

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

CHURCH OF SCIENTOLOGY OF)	
GEORGIA, INC., a Georgia)	
Corporation,)	
Plaintiff,)	CIVIL ACTION FILE
)	
vs.)	NO. 1:10-CV-0082-CAP
)	
CITY OF SANDY SPRINGS, GEORGIA,)	
a Municipal Corporation of the)	
State of Georgia; the CITY)	
COUNCIL of the CITY OF SANDY)	
SPRINGS, GEORGIA; EVA GALAMBOS,)	
Mayor of the City of Sandy)	
Springs, Georgia; and JOHN)	
PAULSON, DIANNE FRIES, WILLIAM)	
COPPEDGE COLLINS, JR., ASHLEY)	
JENKINS, TIBERIO DeJULIO, and)	
KAREN MEINZEN McENERNY,)	
Individually in Their Official)	
Capacities as Members of the)	
CITY COUNCIL of the CITY OF)	
SANDY SPRINGS, GEORGIA,)	
Defendants.)	

- - -

Deposition of DEBORAH QUINN DANOS, taken on behalf
of the Defendants, before Kimberly S. Bennett, RPR,
CRR, CBC, CCP, Certified Court Reporter and Notary
Public, at 3500 Lenox Road, N.E., Suite 760, Atlanta,
Georgia, on the 19th day of May, 2010, commencing at the
hour of 9:48 a.m.

- - -

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Marietta, Georgia 30062
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1 INDEX TO EXAMINATIONS

2 DEBORAH QUINN DANOS PAGE
3 Examination by Ms. Henderson..... 4

4
5
6

7 DEFENDANT'S EXHIBITS

8 EXHIBIT DESCRIPTION PAGE
9 1 Limited Warranty Deed 28
10 2 Property and Boundary Survey 28
11 3 Plans (full size) 52
12 4 Floor Plans 53
13 5 Certificate of Zoning 85
14 6 Parking Evaluation 89
15 7 7/15/09 Letter from J. Walker to W. 92
16 Galloway with attachments
17 8 Academy/Div 6 and Staff Roll Sheets 118
18 9 Events Call-In 118

19
20
21
22
23
24
25

(Defendants' Exhibit No. 3 was retained by Ms.
Henderson.)

1 APPEARANCES OF COUNSEL:

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13 - - -

14 (Pursuant to Article 10.B of the Rules and
15 Regulations of the Board of Court Reporting of the
16 Judicial Council of Georgia, the court reporter
17 disclosure statement is tendered at the end of the
18 transcript.)

19 - - -

20 MS. HENDERSON: This will be the
21 deposition of Deb Danos taken pursuant to Notice
22 and agreement of counsel for all allowable purposes
23 under the Federal Rules of Civil Procedure. Off
24 the record.

25 (A discussion was held off the record.)

1 MS. HENDERSON: All objections except as
2 to form of the question, responsiveness of the
3 answer will be waived until first use of
4 deposition. Is that acceptable?

5 MS. JONES: Yes.

6 MS. HENDERSON: Okay. Would you swear
7 the witness.

8 DEBORAH QUINN DANOS,
9 having been first duly sworn, was examined and testified
10 as follows:

11 EXAMINATION

12 BY MS. HENDERSON:

13 Q Miss Danos, my name is Laurel Henderson. I
14 represent the City of Sandy Springs. I will try to keep
15 my two cases straight. We're doing two at the same time
16 in tandem with two different jurisdiction.

17 A Okay.

18 Q So if I have a momentary lapse, hopefully
19 Andrea will catch me and we'll correct it.

20 MS. JONES: If I'm not momentarily lapsed
21 at the same time.

22 (A discussion was held off the record.)

23 Q (By Ms. Henderson) Have you ever been deposed
24 before?

25 A No.

1 Q Okay. We're going to sit here at the table.
2 I'm going to ask some questions and you will respond to
3 those questions. It's perfectly okay for you to nod
4 your head or shake your head while you're talking.

