

## ATTENTION OF GERRY ARMSTRONG

H M Barlow  
First  
Plaintiff  
Sworn February 1994

IN THE HIGH COURT OF JUSTICE

1984 S. No. 1675

QUEEN'S BENCH DIVISION

B E T W E E N :

CHURCH OF SCIENTOLOGY ADVANCED ORGANISATION  
SAINT HILL EUROPE AND AFRICA

Plaintiff

- and -

(1) ROBIN SCOTT  
(2) RON LAWLEY  
(3) MORAG BELLMAINE  
(4) STEVEN BISBEY

Defendants

AFFIDAVIT OF  
HELEN MARGARET BARLOW

RECEIVED

FEB 08 1994

HUB LAW OFFICES

I, HELEN MARGARET BARLOW, Solicitor's clerk with the firm of Allen, Ticehurst & Bird of 59-63 Railway Approach, East Grinstead, West Sussex RH19 1BT MAKE OATH and say as follows:

1. I am a solicitor's clerk employed by the firm of Allen, Ticehurst & Bird which firm has, since 26th November 1993, had the conduct of these proceedings on behalf of the Plaintiff in place of its former Solicitors.
2. I am authorised to make this Affidavit on behalf of the Plaintiff in reply to:-

of the Church of Scientology can be found in Chapter 21 of Exhibit HMB 1 at pp. 349-359.

9. The Second Defendant refers to Church of Spiritual Technology ("CST"). A short description of CST is found at page 8 of the booklet at Exhibit HMB 4. The Plaintiff is not aware of what documents CST may or may not have, and in any event any such documents are not in the Plaintiff's possession, custody or power. Furthermore, as can be seen from Exhibit HMB 4 at page 8, CST, while a Church of Scientology, is not part of the Scientology hierarchy. Like other Churches of Scientology, it is a separate corporate entity. Unlike the majority of those churches, however, it is not involved in the delivery of religious services to the public, but has the exclusive function of acting as an archives for the preservation of the many religious writings and taped lectures of L. Ron Hubbard.
10. The Second Defendant refers in paragraph 2 to an Affidavit of one Gerald Armstrong, sworn over 11 years ago (not sworn in these proceedings). I am informed by the Plaintiff and verily believe that Gerald Armstrong ("Armstrong") is an individual involved in litigation with Church of Scientology International and Church of Scientology of California. Armstrong is a long-time attacker of the Scientology religion, who, since the time of execution of the Affidavit referred to by the Second Defendant, testified in another case (Julie Christofferson-Titchbourne

y. Church of Scientology Mission of Davis et al Circuit Court of the State of Oregon, Multnomah County, No. A7704-05184. His testimony in this case directly contradicts the proposition on which the Second Defendant relies in support of his assertion that L Ron Hubbard was a managing agent of the Plaintiff. The following excerpt from a video tape transcript, admitted into evidence in the above-referenced case, shows that Armstrong had no knowledge of who was running the Church or who its managing agent was. In the transcript, "G" is Armstrong, "M" is Mike Rinder, a Church executive in Los Angeles.

"G: It can be done during the chaos of whatever RTC, ASI's got going. Who runs the organisation right now?

M: Which organisation?

G: All of it. Who runs it?

M: Well, it gets run through CMO Int.

G: And who are those people?

M: Well, you know, probably the same guys as when you were around."

I am informed by the Church of Scientology International's United States attorneys and verily believe that the videotape from which this transcript was made is a recording of a meeting set up by Armstrong after his sudden departure from the staff of Church of Scientology of California in late 1981. Armstrong had been in charge of a large quantity of personal and private documents belonging to L Ron Hubbard. Part of Armstrong's duties included research to support the work of an author who had been retained to write a biography of Mr Hubbard. After

Armstrong's departure, in the summer of 1982, the Church received evidence that Armstrong had stolen thousands of documents from those archives when he left the Church. Armstrong refused the demands of the Church's Counsel that he return the documents. Litigation against Armstrong was thereafter filed to recover the documents, while Armstrong pursued a plan to infiltrate and take over the Church. The meeting recorded in the videotape excerpted above was part of Armstrong's conspiracy. Armstrong had contacted Church staff members who, while pretending to work with Armstrong, actually remained loyal to the Church. They received permission from the Los Angeles Police Department to tape this meeting. The videotape further shows that Armstrong intended to (1) recruit additional persons to create "as much shit for the organization as possible"; (2) foster this plan by creating sham lawsuits against the Church; (3) seed the Church's files with forged and "incriminating" documents which would then be seized in a raid by the IRS as part of its investigations. He claimed the ability to create documents with relative ease because he "did it for a living"; (4) take control of the Church after such a raid; and (5) lie under oath to prevent discovery and to protect his co-conspirators, as evidenced by his statements that "we don't have to prove a goddam thing. We don't have to prove shit; we just have to allege it" and that if he is deposed "no-one will ever get any names, any communications, any times, any dates or anything out of me, that's just the way it is." There is now produced and

shown to me marked "HMB 7" a copy of the pertinent extracts from that tape transcript. More recently Armstrong has been quoted in the press, expressing his opposition to the use of currency as the basis of the economy, as the self-proclaimed founder of the "Organisation of United Renunciants". There is now produced and shown to me marked "HMB 8" a copy of a newspaper article containing information on Mr Armstrong's latest activities, including a nude photograph of Mr Armstrong.

11. I am informed by the Plaintiff and verily believe that L Ron Hubbard ran the early Dianetics and Scientology organisations until 1966, when he retired from running them on a day to day basis and turned this function over to Scientology Church executives; and that he continued to take an interest in the Church's expansion and advised on administrative matters when specifically asked for advice but he mainly spent his time researching the upper levels of Scientology and codifying the technology. I refer this Honourable Court to pp. 633-635 of Exhibit HMB 1 which gives information relating to that period of L Ron Hubbard's life. The Second Defendant's claims that Mr Hubbard controlled the Church of Scientology and received inurement of millions of dollars of funds from the Church was exposed as false by the IRS. If such allegations had not been proven false in the IRS's extensive and exhaustive enquiry which went back a number of years before L Ron Hubbard's death, the IRS would never have granted exemption