

DECLARATION OF GUILLAUME LESEVRE

I, GUILLUAUME LESEVRE, declare and say

1. I am Executive Director International ("ED INT") of the church of Scientology international, ("CSI"), a non profit religious corporation formed and operated pursuant to the laws of the State of California, I have continuously held this position since the middle of September, 1982. The purpose of this declaration is to apprise the Court of the ecclesiastical structure of the Church of Scientology ("Church") and specifically CSI in order to provide a proper context in which to understand L. Ron Hubbard's lack of either corporate or ecclesiastical managerial control over the Church and to correct plaintiff's apparent contentions that Mr. Hubbard is a managing agent of the Church.

2. As Executive Director International, I occupy the highest management post in the ecclesiastical network of the Church. I am responsible for the coordination of strategic planning, broad scale expansion plans and resolutions concerning the development and propagation of Scientology internationally. These plans and resolutions are then implemented and executed by upper middle management units in the Church ecclesiastical structure. I am assisted in this role by my personal staff, known as the Senior Executive Strata. (See "Your Guide to Management", a recent Church publication which explains in detail the ecclesiastical structure of the Church, attached to Mr. Yager's declaration.)

Each member of the Senior Executive Strata is responsible for a specific function of international Scientology. These functions are the ingredients of expansion that are executed in all echelons of the Church. For example, Establishment is one such function which consists of ensuring that our Churches are adequately established to perform their duties regarding personnel, and that Churches have proper facilities and equipment. Another important function is to ensure that our parishioners are active in disseminating the Scientology religion in their area and are helping the community. There are twelve such functions in the Church. As Executive Director International, I am responsible for coordinating these functions and seeing that they are performed throughout the world. My coordination role is performed as Chairman of the International Management Executive Coordination Committee which is composed of myself and the Senior Executive Strata and which meets on a daily basis to coordinate the actions of each member.

3. In my role as Chairman of the above committee and as Executive Director International, I routinely report to the highest ecclesiastical body of the Church, the Watchdog Committee ("WDC"). The WDC is an inspection entity which is different from managing. It makes sure that things get managed. WDC ensures that management units for the Church exist and that management is taking place and the Church is managed so as to expand in an efficient manner and exactly in accordance with the Church's religious policies. As such, it

performs the oversight of my office and the Senior Executive Strata. Neither myself nor any member of my staff is a member of the WDC.

4. As Executive Director International, I am very familiar with the ecclesiastical structure and hierarchy of the Churches of Scientology. L. Ron Hubbard holds no position within the ecclesiastical management structure of International Scientology nor did he hold such a position when his deposition was noticed in this action. Mr. Hubbard is the Founder of the Scientology religion and the spiritual guide and teacher of all Scientologists and of all the Churches and Missions of Scientology. His writings and recorded lectures form the Scriptures of all the Churches and Missions of Scientology - the Scriptures include all of the doctrines, tenets, sacraments, rituals and practices, axioms, codes and Creed of Scientology. This body consists of some 50 to 60 books, thousands of recorded lectures, and numerous other writings in the form of individual articles, bulletins and policy letters. The Scriptures of Scientology are used in the practice of auditing (which is the central religious practice of Scientology) and the training of auditors to the exclusion of all other materials. (A recent Church publication, entitled "Scientology - What is it?" describes auditing and the religion of Scientology and is attached hereto as Exhibit A).

5. Although Mr. Hubbard is revered by Scientologists as the Founder of our religion and the originator of Scientology Scripture, Mr. Hubbard holds no corporate, legal or

managerial position whatsoever in any Church of Scientology and is not an employee of the Church of Scientology of California, Inc. or any other Church of Scientology. Further, although Executive Director International functions and expansion planning emanate from Scripture as created by Mr. Hubbard, Mr. Hubbard does not personally oversee the ecclesiastical management structure of the Church and is not involved in the approval of my decisions either directly or indirectly. Mr. Hubbard, as Founder, can, if he so chooses, speak on behalf of the religion solely on an ecclesiastical basis in order to expound upon his religious works, their nature and applicability. However, Mr. Hubbard is not authorized by the Church to sign contracts or agreements on its behalf, nor is he invested with any power or authority to act for or on its behalf. Mr. Hubbard has not been invested by the Church with any powers, broad general powers or otherwise, to exercise judgment and discretion in or over corporate affairs of the Church. Furthermore, Mr. Hubbard has no legal power or authority to hire or fire any employee of any Church of Scientology, nor is he a signatory over any of the Churches' financial accounts.

6. Since I assumed the post of Executive Director International in September of 1982, I have never met personally with Mr. Hubbard. Indeed, I have never met Mr. Hubbard. Furthermore, since I assumed the post of Executive Director International, communications to and from him have been very limited. I have never possessed a means of

initiating a communication directly or indirectly to Mr. Hubbard. Mr. Hubbard alone has originated each means of communication and has done so totally at his own discretion. Mr. Hubbard has not provided me or anyone else with a telephone number to call or to contact him, nor an address where I or anyone else could send mail. When Mr. Hubbard desired to receive or send communications, he originated a method of transmitting limited communications via a series of relays and drops where communications could be exchanged through intermediaries.