5 A Okay.

6 Q But the court reporter needs to get a verbal
7 response --

8 A Okay.

9 Q -- from you. And for the same reason that we
10 want to make sure the record is clear, if the answer is
11 "yes" or "no," if you would say "yes" or "no" rather
12 than "mm-hmm," "huh-uh." That's very hard to read on a
13 transcript.

14 A Sure.

15 Q Okay?

16 A Okay.

17 Q If I ask something that is unclear or that you
18 feel you can't answer, please ask me to rephrase and
19 tell me what the problem is, and I'll try to assist you
20 in that.

21 A Okay.

22 Q If at any time you need a break, ask for a
23 break. And we will take breaks periodically throughout
24 the deposition.

25 A Okay.

1 Q If I ask you a question and you understand it,
2 I'm going to assume that you have understood the
3 question unless you tell me otherwise. Is that fair?

4 A Okay.

5 Q All right. And with that, let's begin.

6 A All righty.

7 Q All right. Would you state your full name for
8 the record, please.

9 A Deborah Quinn Danos.

10 Q And what is your address?

11 A 3494 Briarcliff Road, Atlanta, Georgia 30345.

12 Q What is your educational background?

13 A I have a master's degree in music therapy.

14 Q Okay. How long ago was that?

15 A Let's see. '85.

16 Q Did you ever use that music therapy degree?

17 A I did.

18 Q And are you now a full-time employer [sic] of
19 the Scientology Church of Georgia?

20 A Yes. Employee.

21 Q I'm sorry?

22 A Employee, yeah.

23 Q Thank you. How long have you been so
24 employed?

25 A For the better part of, let's see, 20 years.

1 Q That's quite a while.

2 A Yeah.

3 Q What employment history do you have before
4 Scientology or coterminous with Scientology?

5 A I practiced my -- in my field of music therapy
6 for a number of years. Gosh, I haven't gone through
7 this in my head in so long, this exact chronology. But
8 up until the point where I got married. And then we
9 moved to -- from Louisiana I went to Loyola University.

10 And then I got married and we moved to Denver.
11 And while there I did some contract work in my field,
12 opened a practice. And then got pregnant and decided to
13 do a day-care facility. So I ran a day-care which I
14 grew into a private school for a number of years until
15 divorcing, at which point then I took on training and a
16 career shift to become a tax accountant.

17 Q That's quite a change.

18 A It is indeed. But it allowed me the
19 flexibility -- as you can well imagine, being the
20 administrator of a school is quite a full-time, quite a
21 commitment.

22 Q Right.

23 A And as my children were grown out of that
24 facility, it behooved me to find something that was very
25 flexible. So I got into tax and accounting, and then I

1 moved to Atlanta where I opened my own tax and
2 accounting office.

3 Q And what year did you move to Atlanta?

4 A 1999.

5 Q Okay. Are you still doing a tax and
6 accounting?

7 A Mm-hmm. Yeah.

8 Q Where is that office located?

9 A I no longer maintain an office. I was not --
10 during a lot of this time I was employed also by the
11 church.

12 Q Okay.

13 A And so I was employed by the church in Denver
14 for 12 years --

15 Q Okay.

16 A -- during that time. And when I moved to
17 Atlanta, I was not employed by the church for about five
18 years, and then in 2005 I rejoined staff here locally.

19 Q Okay.

20 A Did I finish all my thoughts? Was I in the
21 middle of something?

22 Q That seemed pretty complete from my
23 perspective.

24 A Okay.

25 Q Let me back you up again and ask how you came

1 to Scientology.

2 A Gosh. Right -- recently after moving to
3 Colorado and after getting married and moving to
4 Colorado I was doing laundry in a laundromat, found a
5 flyer that was a person -- what they called the
6 personality test. It's actually the Oxford Capacity
7 Analysis. It's a little questionnaire that is typically
8 given to people so that you can really satisfy some
9 questions about yourself.

10 So the line on it says, "Curious about
11 yourself?" And so you pick it up and you answer some
12 questions and you mail it in. And then it gets scored
13 and they call you, and then you come in and you look at
14 the results of that test, and then they show you where
15 you have things that plunge and you talk about those
16 areas of your life, and then it's explained to you that
17 Dianetics and Scientology offers solutions to improving
18 life's condition.

