

(17) That Plaintiff could attend school at the Delphian Foundation and, following such study, be able to obtain a degree in architecture or engineering at any college in the country merely by taking a test.

Prior to and during Plaintiff's "study", Defendants concealed from Plaintiff the following material facts:

(18) The cost of study escalates rapidly following the introductory courses; and

(19) The introductory courses are designed to persuade people to take the higher level and more expensive courses."

Defendants' representations were false and were made by the Defendants willfully and maliciously or made by them with reckless disregard as to their truth or falsity....

Between July, 1976 and April, 1977, Defendants subjected Plaintiff to a program of mind manipulation that impaired her mental processes

and caused her to fail to discover Defendants' misrepresentations and other unlawful conduct until her deprogramming subsequent to April 11, 1976.

Between July, 1975 and April, 1976, Defendants used the "bait and switch" method to persuade Plaintiff to purchase more extensive higher level courses in that they first offered her low cost services and, after she showed interest in such services, persuaded her to take higher priced courses by telling her that such courses were the ones Plaintiff really needed.

Defendants and each of them induced plaintiff to join its membership when the Defendants were at all material times herein an unlawful "Pyramid Club."

Further, the Defendants and each of them impaired the free will of the Plaintiff, impaired her life choices, caused uncertainty, inadequacy and impaired her capability of directing her own life and forming reasonable judgments. Further, the Defendants

and each of them caused the Plaintiff to be held up to ridicule and humiliation, cut her off from friendly association with her friends and family, damaged her reputation in her own community and caused her to be depressed.

Plaintiff... further alleges:

That the above misrepresentations and other unlawful practices were part of a scheme to gain control of Plaintiff's mind and force her into a life of service to the Defendants. She was intentionally alienated from her family and friends. Plaintiff's ability to direct her life and form reasonable judgments was intentionally impaired by Defendants through the use of a crude polygraph, intense peer pressure and other covert means. She was coerced into performing labor for which she was not paid. She was held up to ridicule, humiliated, and forced under threat of retribution and physical harm to follow the dictates of the Defendants, and caused to give Defendants all the monies she had or could beg or borrow from others.

Memorandum



- Exec AD Adm. _____
- Exec AD Inv. _____
- Exec AD LES _____
- Asst. Dir.:
- Adm. Servs. _____
- Crim. Inv. 0
- Ident. _____
- Insp. _____
- Intell. _____
- Lab. _____
- Legal Coun. _____
- Off. Cong. & Public Affs. _____
- Rec. Mgnt. _____
- Tech. Servs. _____
- Training _____
- Telephone Rm. _____
- Director's Sec'y _____

578

To : Mr. Revell *[Handwritten initials]*

From : J. J. Schreiber *[Handwritten signature]*

Subject : SITOL

Date 3/30/83

1 - Mr. Revell
 1 - Mr. Gilbert
 1 - Mr. Schreiber
 1 - [Redacted]
 1 - Mr. Mintz
[Redacted]
 (RM. 7338)

PURPOSE: To advise of information orally given to the Bureau of Prisons concerning the captioned organization.

RECOMMENDATION: None. For information.

APPROVED: _____

[Large redacted block]

No 47 of 52 cases were shown for the Delphian School or Delphian Foundation. The only 52 cases shown were for an [Redacted]

There was also a 47 case on [Redacted] These files were not reviewed since they were on microfilm and it was deemed inappropriate by [Redacted] and [Redacted] to have them reviewed. The central indices did reveal a Freedom of Information/Privacy Acts (190) case on the Delphian School and the Delphian Foundation.

On 3/23/83, [Redacted] Portland Division, advised [Redacted] that their indices were negative concerning the supra names; however, they did have a 62 file on the Delphian Foundation which could not be located, but efforts were being made to locate it and advise FBIHQ of its contents.

(6)

68 JUL 12 1984 703

FBI/DOJ

Referred

b7c

b7c

47-56689-580

J. J. Schreiber to Mr. Revell Memorandum
Re: SITOL

b7c
On 3/25/83, SA [REDACTED] Portland Division, telephonically advised SA [REDACTED] FBIHQ, that their 62 file only contained public source information on the Delphian Foundation which consisted of local newspaper articles which indicated that this foundation was associated with the Church of Scientology. SA [REDACTED] advised that he would be forwarding a copy of this public source information to the Bureau for their records. This public source information has been received and is an enclosure to Portland's airtel to the Bureau dated 3/25/83, captioned "Delphian Foundation...", Portland file 62-3062.

