilton may already have been a Scientologist by the time of the trip (Steele [Affidavit], 1997: 2), but Steele was not, and when talk of Scientology began during the second day or so of the course, Steele refused to continue with it. Someone at the seminar put Steele on an E-Meter, and--using the device as a lie detector--apparently tried to find out why Steele was opposed to the seminar (see Steele [Affidavit], 1997: 1).

Steele's bad experience around the California seminar may have been what he was speaking about (in a derogatory manner) to a person whom he had hired--Vicki Densmore--some time in the early 1990s (Densmore [Deposition], 1999: 60-61, 16). Rather than putting her off the organization, however, Steele's comments heightened her curiosity about it, so she went to the local Scientology mission--the Casa Linda Mission--to acquire information herself. While there she spoke to the Mission's Executive Director, Malcolm Taylor, and Renee Taylor (who presumably by that time was his wife). Soon Densmore took a Dianetics seminar at the mission, along with a program that ostensibly purges the body of drug and radiation residues (the Purification Rundown) and a "Training Routines and Objectives" course (Densmore [Deposition], 1999: 61-62). It is very likely that Renee Taylor supervised her course, since she was a Scientology auditor and course supervisor (see Grimm [Deposition], 1999: 132; Karger [Deposition], 1999: 106). Within a few years, Renee Taylor will pay a major role in I-20 AMC. Meanwhile, some time around 1992 or 1993, Densmore became a Scientologist (Densmore [Deposition], 1999: 58).

Although Dr. Karger never visited the Casa Linda Mission, she did visit the Celebrity Center Dallas (Karger [Deposition], 1999: 38). Possibly there she met Malcolm Taylor, and then through him met his wife, Renee (see Karger [Deposition], 1999: 99-100). She did meet a staff member at the Celebrity Center named Forrest Chamberlain who at some future date would deliver a seminar that Vicki Densmore would attend and I-20 AMC would pay for (Karger [Deposition], 1999: 37-38; 43-44).

Another I-20 AMC employee who is important for the EEOC case is Diane Grimm, who began at the veterinary center in July 1990 with seven years' experience as a veterinary technician in California (Grimm [Deposition], 1999: 9-11). In May, 1991, Grimm had a subscription to [Time magazine](#), and she thought that its [cover story on Scientology](#) was slanderous. Knowing that Dr. Karger was a Scientologist, Grimm let her know how she felt about the piece but Dr. Karger would not talk about it at work (Grimm [Deposition], 1999: 118-119). It is impossible to determine from existing sources when and how Grimm became involved with Scientology itself, but around 1997 (and on her own time) she took classes at Scientology's Celebrity Center Dallas (Grimm [Deposition], 1999: 114-115). She mentioned these classes (or courses) to Dr. Karger and Renee Taylor (who had become an I-20 employee [Grimm (Deposition), 1999: 116]).

By 1995, I-20 AMC had established an Executive Council that did long-term planning, organized parts of the medical center's operations that were deficient, approved purchase orders, and recommended promotions (Grimm [Deposition], 1999: 87-90). In both 1995 and 1996, the Executive Council's members consisted of Dr. Karger (as Executive Director), Laurie Hamilton, Vicki Densmore (as the Establishment Officer and Ethics Officer [Densmore (Deposition), 1999: 22-23]), and Diane Grimm (as Organizational Executive Secretary [see Grimm (Deposition), 1999: 89-90]). Important to note is that three of these managers--Karger, Hamilton, and Densmore--were Scientologists, and the fourth person--Grimm--became one within about two years. In 1997, Laurie Hamilton was gone, but a new person, Robin Rhyne, filled her place on the Executive Council. All of these people holding I-20's upper management positions were Scientologists (see Sisk [Deposition], 1999: 29), and Rhyne had come to I-20 AMC as the replacement that Renee Taylor picked to succeed her when she moved away. He apparently had no experience in a veterinary clinic, but instead had been a Scientology auditor at Celebrity Center Dallas. He even had audited Diane Grimm at the Celebrity Center Dallas at some point (Densmore [Deposition], 1999: 56-57; Grimm [Deposition], 1999:129-130). Because Dr. Karger was hiring him to supervise courses, his experience as a trained Scientology supervisor was sufficient for her to ratify his selection by Renee Taylor and to quickly place him on the Executive Council (see Karger [Deposition], 1999: 125-127). Also worth highlighting is that Vicki Densmore was the ethics officer, which meant that she warned people who violated policy (Densmore [Deposition], 1999: 23-24). In the work environment of I-20 AMC, Densmore's role as the ethics officer gave her significant and substantial power to extract conformity about the Scientology-based policies.