19 And I bought the Dianetics book and read it.
20 I thought it had a lot of valuable information in it,
21 and I went very quickly into the church.

22 Q And from the time when you first picked up the
23 pamphlet until the time when you were actually employed
24 by Scientology, how long a time period was that?

25 A Less than a year.

1 Q Okay. And during that year what activities
2 were you involved in with Scientology?

3 A Study. I bought a course called
4 "Self-Analysis." And it was a -- it's sort of the
5 primer for Scientology counseling. And you study with a
6 twin. And you help each other on some rudimentary kind
7 of counseling lists. And it was very exciting, and I
8 saw the young man that I was studying with change
9 quickly in a number of very positive ways. And I just
10 thought: There is really something very valuable here.
11 So didn't take me long to be sold on it.

12 Q Okay. And when you first started working for
13 the church, was that in a full-time or part-time basis?

14 A Part-time.

15 Q Okay. At what point did you become a
16 full-time employee?

17 A Gosh, I would be hard-pressed to say an exact
18 time. I came on really as a volunteer and then the
19 hours that I was spending at the church grew gradually
20 over time. My seeing the need for more help there and
21 at some point in time when I was there 40 hours a week
22 someone said, you know, You're here 40 hours a week; you
23 should just sign up and get the benefits of being a
24 staff member, which is, you know, some pay and free
25 training and counseling service. That's your exchange.

1 Q So you indicated that in 2005 you became
2 affiliated with Scientology Church of Georgia?

3 A Correct.

4 Q Was 2005 when you moved to Georgia?

5 A No.

6 Q When did you move to Georgia?

7 A 1999.

8 Q Okay. And did you have any connection with
9 the Scientology Church between 1999 and 2005?

10 A Sure. Yeah. I went to events.

11 Q Okay.

12 A And did some course work at the -- as I found
13 the time to do so.

14 Q All right. What are your current duties with
15 the Scientology Church of Georgia? First of all, what
16 is your title?

17 A My title is director of special affairs, which
18 is essentially a community liaison role.

19 Q Okay. And specifically what are your duties?

20 A Specifically I oversee the social betterment
21 programs, the community programs, and I am the media
22 contact person. So public relations. I am the legal
23 liaison. And that's essentially everything.

24 Q Those are very diverse areas.

25 A They are indeed. Essentially I handle

1 everything that goes on outside of the church.

2 Q Okay.

3 A I mean, that's kind of how it's designated.

4 Q You're the face of the church to the outside
5 world in the Georgia community?

6 A Essentially, yes.

7 Q Okay. All right. What does it take for a
8 person to be considered a Scientologist?

9 A Really only personal choice. I'm happy you
10 asked that question, in fact, because it does get to be
11 a problem of semantics. But a person could read the
12 Dianetics book and decide I'm a Scientologist, this is
13 exactly what I've been looking for and never even enter
14 a Church of Scientology and yet consider themselves now
15 a practicing Scientologist.

16 And most of our courses can be done online or
17 by extension course. We have people in prisons who have
18 done a lot of study, have never set foot in a church but
19 consider themselves Scientologists. So really it's a
20 personal choice.

21 Q So it's a self-identification that people make
22 at some point and it may vary from person-to-person as
23 to what that means?

24 A Absolutely, mm-hmm.

25 Q Okay. Are there rites or rituals for

1 officially becoming part of a Scientology organization?

2 A No, not really. Typically one would join --
3 once you decided that you are a Scientologist and you
4 have the availability to come into a church on a regular
5 basis and attend, like, any of our major events and you
6 kind of make yourself available to the church and you
7 really are in good communion with the group, then you
8 would typically join an association called the
9 International Association of Scientologists. But that
10 would be any person who considers themselves a
11 Scientologist that wants to be a part of that group
12 worldwide and it's an international trust.

13 Q And how would one go about joining that trust?

14 A There are two ways. One could simply
15 originate, wanting to join either online or through the
16 church and say, I want to be a member. Or when you
17 are -- when you sign up for your very first service in
18 the church, your very first either counseling or
19 education, you're given a free six-month membership
20 which entitles you to some discounts and some mailings
21 and some access to some information, you know, on what's
22 going on in our community campaigns worldwide.