Reference
[REDACTED] telephonically contacted SA [REDACTED] for information in the Bureau's 190 file and information in Portland's file 62-3062. [REDACTED] was advised that the 190 file only inferred that the Delphian school and the Delphian Foundation was connected with the Church of Scientology based upon the church's request for information regarding these organizations. [REDACTED]

[REDACTED] also understands that the Portland 62 file only reflected public source information which referred to the Delphian Foundation being associated with the Church of Scientology. [REDACTED]

Working notes and indices checks at FBIHQ are being maintained in the General Government Crimes Unit, CID, Room 5056.

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FEDERAL BUREAU OF INVESTIGATION
FOIPA DELETED PAGE INFORMATION SHEET

2 Page(s) withheld entirely at this location in the file. One or more of the following statements, where indicated, explain this deletion.

Deleted under exemption(s) b1, b7C with no segregable material available for release to you.

Information pertained only to a third party with no reference to you or the subject of your request.

Information pertained only to a third party. Your name is listed in the title only.

Documents originated with another Government agency(ies). These documents were referred to that agency(ies) for review and direct response to you.

_____ Pages contain information furnished by another Government agency(ies). You will be advised by the FBI as to the releasability of this information following our consultation with the other agency(ies).

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For your information: _____

The following number is to be used for reference regarding these pages:
47-56689 - NR 12/17/84

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X FOR THIS PAGE X
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207

18

1-23-85

UNCLAS E F T O

ROUTINE

*SER 231950Z JAN 85

FM DIRECTOR FBI (47-56689) (62-116151)

TO LEGAL ATTACHE BONN (163E-5773) ROUTINE

BT

UNCLAS E F T O

COSITOL

CHURCH OF SCIENTOLOGY; FPC-BUREAU FILES AND IDENTIFICATION

DIVISION-INFORMATION REQUESTS (MISC); OO: FBIHQ.

REURTEL 12-17-84.

THERE HAVE BEEN NUMEROUS INQUIRIES FROM CITIZENS TO THE BUREAU RE THE CHURCH OF SCIENTOLOGY (COS) DATING FROM THE 1960's.

IN MAY 1976, TWO MEMBERS OF COS IMPERSONATED IRS AGENTS AND GAINED ACCESS TO THE USA'S OFFICE IN WASH. D.C. THEY WERE DISCOVERED IN THE ACT OF REPRODUCING GOV. DOCUMENTS. THIS INCIDENT PRECIPITATED A MASSIVE INVESTIGATION BY THE FBI AGAINST VARIOUS OFFICIALS OF THE COS (SITOL) FOR VIOLATIONS RANGING FROM THEFT OF GOV. PROPERTY TO AIDING AND ABETTING.

DURING OUR INVESTIGATION, WE SEARCHED TWO COS OFFICES (CAL.

Handwritten initials

47-56689

1-23-85

5224

4892

NOT RECORDED

1 - [REDACTED] ATTN: [REDACTED]

1 - [REDACTED]

1 - [REDACTED] RM 7338

SEE NOTE PAGE 4.

FEDERAL BUREAU OF INVESTIGATION
COMMUNICATIONS SECTION

09592 19
JAN 24 1985

JAN 27 1985
FEB 7 1985

ORIGINAL FILED IN

FEB 07 1986

PAGE TWO DE HQ D207 UNCLAS E F T O

20 B WASH., D.C.) IN JULY, 1977, AND CONFISCATED OVER 20,000
DOCUMENTS.

18 IN OCT., 1979, NINE OFFICIALS OF THE COS WERE CONVICTED
FOR DIRECTING A CONSPIRACY TO STEAL GOV. DOCUMENTS ABOUT
16 THE COS.

14 IN DEC., 1980, TWO MORE OFFICIALS WERE CONVICTED. THE
INDIVIDUALS CONVICTED WERE MARY SUE HUBBARD; JANE KEMBER;
HENNING HELDT; DUKE SNIDER; GREGORY WILLARDSON; RICHARD WEIGAND;
12 MITCHELL HERMANN; CINDY RAYMOND; GERALD WOLFE; SHARON THOMAS
AND MORRIS BUDLONG.

