



1 action, and CSI has no records showing showing such contact.

2 7. As a nonprofit corporation, CSI is not own by anyone..  
3 It has no stock or other certificates of ownership. It has no  
4 shareholders, but it has trustees and is managed by its nonprofit  
5 directors and officers. None of CSI's officers, directors or  
6 employees are officers, directors, employees or owners of the  
7 other corporations which are defendants in this action.

8 8. CSI is a fully functional and solvent corporation and  
9 has been since its inception. CSI has its own separate financial  
10 statements, tax records, and tax returns. CSI controls and  
11 maintains its own separate bank accounts and has done so since  
12 its inception. These accounts are utilized exclusively for the  
13 deposit of its own income and for the payment of its own debts.  
14 CSI owns its own assets, which it does not and would not transfer  
15 to other corporations or persons unless there was a sale of such  
16 assets. CSI does not use the same offices as RTC, Orange County  
17 or Sterling Management Systems.

18 9. CSI does not conceal its corporate identity in its  
19 dealings with creditors or any other persons.

20 10. CSI does not assert responsibility for the debts of any  
21 other corporation. As part of the standard licensing agreement  
22 under which CSI is licensed by RTC to use trade marks held by  
23 RTC, CSI does cover some legal costs of RTC.

24 11. CSI is not aware of any other corporation that asserts  
25 responsibility for CSI's debts.

26 12. CSI does not manage or control the corporate affairs of  
27 any other corporation.

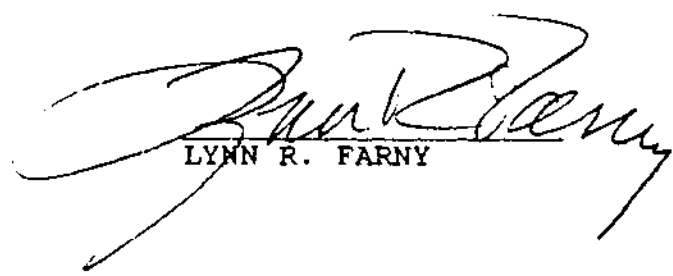
28 13. CSI does not receive funds from Sterling Management

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Systems or Religious Technology Center. The Church of  
Scientology of Orange County does contribute a small percent--  
of its income to CSI as the Mother Church of the Scientology  
religion,

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

Executed this 18th day of September, 1992 at Los Angeles,  
California.



LYNN R. FARNY

<b>Category</b>	<b>Court Document</b>
<b>Title</b>	<b>RTC vs. Arnaldo Lerma et al Declaration of Lynn R. Farney</b>
<b>Source</b>	<b>"alt.religion.scientology"</b>
<b>Author</b>	<b>"Secretary CSI" Lynn R. Farney</b>
<b>Date</b>	<b>August 21<sup>st</sup>, 1995</b>

**Description:**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

RELIGIOUS TECHNOLOGY CENTER, a	)	
California non-profit religious	)	
corporation,	)	CIVIL ACTION NO.
	)	95-1107-A
Plaintiff,	)	
	)	
v.	)	
ARNALDO PAGLIARINI LERMA, an	)	
individual; DIGITAL GATEWAY SYSTEMS, a	)	
Virginia corporation; THE WASHINGTON	)	
POST CORPORATION, a District of	)	
Columbia corporation; MARC FISHER, an	)	
individual; and RICHARD LEIBY, an	)	
individual,	)	
	)	
Defendants.	)	
	)	

DECLARATION OF LYNN R. FARNEY

I, LYNN R. FARNEY, hereby declare and state:

1. I am over 18 years of age and a resident of the State of California. I am the Secretary of the Church of Scientology International ("Church"), and am overall responsible for litigation involving the church.
2. On April 4, 1994, the U.S. District Court for the Central District of California in the case of Church of Scientology International v. Fishman, CV- 91-6426-HLH, refused to seal the court record which contained confidential Scientology Scriptures which are

copyrighted trade secrets of the Church. An emergency motion to seal pending appeal was filed and temporarily granted on April 13, 1995. However on April 20, 1995 the court denied the motion and unsealed the files.

3. Immediately upon receiving word of the unsealing of the Fishman case files (the same day) I arranged for paralegals and Church members to go to the clerk's office of the U.S. District Court where the files are located, to sign out the files that contain the confidential Scriptural documents so that no other public person would be able to have access to these records. The documents were kept "signed out" in a reviewing room at the courthouse until the Clerk's closing time, at which time they were delivered back to the Clerk.

4. Thereafter, every business day since the Fishman files were unsealed - continuing until the files were sealed by the federal District Court on August 15th, 1995 - two Church members have arrived at the Court Clerk's office when it has opened at 8:30 a.m. and have signed out the Fishman case files that contain the the Church's confidential Scriptures. They then either kept possession of such files in the Court's reviewing room until the Clerk's office closed at 4:00 PM or turned the files over to two other Church members at noon who kept the files until 4:00 P.M. closing time.

5. This procedure was instituted as the most effective means to ensure the continued confidentiality of the Church's confidential Scripture and trade secrets contained in the Fishman case record. Indeed the procedure was extremely effective, as the clerks log indicated that as of August 15th, 1995, no one other than Church agents has access to the records.

6. On August 14, 1995, over the protests of the Church member who had checked out the FISHMAN files that day, one volume was taken from him by a court clerk and copies were made of approximately one inch of documents. The church member, David Holt, got the woman who had requested the copies to sign the log that is kept by the court of people who are viewing documents or getting copies. A check of the court log showed that the woman had simply written that she was from the "Washington Post".

7. On the following day. August 15, 1995, I was informed that a woman who identified herself as Katherine Wexler, a reporter for the Washington Post, attempted to get the Fishman files to review. Wexler admitted that she wanted to review the files for a story she was doing. the two Church members who had checked out the files, Rory Tate and Reuben Ramos, informed Wexler that the files contained confidential material that were confidential trade secrets and were copyrighted by the Church of Scientology and that she should contact one of the Church's attorneys before she attempted to review them.

8. The plaintiff in this California case prepared and filed an emergency motion on August 15, 1995, to seal the documents in that Court's file pending final determination of the sealing issues under submission. later that day, the Court sealed the files.

9. Attached hereto as Exhibit A is a true and correct copy of the sealing order in Church of Scientology International v. Steven Fishman et al dated August 15th, 1995.

10. Efforts to get the Post to return the materials were unsuccessful and on August 19th, 1995 an article appeared entitled "Church in Cyberspace. Its Sacred Writ Is on the Net, Its Lawyers Are on the Case." A true and correct copy of this article is attached hereto as Exhibity B.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 21st day of August, 1995, at Los Angeles, California.

LYNN R. FARNEY