23 Q Okay. Is there an annual fee for belonging to
24 the International Association of Scientologists?

25 A There is not. There is not. One would be

1 asked to renew at the end of their, say, six-month
2 membership, one would be asked to purchase an annual
3 membership. It's totally up to you if you want to do
4 that or not.

5 Q Okay.

6 A If you do, you maintain the privileges of that
7 membership which is, of course, discounted rates on
8 books and services and the magazine and all the stuff.
9 And if you don't, fine.

10 Q And if you don't, you can still obtain those
11 materials; you just don't obtain them at a discounted
12 price?

13 A Correct.

14 Q All right. The pleadings indicate that the
15 Church of Scientology of Georgia has 600 members of whom
16 100 are active.

17 A Mm-hmm.

18 Q So let's talk a little bit about membership,
19 'cause I understand we have a semantic problem over
20 membership as well. And I'm trying to understand how
21 this works.

22 A Yeah.

23 Q So if you would tell me how one becomes --
24 I've asked you generally how one becomes a
25 Scientologist. Is there a formal process for becoming a

1 member?

2 A No.

3 Q Okay. And is there any official membership
4 role?

5 A No. Other than the IAS. Other than the
6 International Association of Scientologists, that's the
7 only official membership role that the church has.

8 Q And that official membership role would be
9 based upon dues-paying people?

10 A Yeah. And it really has little to do with
11 whether or not someone attends church on any regular
12 basis or what church they attend.

13 Q I think I just broke my own rule. I asked
14 you, "that would be dues-paying people" and you nodded
15 your head, but you didn't give me an affirmative answer.

16 A Sorry. Yes.

17 Q Thank you. We just need to clean that up.

18 A Sure.

19 Q So in the Georgia church and can I -- is it
20 permissible for me in this deposition to use "Georgia
21 church" and "local church" synonymously to mean the
22 Church of Scientology of Georgia, Inc. that you are
23 affiliated with?

24 A Yes.

25 Q Okay. So in the local church is there

1 anything similar to a concept of membership?

2 A I don't think so. I mean, I look on it --
3 this is just me telling you my opinion. I look on it
4 like Christians. Is there a membership for a Christian?
5 No. It's a personal belief in a philosophy that you
6 follow.

7 You can take that personal belief and
8 philosophy and walk into any Christian church pretty
9 much of your choosing and participate. And you may or
10 may not be on anybody's role somewhere. And it's
11 similar with Scientologists.

12 Now, clearly if you live in a certain
13 vicinity, you would participate in services of your
14 local organization probably. However, we are somewhat
15 hierarchical in nature with regard to the delivery of
16 our service and our education and counseling whereby as
17 you progress through the education and counseling
18 process, there gets to be a point where the Church of
19 Scientology of Georgia can no longer deliver to you
20 because you've already studied and been processed
21 through the levels that we can deliver.

22 Therefore, you would commence your -- the
23 remainder of your education and counseling at an upper
24 level organization, which would be in this case
25 Clearwater or Los Angeles or any number of places in

1 Europe or around the world.

2 So you could live in Atlanta and yet not
3 necessarily be, quote-unquote, a member of the Atlanta
4 church but still be a member of Scientology.

5 Q All right. Let's say that someone has been in
6 the local Georgia church and has progressed through the
7 training and programs that are offered in that church.

8 A Mm-hmm.

9 Q And they're now at a point where they have to
10 either through correspondence or e-mail or something get
11 additional training elsewhere. They would still be free
12 to attend, for instance, Sunday services or other
13 functions at the Atlanta church; is that correct?

14 A That is correct.

15 Q Or would they not attend those anymore?

16 A They could. They could absolutely attend
17 Sunday service if they chose to. But more typically
18 they would attend any one of our six major events that
19 we hold through the year that are international events.
20 And that's -- those events are where we like to pull in,
21 you know, as many of our fellow Scientologists from our
22 local area as possible so that they can get the news
23 from around the world.