10 AS A RESULT OF OUR INVESTIGATION, L. RON HUBBARD, FOUNDER
OF COS, REQUESTED ALL THE INFO FROM OUR FILES ON COS AND
8 HIMSELF. THE COS THEN INSTITUTED AN APPEAL ACTION AGAINST
THE FBI FOR ALL THE INFO WITHHELD.

6 THERE ARE SEVERAL CIVIL ACTIONS BY THE COS CURRENTLY
IN PROGRESS. THE DOJ AND FBI ARE DEFENDANTS IN AT LEAST
4 TWO OF THOSE CIVIL ACTIONS. BOTH ACTIONS INVOLVING THE DOJ
AND FBI ARE CASES SEEKING EQUITABLE RELIEF IN THE FORM OF
2 INJUNCTIONS PROHIBITING THE FBI AND DOJ FROM HARASSING AND
INTERFERING WITH THE CHURCH'S EXERCISE OF THEIR FIRST AMENDMENT

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PAGE 3

CONFIDENTIAL

PAGE THREE DE HQ 0207 UNCLAS E F T O

RIGHTS

[REDACTED]

b7c
b7D

INVESTIGATION FAILED TO SUBSTANTIATE THE ALLEGATIONS
AND THE U.S. ATTORNEY, TAMPA, HAS DECLINED PROSECUTION.
FOR ADDITIONAL BACKGROUND ON THE COS TWO MEMORANDA WILL
BE FORWARDED FOR YOUR REVIEW.

[REDACTED]

b7D

NO RECORD IN BUFILES RE [REDACTED]
SAN FRANCISCO, CAL.

b7c

NO CHECKS WERE CONDUCTED IN IDENT DIV.

BT

1
2

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TELETYPE TO LEGAL ATTACHE BONN (163E-5773) ROUTINE

NOTE: THIS ANSWER WAS COORDINATED WITH SA [REDACTED] LEGAL
COUNSEL DIV. [REDACTED]

b7C
b7D

Memorandum



10

Exec AD Adm. _____
 Exec AD Inv. _____
 Exec AD LES _____
 Asst. Dir.:

- Adm. Servs. _____
- Crim. Inv. _____
- Ident. _____
- Intell. _____
- Laboratory _____
- Legal Coun. _____
- Plan. & Insp. _____
- Rec. Mgnt. _____
- Tech. Servs. _____
- Training _____

Off. of Cong. & Public Affs. _____
 Telephone Rm. _____
 Director's Sec'y _____

To: MR. TOKUNAGA *TR*

Date June 4, 1985

From: R. H. Rose *R*

Subject: SITOL

PURPOSE: To submit all work requested of the Special Projects Section in connection with the above-captioned case.

RECOMMENDATION: That this memorandum and its enclosures be placed in the Bureau file.

APPROVED: Adm. Servs. _____ Laboratory *B/R*
 Crim. Inv. _____ Legal Coun. _____
 Off. of Cong. & Public Affs. _____
 Director _____
 Exec. AD-Adm. _____ Ident. _____ Rec. Mgnt. _____
 Exec. AD-Inv. _____ Inspection _____ Tech. Servs. _____
 Exec. AD-LES _____ Intell. _____ Training _____

DETAILS: All work requested of the Special Projects Section in captioned case has been completed. Therefore, the following items are being submitted for inclusion in Bureau file should they be needed for further reference:

1. Original artwork (copies and negatives).
2. Memo copies dated 7/8/80, 1/3/79 (attachment), 9/21/79 (attachment).
3. Airtel copy dated 9/17/79
4. Airtel ticklers dated 7/16/80, 10/22/80, 10/14/80, 11/10/80, 9/18/79, 11/2/78, two dated for 6/23/80, and 9/17/79.

Sealed
ENCLOSURE
 (ENCLOSURE ATTACHED)

All work requested of the Special Projects Section in the above-captioned case was handled by Visual Information Specialist

Enclosures
47-56689

(2)

47-56689-511
b7c
 JUN 20 1985

97 JUL 11 1985

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FEDERAL BUREAU OF INVESTIGATION
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26 Page(s) withheld for the following reason(s):
All are duplicates of previous serials

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47-56689-581

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