

GREGORY BRUCE ~~X~~ WILLARDSON

INFORMATION SHEET

1. PHYSICAL DESCRIPTION

Height: 6'-0"
Weight: 190 lbs.
Age: 31
Eyes: Blue
Hair: Brown

2. HOME ADDRESS

250 S. Roxbury Dr., Beverly Hills, Calif.

3. BUSINESS ADDRESS

Same as home address.

4. WORK HOURS

Flexible

5. AUTO DESCRIPTION

Model: 1972 Datsun Sedan
Color: White
License Plate: 871 FOF California

6. ROUTE TO WORK

Works at home.

FALSE REPORT CORRECTION

of

The Russell Cicero Affidavit

A Report
Prepared by:
The Church of Scientology
Department of
Public Relations Information

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10-3-84 BY SP-10/PLM

Original returned
Congressman Rayback 67c
8/4/78

62-117658-81

ENCLOSURE

11

TABLE OF CONTENTS

1. Section A: Falsehoods regarding the availability of Church of Scientology officials subsequent to July 8, 1977, as contained in document presented in the Appendix, FH 1 - FH 5.
2. Section B: Complete Documentation to the Contrary regarding the availability of Church of Scientology officials subsequent to July 8, 1977, as covered in Subsection B, documents DC 1 - DC 5.
3. Subsection B: Documents to the Contrary.
4. Appendix: Falsehoods.

AFFIDAVIT

WITNI) BEFORE THE JANUARY)
1978 ADDITIONAL GRAND JURY)

78 Cr. Misc.
(M. 11-186)

STATE OF NEW YORK)
COUNTY OF NEW YORK)
SOUTHERN DISTRICT OF NEW YORK) ss.:

RUSSELL CICERO, being duly sworn, deposes and

says:

1. I am a Special Agent of the Federal Bureau of Investigation ("F.B.I.") and, as such, am working on an investigation of an obstruction of justice relating to the filing of Indictment 73 Cr. 463 in the Southern District of New York, which charged Paulette Cooper with mailing bomb threats to the Church of Scientology and perjury. I make this affidavit to set before the Court the circumstances under which I served Paula Tyler with a Grand Jury subpoena on March 17, 1978, and my knowledge of the difficulties other Agents of the F.B.I. have encountered serving other members of the Church of Scientology.

2. On March 17, 1978, at approximately 10:00 a.m., I went with Special Agent Robert Vericker of the F.B.I. to the Scientology Center, 500 West End Avenue, New York, New York, in order to serve a Grand Jury subpoena on Paula Tyler. The Scientology Center is a multi-story building which has residential facilities and office space. The elevator operator and the receptionist both acknowledged that Paula Tyler was in the building. I asked the receptionist for Paula Tyler, and the receptionist referred me to

... myself to Mr. [redacted] as an F.B.I. Agent and explained that I had a Grand Jury subpoena to serve Paula Tyler, which I showed to him. He would not indicate whether Paula Tyler was present in the building, he asked me to leave the building and he told me that he was going to call an attorney. I left the building and called Assistant United States Attorney Denise Cote from a telephone on the street corner. She told me to go to the United States Courthouse at Foley Square. At approximately 12:45 p.m., I served Paula Tyler with the Grand Jury subpoena, in the presence of her attorney and Assistant United States Attorney Cote, on the fourteenth floor of the U.S. Courthouse at Foley Square, New York, New York.