By the mid-1990s, both Dr. Karger and Vicki Densmore knew Renee Taylor, who was the course supervisor at Scientology's Casa Linda Mission. In late 1994 or early 1995, Dr. Karger created a part-time management consult position just for her, and assigned her the primary responsibility of conducting training and setting up a course room. She also was instrumental in ordering and setting up the facility's org board. In sum, Dr. Karger wanted Taylor "[t]o help implement business management technology so that we could become more organized" (Karger [Deposition], 1999: 102).

B. Recommended and Required Courses That Contained the Scientology Religion--Renee Taylor established a significant list of courses purportedly for staff training. She divided this list into "Mission Courses," which were courses that (presumably) she had supervised at the Scientology's Casa Linda Mission, and "WISE Courses," only some of which she was able to deliver. (Possibly a consultant who was licensed by WISE, like Forrest Chamberlain, could supervise ones that Ms. Taylor herself could not.) The Casa Linda Mission courses totaled eleven in number; the WISE courses totaled nineteen (see one of two documents with Bates Stamp Number 01623). For a period of time Ms. Taylor offered some of the courses for I-20 AMC staff at the Casa Linda Mission itself, and aggrieved party Stephanie Brady took one course, "The Basic Study Manual," there. She took this course upon Dr. Karger's recommendation (in an effort to "get better grades"), and fellow staff member and Scientologist Vicki Densmore drove her to the mission (Brady [Statement], 1997: 1). (Eventually aggrieved party Brady was able to count this course as one among six "Mission Courses" that contributed to her qualification of being fully trained ("fully hatted") on all of I-20 AMC's staff positions (Bates Stamp Number D-05206). Dr. Karger canceled the opportunity for staff to take the courses on Saturdays at Casa Linda Mission (Bates Stamp Number 01620). Courses continued, however, on Thursday afternoons in an office above her husband's dental office in Forth Worth. During another period, I-20 AMC rented space from a local church in order to offer the courses (see Karger [Deposition], 1999: 84). Renee Taylor continued to supervise them, and after she left, Scientologist Robin Rhyne took over.

Despite occasional memos from both Dr. Karger and Renee Taylor claiming that the courses did not involve religion, several factors conveyed the opposite message. Certainly the fact that Scientologists supervised the courses was one factor (see Sneeringer [Deposition], 1999: 13, 16), and the fact that some I-20 staff took the courses at Scientology's Casa Linda Mission. Moreover, all of the courses contained terms that were unique to Scientology and that were not used outside of a Scientology environment. For completing courses that I-20 AMC either recommended or required, aggrieved parties Cindy Bishop and Stephanie Brady received course completion certificates produced by the "Church of Scientology Department of Validity" that was issued at Scientology's Celebrity Center Dallas and was signed by (among others) Scientologist and I-20 AMC course supervisor, Renee Taylor.

Most dramatically, however, the Mission Courses contained purely religious Scientology terms (see Sneeringer [Deposition], 1999: 11-12). For example, both aggrieved parties Cindy Bishop and Stephanie Brady took the Mission Course entitled, "Overcoming Ups & Downs in Life Course." (The EEOC has Cynthia A. Bishop's course certification that the Church of Scientology Department of Validity issued, and I-20 AMC submitted a copy of Stephanie Brady's completed courses [Bates Stamp Number D-05206]). I-20 AMC also submitted the "checksheet" for that course, which is a list of its contents that the staff member initials and dates when she completes each item. The first item on the checksheet required that the staff member "[r]ead the article 'What is Scientology?' on page 15 in your course booklet" (Bates Stamp Number D-02178). Cindy Bishop had to read "What is Scientology?" again when she did the course entitled, "The How to Make Work Easier" (Bates Stamp Number D-02227; see Sisk [Deposition], 1999: 25). Likewise, on another of Cindy Bishop's checksheets (apparently to a Communications Course) that I-20 AMC provided, she had to "[r]ead 'A Brief Description of Scientology' on page 17" (Bates Stamp Number D-02218).

