

AFFIDAVIT OF YAEL LUSTGARTEN

I, Yael Lustgarten, originally of Venezuela, do hereby declare and state:

1. I am over 21 years old, of sound mind and body, and not under the influence of any drug or other substance that would affect my memory or ability to tell the truth. I have personal knowledge of the facts that I set forth in this Affidavit, and if called as a witness in any proceeding, I could and would competently testify to those facts.

2. I have prepared this Affidavit by choice, not compulsion, as an exercise of my own free will, and without any pressure, coercion, or duress concerning its content or preparation from anyone.

3. I am writing this Affidavit to set some facts straight. Considering 20 years of service, friendship and working with Mr. David Miscavige, the ecclesiastical leader of the Scientology religion, this Affidavit could be just a brief expression of the way I feel about my experiences with him in the time that I knew him, especially when I heard the lies that other people are now spreading about Mr. Miscavige.

4. I am currently not a staff member or employed by any Church of Scientology, directly or indirectly. I ended my volunteer staff relationship with the Church of Scientology in 2004, to pursue other goals in life, both professional and personal.

5. I joined the Sea Organization (the Scientology religious order) in 1986. I worked in Los Angeles until 1989, when I was promoted and relocated to the Golden Era Productions facility in 1989. Golden Era Productions is a division of Church of Scientology International ("CSI"). At Golden Era is where I came into direct contact with Mr. Miscavige.

6. In all the times I have worked with Mr. Miscavige or seen him working with others, I have never known him to be furious, mad, pissed off, much less hit, punch, kick, slap, choke, push, or inflict any form of abuse, (physical or otherwise) the entire time I have known him. I *never* witnessed that, ever. I am shocked that a few people, who I worked with closely for two entire decades, now turn around and instead of getting on with their lives, they spread lies, specifically about David Miscavige. I find it intolerable as I was in the same place they were, in the same meetings and with Mr. Miscavige at the same times, and I did not ever see things that they are claiming they saw or experienced. Their allegations about Mr. Miscavige are lies, pure and simple, and I know that they are made in an attempt to damage Mr. Miscavige's reputation (which by the way is unassailable). Since the allegations are lies, I felt I had to originate and write my OWN experience.

7. As part of the Marketing team, I was involved with nearly every single marketing campaign that emanated from Golden Era Productions from 1989 to 2003.

That is 14 years of constant involvement. My functions involved creating a marketing campaign, or creating a part of the export, or pricing it and producing the literature, or launching it, or briefing staff members across the globe about the campaign, or briefing public parishioners about the campaign across the globe. In some way, during a decade and a half I was involved in anything and everything that emanated from the Church's marketing unit. Due to the fact that such campaigns utilized parishioner's financing and their message was vital to the Scientology dissemination programs, Mr. Miscavige's input was invaluable in terms of coordination as well as on the creative side of things. From my observation, Mr. Miscavige was always doing more than anyone else to coordinate worldwide promotion and marketing actions. I also saw that he always remained informed of multi-media campaign launches across newspapers, television and radio, to say the least – especially during the early 1990's, but extending all the way until I left Golden Era in 2004.

8. I was present at literally hundreds of meetings, adding up to thousands of hours, where Mr. Miscavige was present. He continually acted to keep all activities coordinated. At the meetings where he was present, he went as far as recording and having all the meetings transcribed so staff would understand and coordinate their actions for maximum success – that being expansion and Church recognition. He would have his personal staff stay up until early morning transcribing the meetings, so that by the next morning, when we all came to work, we had Mr. Miscavige's direction in writing and could ourselves coordinate our actions. This was invaluable as it put things in writing that we could refer to during the day and not be required to remember exactly what was said and the guidance provided.

9. Despite Mr. Miscavige's efforts, his creative input, and his countless of hours explaining and referring to material, some staff would just do exactly the reverse to what he would recommend. It was something I myself saw, it was almost like some people *wanted* to contradict him just to upset him.

10. I have attended over 1,000 meetings involving Church marketing. I witnessed one meeting where Jeff Hawkins, a fellow marketing staff member at that time, was presenting a campaign for "Scientology". However, the way he presented the campaign was not the way someone would present a multi million-dollar campaign to executives. He smelled of body odor, he was unshaven, his voice tone was very low and he could hardly be heard. Someone asking for millions of dollars to launch a long-term campaign would never behave like that. Jeff did. Of course his campaign was never approved and it was totally not acceptable. And now, he claims he was "hit " by Mr. Miscavige. I was right there. He wasn't hit by anyone. He was told to wake up, and speak louder and frankly to correct his attitude. He claims he was beaten up and held down. It's all a lie. I was there.

11. I also was present at hundreds of campaigns meetings with Mr. Miscavige present. He would always joke with me. We would laugh about my accent (as I have a heavy Spanish accent); he would always direct me as to what to do to make the campaign better. Usually, he would approve it on the spot. This occurred with a very