3. During the Fall and Winter of 1977 and the Spring of 1978 I have had conversations with other F.B.I. Agents including Agent Joseph Varley of the Los Angeles, California, Office, in which I learned that there is an investigation in Washington, D. C. and in Los Angeles, California, regarding the theft of government documents by members of the Church of Scientology. In the course of those conversations I was told that other Agents of the F.B.I. have experienced great difficulty in serving Grand Jury subpoenas on members of the Church of Scientology. On May 15, 1978, I learned the following information from Agent Varley. Three members of the Church of Scientology, Gregory Williardson, John Lake and Richard Weigand, have each taken up full-time residence at Scientology facilities following attempts by the F.B.I. to serve them with subpoenas. Gregory Williardson and

600 room building, formerly a hotel, located in Los Angeles, California. One is at Cedars-Sinai Complex, formerly a 6,000 room hospital, in Los Angeles, California. F.B.I. Agents have been unable to gain access to either of these residences in order to effect service. Henning Heldt, and Irene Mele, two officials of the Church of Scientology residing in Los Angeles, remained in their private residences refusing to answer the door for a period of days in October of 1977, after the F.B.I. tried to serve them with subpoenas. The F.B.I. finally served each of these individuals after waiting outside the residences for an extended period of time; two days in the case of Mr. Heldt and one week in the case of Ms. Mele.

4. Finally, Agent Varley told me on May 15, 1978, that Robert Sarno, an attorney for the Church of Scientology in California, had initially offered to make available members of the Church for whom the Government indicated it had subpoenas. Two days after his offer, attorney Sarno indicated that he would be unable to make his clients available to accept service of subpoenas.

Dated: May 19, 1978

New York, New York

Russell E Cicero

RUSSELL CICERO
Special Agent of the Federal Bureau
of Investigation

Sworn to before me this
day of May 1978.

Section A: Falsehoods regarding the availability of Church of Scientology officials subsequent to July 8, 1977.

Russell Cicero has made or had reported to him the following falsehoods regarding the availability of Church of Scientology officials subsequent to July 8, 1977.

- a. That Irene Mele, an official of the Church of Scientology, remained in her private residence for a period of days in October of 1977, after the FBI tried to serve her with a subpoena. (The period referred to is the early part of October.)
(See Appendix, document FH 1)
- b. That Henning Heldt, an official of the Church of Scientology, remained in his private residence refusing to answer the door for a period of days in October of 1977, after the FBI tried to serve him with a subpoena. (Again the period referred to is the early part of October.)
(See Appendix, document FH 2)
- c. That Richard Weigand, a member of the Church of Scientology, took up full-time residence at Scientology facilities following attempts by the FBI to serve him with a subpoena.
(See Appendix, document FH 3)
- d. That Gregory Willardson, a member of the Church of Scientology, took up full-time residence at Scientology facilities following attempts by the FBI to serve him with a subpoena.
(See Appendix, document FH 4)
- e. That John Lake, a member of the Church of Scientology, took up full-time residence at Scientology facilities following attempts by the FBI to serve him with a subpoena.
(See Appendix, document FH 5)
- f. That special agent Russel Cicero introduced himself as an FBI agent and explained that he had a Grand Jury subpoena to serve Paula Tyler, which he showed to Mr. Boyd. That Mr. Boyd would not indicate whether Paula Tyler was present in the building.
(See Appendix, document FH 6)

g. That Robert Sarno, an attorney of the Church of Scientology in California, had initially offered to make available members of the church for whom the Government indicated it had subpoenas. That two days after his offer, attorney Sarno indicated that he would be unable to make his clients available to accept service of subpoenas.
(See Appendix, document FH 7)

**SECTION B: COMPLETE DOCUMENTATION TO THE CONTRARY
REGARDING THE AVAILABILITY OF CHURCH OF SCIENTOLOGY
OFFICIALS SUBSEQUENT TO JULY 8, 1977.**