In another set of documents that I-20 AMC provided, an actual copy of the item, "A Brief Description of Scientology" is included in an update to the "Success through Communication Course" (Bates Stamp Number D-01132 through D-01134). The description states, "Scientology is a religious philosophy in its highest meaning because it brings man to total freedom and truth" (Bates Stamp Number D-01132). The next page contains a description of a Scientology religious term, "thetan":

Everything in Scientology is based on a very important principle: A person is much more than his [sic] body or his mind. The individual is known in Scientology to be, not his body or his brain, but a *spiritual being*.

There is more to *you* than your body or your mind. YOU are, basically, a spiritual being.

The term *soul* has developed many other meanings from use in other religions and practices, so in Scientology a new term is used to identify the spiritual being.

This term is *thetan*. It comes from the Greek letter, *theta*, which is the traditional symbol for thought or spirit.

You are a thetan, a spiritual being. You are not your eyes, your brain or your possessions. You are *you*. You do not *have* a thetan, something you keep apart from yourself, you *are* a thetan. You would not speak of 'my thetan', you would speak of 'me' (Bates Stamp Number D-01133, italics in original).

The discussion of a thetan continues on the next page, with a sketch of a man with a thetan etched above his head (Bates Stamp Number D-01134). Even Dr. Karger acknowledged that "thetan" was a Scientology religious term, and she could not think of any business application for it (Karger [Deposition], 1999: 200-201). Nevertheless, it appears prominently in this update to a Mission Course that I-20 AMC staff took.

Also in the "Success Through Communication Course Pack Update" is the statement that some of the communication drills cause "exteriorization" which the course pack itself defines as:

the action of moving oneself (as a spirit) out of the body; the placing of distance between oneself and the body" (Bates Stamp Number D-01145). The course pack itself says, 'Some students will spend upwards of fifteen hours on TR Zero-A or TR Zero-B [i.e, particular exercises in the course]. But the wins are enormous! Students report exteriorization and huge realizations such as certainty of being located for the first time. Results like these are common when the drills are done until the end phenomena are attained. This means DOING THE DRILL LONG ENOUGH TO ALLOW ANY MANIFESTATIONS TO TURN ON AND THEN CONTINUING TO WHERE THEY ARE FLATTENED AND THE STUDENT TRULY HAS ACHIEVED THE END PHENOMENA OF THE DRILL (Bates Stamp Number D-01145).

Once again, Dr. Karger admitted that "exteriorization" was a Scientology religious term for which she did not know any business application (Karger [Deposition]. 1999: 204-205).

C. Pressure to Take the Courses--The staff at I-20 AMC felt pressure to take these courses, and persons aspiring to management had to take them as a term and condition of promotion. On February 13, 1995, for example, Course Supervisor Renee Taylor sent a memo to staff in which she stated, "[t]he extra courses are not mandatory, unless you wish to be in management, and then some are since we need to be doing the same things" (Bates Stamp Number 01621). The next day Dr. Karger sent out a memo that identified three courses that "are recommended for the general staff member," all of which were among the "Mission Courses" that came from Renee Taylor's work as a course supervisor at Scientology's Casa Linda Mission.(Bates Stamp Number 01619). She, too, indicated that upper level management required additional courses, stating "[o]ther management courses are reserved for upper management who need skills for managing I-20" (Bates Stamp Number 01619; see Wheeler [Deposition], 1999: 16). Several months later, Renee Taylor sent out an ominous memo regarding attendance at hat pack and course sessions, in which she stated:

From this point forward, if you are late or absent [from a hatting or course session], a 'Late/Absent Report' will be forwarded to your clinic/employer for your Personnel file. What your employer does with it is up to her, but if I were sinking money into my employees I would be watching who was taking advantage of it and improving, and who was wasting it and make future staffing decisions accordingly (Bates Stamp Number D-03355).

I-20 staff, therefore, felt pressure to take the Scientology inspired courses (and had to do so if they wanted to enter the higher levels of management), but if they began a course and became offended by the religious content in it they would be punished for dropping out.