24 Q And what are those six major events?

25 A Let's see if I can remember them. We have

1 L.R.H.'s birthday.

2 Q I'm sorry?

3 A L. Ron Hubbard's birthday. It's called the
4 birthday event. We have the Dianetics anniversary
5 event. We have Auditors day. We have a New Year's
6 event. And how many is that?

7 MS. JONES: Four. That's four.

8 THE WITNESS: Oh, my gosh. Let's see.

9 Typically we have an event that's put on by what
10 can we the Flag Land Base which is the upper level
11 Clearwater facility. They come and make a
12 presentation to those in our area who are aspiring
13 to go up and also with the American Saint Hill
14 Organization which is in Los Angeles which is also
15 an upper level educational organization.

16 Q (By Ms. Henderson) And that's the same sort of
17 thing, people from Los Angeles would come here and put
18 on a presentation for people who might aspire to move in
19 that direction?

20 A Correct.

21 Q Those would be the six major events that are
22 held. Are they scattered throughout the year or are
23 they clustered at different times?

24 A They're pretty scattered.

25 Q So if we get back to the pleadings with 600

1 members of which 100 are active, tell me how that number
2 was derived.

3 A The 600 comes from the accumulation of names
4 of people who live in our area who are Scientologists
5 who have been at some point in the last, I don't know,
6 five, ten years involved in Scientology service either
7 locally or have moved on to an upper level organization.

8 Q And let me stop you at that point. When you
9 say "involved in Scientology service," my understanding
10 from what you said -- and correct me if I'm wrong -- is
11 that people start out learning and learning leads to
12 serving in some capacity; is that correct?

13 A Well, of course, absolutely. But when I say
14 "service" I mean Sunday services, courses, counseling,
15 that kind of thing.

16 Q So of the 600 names, they have taken course
17 work or had counseling or attended Sunday services or
18 have some sort of connection?

19 A Some sort of ongoing affiliation.

20 Q All right. And is there any minimal number of
21 contacts that someone would have to have to be
22 considered among that 600?

23 A No. It's completely arbitrary.

24 Q So that would include people who may have come
25 in the door three years ago and not been back since?

1 A It could. It could.

2 Q I mean theoretically.

3 A It could.

4 Q Or it could be people who have been
5 consistently coming for five years or someone who has
6 just started last week?

7 A Exactly.

8 Q Okay. All right. And then when you say 100
9 active, tell me a little bit more about what that means.

10 A I mean 100 of people who have recently -- and
11 I say recently, like, say, within the last year -- are
12 participating in services at the organization. So that
13 would be course work, extension courses, or courses in
14 the Academy or counseling or in some way involved in our
15 community service programs, you know, people who are
16 actively doing something.

17 Q Okay. And so over the past year or so there
18 are about 100 names that are accounted for as having
19 participated in some function of the Georgia church?

20 A Correct.

21 Q Okay. And is that number of 100 over the last
22 year fairly constant or different from the preceding
23 year?

24 A It seems to be fairly constant. I mean, it
25 varies a little between 80 and 100. But it's in that

1 range almost -- well, since I've been here since 2005
2 that's what I've observed.

3 Q Okay. So it's been pretty stable since 2005,
4 a little variation but the range has been pretty much
5 the same?

6 A Right.

7 Q Are the courses that are offered and the
8 counseling that's offered, are those offered to adults?

9 A Yeah.

10 Q Are there other courses or counseling that's
11 offered to children?

12 A Yes.

13 Q What percentage of the Georgia church of
14 those, say, 100 active members from your pleadings of
15 people who have been involved for the last year, how
16 many of those 100 are children as opposed to adults? Do
17 you have any idea?

18 A Gosh, I'm just sort of scanning faces in my
19 mind right now. Maybe 20, maybe 15.

20 Q Okay. What age range would those children
21 fall within?

22 A 8 probably to 18.

23 Q Okay. I'm assuming that with the possible
24 exception of older teenagers, if children are coming and
25 participating they're coming because their parents are

1 participating?