7. Only when Mr. Hubbard initiated communication was information sent to him. No decisions, either major or minor, concerning Church affairs require or receive approval by Mr. Hubbard prior to their execution. Indeed, even if I desired Mr. Hubbard's input on a specific matter, it would be impossible to do so as I know of no means of communicating to Mr. Hubbard nor am I aware of his current whereabouts. Moreover, the current ecclesiastical management of the Church is composed of experienced Scientologists competent in running the Church's religious affairs who have been responsible for the continued rapid expansion of the Scientology faith. Rather than burden Mr. Hubbard with the task of being involved with ecclesiastical management of the Church, the current ecclesiastical hierarchy of the Church has put into place a successful and efficient system which operates independently of Mr. Hubbard.

This is an essential goal of the Church so that the Founder may continue his religious research and writing uninterrupted as he wishes. Current ecclesiastical management has achieved this goal.

8. As with Mr. Yager, the nature of my communications with Mr. Hubbard revolved primarily around the dissemination of the Scientology religion. In October of 1983, Mr. Hubbard initiated communication with the Church after a long period of no communication and inquired as to how things were going. I was involved in the process of providing Mr. Hubbard with written communications on the dissemination and delivery of Scientology religious services. These written communications continued until the spring of 1984. Further, I also was involved, along with my personal staff and the WDC, in preparing a list of the accomplishments and statistics of Scientology which was forwarded to Mr. Hubbard in late 1983. This compilation formed the basis for Ron's Journal 38, which was released on New Year's day, 1984. Mr. Hubbard emphasized in that Journal that he had not been involved with active management for a long while, something I can personally attest to.

The management function of the Church has been and continues to be vested in the WDC and the Senior Executive International Strata.

9. Mr. Hubbard has been and will always be revered by all Scientologists as the Founder of our religion and as the sole source of our Scripture. However, Mr. Hubbard's revered

and unique role in Scientology simply does not somehow make him a managing agent of the Church of Scientology, even in the ecclesiastical sphere.

10. in May of 1984, I received a copy of the Church's last communication from Mr. Hubbard. He stated he was going traveling and that he was sure that the dissemination and delivery of Scientology services would continue to expand. Based upon my personal knowledge, my position as Executive Director International and Chairman of the International Management Executive Coordination Committee, I have determined that there have been no communications to senior Church officials from Mr. Hubbard whatsoever since late spring of 1984.

11. I can also attest that neither I, nor anyone else within the Churches of Scientology to my knowledge, has knowledge of Mr. Hubbard's whereabouts. I know of no means or method to even communicate the Court's Order of March 13, 1985, to Mr. Hubbard. Mr. Hubbard has chosen to continue his writings and research uninterrupted.

12. In short, I am aware of no individual in the Church who is aware of Mr. Hubbard's whereabouts. Mr. Hubbard has no legal authority over any Church of Scientology and has not chosen to exercise any contact concerning even ecclesiastical matters with any Church since late spring of 1984.

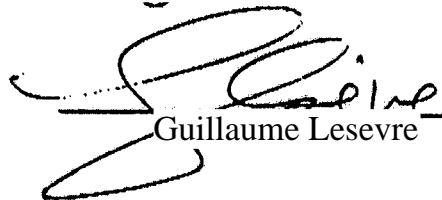
13. Accordingly, having no knowledge whatsoever of Mr. Hubbard's present whereabouts makes it totally impossible to

advise him of the notice of deposition in this matter.

14. Neither I, nor any person or corporation with whom I am familiar, including the Church of Scientology of California, Inc., has the ability to require, or direct, L. Ron Hubbard to perform any act on behalf of the Church of Scientology of California. Accordingly, Mr. Hubbard cannot be depended upon to carry out any direction by the Church to give testimony at a deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this tenth day of may , 1985, at
Los Angeles, California.


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2/7/94

12 Attorneys for Plaintiff
13 CHURCH OF SCIENTOLOGY INTERNATIONAL

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

16 CHURCH OF SCIENTOLOGY) CASE NO.
17 INTERNATIONAL, a California Non-) CV 91-6426 HLH (Tx)
18 profit Religious Organization,)
19 Plaintiff,) DECLARATION OF
20) GUILLAUME LESEVRE
21 vs.)
22 STEVEN FISHMAN and UWE GEERTZ,)
23 Defendants.)

24 I, GUILLAUME LESEVRE, declare as follows:

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

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

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

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

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

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

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

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

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

12 8.1 report to the Chairman of the Watchdog Committee, the
13 ecclesiastical head of CSI. There is no other Church executive
14 who is senior to me or to whom I report. The functions of the
15 Watchdog Committee and its Chairman are different from my duties.
16 Those ecclesiastical bodies see to it that the management
17 functions performed by CSI are carried out in accordance with the
18 policies of the Church.

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

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

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

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

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

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

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

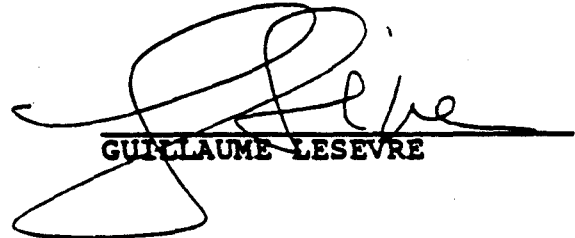
15 14. As an executive of CSI for over a decade, I have
16 personal knowledge that CSI is operated and managed only by its
17 own staff, officers and directors. CSI maintains its own
18 accounts, separate from any other Church of Scientology. CSI
19 does not employ any staff which are also employed by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

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

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

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

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

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21 **GUILAUME LESEVRE**
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