D. The Communication Drills and Their Religious Relevance--In addition to all of the other reasons that I-20 staff objected to having to take Scientology courses (especially ones with religious content), several of them questioned the relevance of much of the material to their jobs. For example, one former I-20 AMC employee, Cathy Sisk, wrote about the courses and exercises that she took as an employee, and the first "exercise" that she identified was "Communication" (Sisk [Affidavit], 1997: 1). She said that she had "to sit knee to knee with a stranger Tim (name unknown) with my eyes closed until time was called. Time was called after 2 hours and 20 minutes passed" (Sisk [Affidavit], 1997: 1; Sisk [Deposition], 1999: 24; see Winnett [Deposition], 1999: 22). During her second exercise, Ms. Sisk "sat with my 'twin' Tim (name unknown) [and] we were told . . . to stare at each other and control the conversation" (Sisk [Affidavit]: 1997: 1; Sisk [Deposition], 1999: 24). Ms. Sisk "came to realize [that] this is how they break you down [--]by controlling you through this course" (Sisk [Affidavit], 1997: 2). There is some merit in Sisk's interpretation, and it is worth pointing out that these two exercises actually described drills (called Training Routines or TRs) that are part of Scientology's standard Communication Course. The first two TRs, former member-turned-author [Jon Atack](#) wrote:

are supposed to help you focus your attention on the person you are talking to. Two people sit facing each other, without speaking or moving. In the first drill (OT TR-O) they sit with their eyes closed, in the second (TR-O) open and staring at one another. These drill are often done for hours without pause, and form part of most Scientology courses ([Atack, 1990: 14](#)).

In summary, the Communication course that at least one I-20 AMC employee took was the same one that people take who are entering Scientology itself. Indeed, these 'skills' involving undivided attention actually may be preliminary training for someone to become a Scientology spiritual counsellor called an auditor, since an auditor has to give focused, unemotional attention to the preclear.

E. Auditing in the I-20 AMC Workplace--Aggrieved party Stephanie Brady indicated that another I-20 AMC staff member who was Scientologist--Vicki Densmore--"would do something called auditing" (Brady Statement, 1997: 3). Broadly speaking, auditing takes two forms. First, the older style of auditing, which is based upon Scientology's forerunner, Dianetics, involves a 'counsellor' (called an auditor) asking a client (often called a preclear) to identify a traumatic incident in one's life and talk about it. Usually the preclear is using an E-Meter. In Scientology auditing (of which several forms exist), most commonly an auditor takes the 'client' through long lists of words and registers the E-Meter responses to them.

Because Ms. Brady indicated, "Vicky would ask details and you would repeat them to her," she probably underwent a Dianetics form of auditing--one that specifically focused on healing. The debate about Scientology's (and Dianetics's) relationship to healing claims is among the contentious issues that exist about the contemporary Scientology organization. No doubt exists, however, that both Scientology and its Dianetics precursor believed that auditing could heal and/or cure a wide range of illnesses.

Healing claims in Dianetics date to one of the earliest publications of the movement. In a long article that appeared before Hubbard's publication of his seminal book, Dianetics: The Modern Science of Mental Health (1950), Hubbard provided a statement about the cause of illness that weaves through the Scientology organization to this day: "13. Dianetics sets forth the non-germ theory of disease, embracing, it has been estimated by competent physicians, the cure of some seventy percent of pathology" (Hubbard, 1950: 86). The belief that Dianetics can cure a range of illnesses entered into the doctrines of Scientology, which now cloaks any claims of physical cures as examples of "spiritual" healing (and hence a protected religious activity). Underlying alleged physical cures is the claim that seventy percent of human illnesses are caused by negative incidents encoded in a level of the mind that records all events. These incidents get re-stimulated when something occurs that resembles the initial causative occurrence. Moreover, the initial causative occurrence could have occurred in this life or (Scientologists believe) in past lives. By identifying those occurrences to an auditor, their impact upon individuals diminishes (usually through repetitive re-statement of the initial trauma) and eventually dissipates (so Scientology proponents say). This pattern supports what Ms. Brady said, which was, "Vicky would ask details and you would repeat them to her" (Brady, 1997: 3). This reputed treatment is deeply rooted in the supernatural beliefs of Scientologists, and it is a Scientology religious practice that an aggrieved party experienced in the workplace.