2 A Yeah.

3 Q For the most part.

4 A Yes.

5 Q The Church of Scientology International, where
6 is that based?

7 A Los Angeles.

8 Q And how is it organized to the best of your
9 understanding?

10 A I don't know that I can actually answer that
11 question.

12 Q All right. Who controls that organization?

13 A David Miscavige is the chairman of the board
14 of the Religious Technology Center. Now, there is an
15 affiliation between the RTC and the Church of
16 Scientology International, but I am not 100 percent
17 aware of the corporate structure of those groups.

18 I can tell you that David Miscavige is the
19 ecclesiastic leader of the church and a good bit of the
20 church direction comes from him.

21 Q You mentioned the initials RTC. Tell me again
22 what that stands for.

23 A Religious Technology Center.

24 Q And you're saying that's different than CSI?

25 A It is different than CSI, yes. The RTC is the

1 holder of the works of L. Ron Hubbard.

2 Q What is the Georgia church's relation to CSI,
3 if any?

4 A Well, essentially we are hierarchical in
5 structure. And CSI is the body -- really the governing
6 body of, you know, ecclesiastically speaking, of the
7 churches around the world.

8 Q All right. Is there any intermediate level
9 going from CSI to the Georgia church? Are there
10 churches that would be in the middle of that hierarchy?

11 A There is. There's a Continental -- what's
12 called a Continental Liaison Organization, one on the
13 east coast and one on the west coast. And that is the
14 intermediary governing body.

15 Q I assume because we're in Atlanta that you
16 would go through the east coast Continental Liaison.
17 Where is that located?

18 A New York.

19 Q Okay. And is that the next step down under
20 CSI?

21 A Yes.

22 Q Okay. And then is there a further step down
23 from the Continental Liaison body to the Georgia church?

24 A No.

25 Q You mentioned the church in Clearwater. How

1 does that relate to this hierarchical structure?

2 A It doesn't really. It's its own organization.

3 Q Okay.

4 A And I'm really not familiar with exactly what
5 their -- how they relate to the overall group of
6 organizations. I know that they're an independent body
7 that -- they answer up to somebody. I just don't
8 know -- I imagine it's CSI. But that's purely
9 speculation on my part.

10 Q If someone has completed all the programs and
11 offerings that are offered in the Georgia church, then
12 who would refer them on and how would they be referred
13 if, let's say, they wanted to go further?

14 A The registrar would be a potential referral
15 point. But typically it's the events where the upper
16 organizations come in and they gather names and make
17 contacts of people who are nearing that point.

18 And once they've made that contact, then they
19 are in pretty good regular contact with people who are
20 ready to move on.

21 Q Okay.

22 A So it's more like it's a reach down from the
23 other organization kind of a thing rather than our
24 referring up.

25 Q Okay. And you mentioned the registrar. Is

1 there a registrar with the Georgia church?

2 A There is a registrar function that is actually
3 held by the executive director.

4 Q And what is the registrar function? What does
5 that do?

6 A Simply to sign the person up for their service
7 and print the invoice, get them started.

8 Q Okay. So if someone were to want to -- if
9 someone were to walk in the door of the Georgia
10 Scientology Church and say, "I'm interested in learning
11 more," the registrar would be the person that they would
12 go to who would say, "Here's where you start"?

13 A It could be the registrar or it could be
14 someone in our Division 6 area, which is our public
15 division.

16 Q Okay.

17 A Any number of people could show that person
18 more information.

19 Q And if they wanted to actually engage in
20 course work, they would sign up by the course; is that
21 correct?

22 A Yes.

23 Q And they would pay a fee for that course?

24 A Yes.

25 Q And is that a set fee per course --

1 A Mm-hmm.

2 Q -- that's taken?

3 A Yes.

4 Q And then if they wanted to progress to another
5 course, they would sign up for that course and take that
6 fee as well?

7 A That's correct.

8 Q What about individual counseling. How does
9 that fit in to the course work, or does it?

10 A It doesn't necessarily. They are two separate
11 functions.

12 Q Okay.

13 A But if someone were interested in signing up
14 for counseling, it would be done in a similar manner.
15 And then they would be appointmented with their
16 counselor.