- A. IRENE MELE MAINTAINED A CONSISTENT SCHEDULE THROUGH-
OUT THE FIRST PART OF OCTOBER, 1977. (ON THE TWELTH
OF OCTOBER, 1977, MRS. MELE WENT TO WASHINGTON, D.C.,
TO TESTIFY.) MRS. MELE'S SCHEDULE INCLUDED LEAVING
HER RESIDENCE EVERY MORNING SHORTLY BEFORE NINE AM
AND ARRIVING BACK AT THEIR HOME EVERY NIGHT. MRS. MELE
ALSO ATE LUNCH EVERY DAY IN THE MANOR HOTEL FOR SCIEN-
TOLOGISTS DINING ROOM, AND RETURNED HOME EACH EVENING
FOR DINNER.
(SEE INDEX AT THE END OF THIS SECTION, DC 1a, 1b.)
- B. REV. HENNING HELDT MAINTAINED HIS REGULAR SCHEDULE
THROUGHOUT THE FIRST PART OF OCTOBER OF 1977 UP
UNTIL THE TIME HE WAS SERVED WITH A SUBPOENA (ON OR
ABOUT THE SEVENTH OF OCTOBER, 1977).
REV. HELDT ATTENDED A FITNESS PROGRAMME WITH HIS
WIFE AT A PUBLIC PARK EVERY MORNING, AFTER WHICH
HE WENT TO HIS OFFICE. REV. HELDT RETURNED HOME
FROM WORK EVERY DAY FOR DINNER AND SLEPT AT HIS
RESIDENCE EVERY NIGHT.
(SEE INDEX AT THE END OF THIS SECTION, DC 2a, 2b, 2c, 2d.)
- C. FROM THE FIRST WEEK IN AUGUST THROUGH THE FIRST
WEEK IN SEPTEMBER OF 1977 RICHARD WEIGAND WAS IN
CLEARWATER, FLORIDA RECEIVING SOME PASTORAL COUN-
SELING AT THE SCIENTOLOGY CHURCH THERE.
OTHER THAN THAT, MR. WEIGAND MAINTAINED HIS REGULAR
SCHEDULE OF RETURNING FROM WORK EACH NIGHT TO HIS
HOME AND FAMILY.
(SEE INDEX AT THE END OF THIS SECTION, DC 3a, 3b, 3c.)
- D. GREGORY WILLARDSON HAS LIVED AT HOME WITH HIS DAUGHTER
AND WIFE PRIOR TO AND SINCE JULY 8, 1977.
(SEE INDEX AT THE END OF THIS SECTION, DC 4.)
- E. SINCE THE FBI RAID IN JULY OF 1977, JOHN LAKE HAS
CONTINUED HIS NORMAL SCHEDULE WHICH INCLUDES TRAVEL
TO AND FROM THE CHURCH WHERE HE WORKS AND HIS PRI-
VATE RESIDENCE.
(SEE INDEX AT THE END OF THIS SECTION, DC 5.)
- F. CARGILL P. BOYD ASKED AGENT CICERO THE PURPOSE OF
HIS VISIT. AGENT CICERO INDICATED THAT IT WAS A
PERSONAL MATTER. WHEN CICERO FINALLY INDICATED
THAT HE AND HIS PARTNER WERE FBI AGENTS THERE TO
SERVE PAULA TYLER WITH A SUBPOENA, BOYD STATED
THAT HE WOULD NOT ALLOW A SUBPOENA TO BE SERVED
ON CHURCH PREMISES.

RUSSELL CICERO LEFT TO CALL HIS SUPERIOR DENISE COTE. UPON HIS RETURN, HE INFORMED BOYD THAT SHE WANTED TO TAKE ACTION AGAINST HIM UNLESS HE ALLOWED THE SUBPOENA TO BE SERVED. RUSSELL CICERO CONTRADICTED HIS OWN STATEMENT A FEW MINUTES LATER WHEN BOYD OVERHEARD HEM TELL HIS PARTNER THAT HE WAS UNABLE TO CONTACT DENISE COTE BECAUSE SHE HAD BEEN IN COURT.

(SEE INDEX AT THE END OF THIS SECTION, DC 6)

- G. IN A SWORN AFFIDAVIT, ATTORNEY SARNO STATES THAT HE HAS NO RECOLLECTION AT ALL OF MAKING SUCH A STATEMENT TO AGENT VARLEY.

(SEE INDEX AT THE END OF THIS SECTION, DC 7)