V. CONCLUSION

In conclusion, I-20 Animal Medical Center subjected its employees to practices and course work that was infused with Scientology's religious terminology and teachings, and that served as a recruitment tool to encourage employees to step onto the "Bridge."

My curriculum vitae is attached to this report, and it lists all of my publications for the past ten years along with all court cases in which I have been retained as an expert. For preparing this report I have been compensated at the rate of \$200.00 per hour. I have worked approximately 108 hours to date. The exhibits that I plan to use in support of my opinion are included in plaintiff's exhibit list.

Submitted by Stephen A. Kent (Ph.D.)

(signed) _____

(Date) _____

BIBLIOGRAPHY

Allen, Casey. [No Date]. "EEOC Affidavit." 1p.

Articles of Incorporation. 1983. "Articles of Incorporation of World Institute of Scientology Enterprises." Filed in the Office of the Secretary of State of California. (February 1): 4pp. [Plus two witnessed certificates by California Secretary of State, Bill Jones].

[Atack, Jon](#). 1990. [A Piece of Blue Sky: Scientology, Dianetics and L. Ron Hubbard Exposed](#). New York: Lyle Stuart.

Brady, Stephanie. 1997. [Statement]. (August 28): 4pp.

Church of Scientology International. 1992. [What is Scientology?](#) Los Angeles: Bridge Publications, Inc.

-----, 1994. [The Scientology Handbook](#). Compiled by the LRH Compilations Staff. Los Angeles: Bridge Publications, Inc.

Church of Scientology of Minnesota v. Department of Health, Education and Welfare. 1971. "Order." No. 4-69 Civ. 86 (341 F.Supp. 563). (July 20): 563-569.

Equal Employment Opportunity Commission. 1998. "Complaint" in "Equal Employment Opportunity Commission v. I-20 AMC Animal Medical Center." Civil Action No. 398CV2316-X. (September 30): 7pp.

Hall, Deana. 1998. "[Managing to Recruit: Religious Conversion in the Workplace](#)." [Sociology of Religion](#) 59 No. 4: 393-410.

Hubbard, L. Ron. 1950. "Dianetics: The Evolution of a Science." [Astounding Science Fiction](#) XLV No. 3 (May): 43ff.

-----, 1960. "Security Check." [Hubbard Communications Office Bulletin](#) (February 3): 1p.

-----, 1961. "Johannesburg Security Check." [Hubbard Communications Office Policy Letter](#) (April 7): 242-245.

-----, 1976. [Modern Management Technology Defined](#). Copenhagen: New Era Publications.

Internal Revenue Service. 1993. "[Closing Agreement On Final Determination Covering Specific Matters](#)." 59pp; Downloaded from the <[Operation Clambake](#)> Website on January 6, 1998.

Miller, Russell. 1987. [Bare-Faced Messiah. The True Story of L. Ron Hubbard](#). London: Michael Joseph.

Sappell, Joel and Robert W. Welkos. 1990. "[Defining the Theology](#)." [Los Angeles Times](#) (June 24): A36.

Sisk, Cathy. 1997. "EEOC Affidavit." [No Date]: 4pp.

-----, 1999. "Deposition." (October 22): 50pp.

Sneeringer, Alicia. 1999. "Deposition." (October 22): 39pp.

Steele, Todd. 1997, "EEOC Affidavit." [No Date]: 3pp.

Wheeler, Barbara. 1999 "Deposition." (October 22): 50pp.

Winnett, Ronna. 1999. "Deposition." (October 22): 51pp.

WISE. 1990. "Get Ethics and Sanity into your Business." Pamphlet.

-----, 1992. "Join The Group Taking Responsibility for Getting LRH Admin Tech Into Use." Pamphlet [4pp].

- WISE International. 1992a. "Sterling Management Systems." Prosperity Issue 28: 5.
- , 1992b. "Consultants Introducing Their Clients to Scientology: Getting Businessmen Onto The Bridge." Prosperity Issue 30 (1992): 13.
- , 1992c. "Getting Clients up The Bridge." Prosperity Issue 30 (1992): 14.
- , 1992d. "Client Wins on The Bridge." Prosperity Issue 30 (1992): 15.