

AFFIDAVIT OF GARRY SCARFF

GARRY SCARFF, being duly sworn, hereby deposes and states:

I am a citizen of the United States and am over the age of 18. The statements herein are made of my personal knowledge and, if called as a witness, I can and will testify competently thereto.

2. I am not being paid anything to write this affidavit. I am doing so on my own free will and in fact, offered to write this as I want to unburden myself and make clear the terrible lies I have told and damage I have done to people who have never done anything to harm me in any way.

3. In January, 1997, I was contacted by Mona Botros, a German journalist putting together a "documentary" regarding Scientology.

4. At her request, I met Ms. Botros in Clearwater, Florida in mid-February, 1997, where she was with two German cameramen and a Martin Ottmann, who identified himself as a former staff member of the Church of Scientology located in Clearwater. Ms. Botros told me that she was in charge of the project. I immediately recognized that she was planning a negative one-sided story as Ottmann was clearly hostile toward the Church and so was she.

5. Ms. Botros offered to pay me \$100 per day plus travel expenses to accompany her to Southern California, on the basis that I could and would also provide her with negative information about Scientology. I was in need of money at the time, and accepted her offer. Shortly thereafter, we were joined by an Egmont Koch, whom I quickly observed to be the real boss.

6. The basis for my retainer was my supposed experiences in and knowledge about the Church of Scientology. I use the word *supposed* as I and they knew that this was a lie. I have a

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for Berry's use against the Church of Scientology. When I became concerned about my perjury, Berry assured me not to worry, he would take care of it, because any Scientologist who testified otherwise would not be believed because the courts were prejudiced against Scientology.

12. During the course of the deposition, my false testimony included the following assertions. I knew that the statements I made would be used against the Church, and that though they would surely deny them (as the events had never happened), they would be recounted anyway, and it would create negative publicity and sentiment against the Church.

a. I made up a story that I had conspired with attorneys Kendrick Moxon, Timothy Bowles and Laurie Bartilson, as well as with investigator Eugene Ingram, to murder CAN's Executive Director, Cynthia Kissler, and San Francisco attorney Ford Greene, who had represented individuals in legal actions with the Church. The truth of the matter was that no such meeting was ever held and I was never ordered or asked to murder anyone and I completely fabricated the story with the knowing participation of Mr. Berry. I never even met Mr. Moxon until he appeared for a few minutes during one of the sessions of my deposition. I luckily recognized him then only because I had seen his photograph in a media article, so I feigned having met him before to try and bolster my credibility.

b. That I had been a member of the Church of Scientology, and an "operative" conducting illegal or unethical activities on behalf of the Church, since the early 1980's. In fact, I have never even been a member of the Church, much less an employee or "operative" for any Church of Scientology. I forged invoices and similar documents to support my false claim of having taken various Church religious services. Nor have I ever done anything illegal or unethical at the instruction of, on behalf of, or with the knowledge of any member of the Church

of Scientology. To the contrary, I was specifically directed by representatives of the Church that I was not to do anything illegal or unethical while educating the public about CAN and told that, should I do so, they would immediately cease all contact with me.

c. That I was in fear for my life and the lives of my parents, because of my testimony against the Church of Scientology, and believed I required protection by the police. I knew that I would not be harmed by anyone in the Church, no matter how outrageous my lies became, because my contacts with its representatives had demonstrated them to be honest and law abiding. I had also been informed by Berry and others that a litigation tactic successfully employed against the Church was to allege threats or fear for one's life.

13. After representatives of the Church of Scientology International became aware of the planned documentary and my participation in it, they provided documentation of my repeated betrayals and history of lies to Ms. Botros and Koch. However, rather than hastening my dismissal, Ms. Botros asked me about various allegations. I did not have good explanations for them, but as I was interested in not losing the potential income that she had promised me, and she was interested in being able to use my statements, no effort was made to substantiate them.

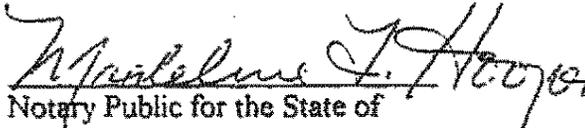
14. Ms. Botros told me that they had spent a long time raising money to do their filming, and that they were intent upon getting their show done no matter what. It was obvious to me that they needed me for their story and did not care if I was lying or not, as long as they were able to complete their story.

15. I accompanied Ms. Botros, the two cameramen and Ottmann around Clearwater. When I was filmed in front of the Church's Fort Harrison Hotel. Ms. Botros told me exactly where to stand, where to point and what to say, although I had no knowledge whatever regarding

false attack on the Church of Scientology.


Garry Scarff
July 5, 1997.

Sworn to and subscribed before
me this 5th day of July, 1997, at
Los Angeles, California.


Notary Public for the State of
California