17 Q Okay.

18 A On an individual basis.

19 Q And if someone wanted to sign up for
20 counseling, would that be done for, say, a certain block
21 of meetings, a certain number of meetings?

22 A Yes.

23 Q And same on a fee basis for that function?

24 A That's correct.

25 Q All right. When was the Georgia church first

1 formed?

2 A To the best of my recollection, having looked
3 at the documents, it was -- I think there was a mission
4 established here in the '70s. And then it was made into
5 a church in the '80s, mid '80s sometime. I don't recall
6 exactly what year, not having lived here at the time.

7 Q Okay. And do you know where the mission first
8 operated?

9 A I don't.

10 Q When the Georgia church became a church in the
11 '80s, do you know where they were first located?

12 A I believe they are on Piedmont Road at that
13 time.

14 Q Do you know about what area on Piedmont Road?

15 A Somewhere in, like, Lindbergh, in that
16 vicinity. I don't think the building's there any
17 longer.

18 Q All right. What does it take to move from
19 mission status to church status; do you know that?

20 A I don't know specifically. Generally I can
21 say that there are certain prerequisites and
22 requirements that must be met. And when an organization
23 aspires to do so, they apply and show that they've met
24 the requirements.

25 Q Okay. And once the church became a church,

1 has it remained at the same status, or has the status of
2 the Georgia church changed from sometime in the '80s
3 until the present?

4 A No. It's unchanged.

5 Q Okay. All right. And then did the church
6 when it left the Piedmont Road site, where was its next
7 physical location?

8 A I believe it next moved to Mount Vernon Road
9 in Dunwoody.

10 Q All right. And do you know approximately when
11 that occurred?

12 A 2000, something like that. 2001, somewhere in
13 that range I recall.

14 Q Then from Mount Vernon Road did it move to its
15 current site in Dunwoody?

16 A Yes.

17 Q And what year did that take place?

18 A 2007.

19 Q What is that location?

20 A That is 4480 North Shallowford Road, also
21 Dunwoody.

22 (Defendants' Exhibit Nos. 1 & 2 were marked
23 for identification.)

24 Q (By Ms. Henderson) Miss Danos, I've handed you
25 two documents. The first has been marked as Defendants'

1 Exhibit 1, and it's a copy of a warranty deed that we
2 received through -- actually, it was attached to your
3 church's application. Can you identify this document
4 for me?

5 A It is the limited warranty deed of the
6 property on 5395 Roswell Road.

7 Q Okay. And that is the property that this
8 lawsuit is concerning; is that correct?

9 A That's correct.

10 Q That is the location which the Georgia
11 Scientology Church wishes to move from its location in
12 Dunwoody to Sandy Springs?

13 A That's correct.

14 Q Okay. And this warranty deed indicates that
15 it was filed in 2005; is that correct?

16 A Yes.

17 Q Were you involved in any way in the selection
18 of the Roswell Road site?

19 A No.

20 Q Do you know who was involved in the selection
21 of that site?

22 A I don't know who -- I know that the existing
23 executive director of the church at that time was
24 involved. Beyond that, I don't know. There may and
25 probably were others. But I don't know who they were.

1 Q Given that the church bought a fairly sizeable
2 building in 2005 for church use, why did the church end
3 up in a smaller building in Dunwoody in 2007 as opposed
4 to moving into this building that it had already
5 purchased?

6 A We sold our property that we were housed in on
7 Mount Vernon.

8 Q Okay.

9 A Anticipating relocating in the near future
10 into the Roswell Road building.

11 Q Okay.

12 A And so we did a sale with a lease-back and we
13 were unable to get into the building. So we had to move
14 to temporary quarters.

15 Q All right. You say a sale with a lease-back.
16 Who was the property leased back to?

17 A Well, we sold the building and then we leased
18 it back from the new owner in Mount Vernon.

19 Q On Mount Vernon?

20 A Right.

21 Q And that was in 2005 or thereabouts?

22 A That was in 2006.

23 Q 2006. Okay.

24 (Cell phone ringing.)

25 A Sorry.

1 Q That's okay. Mine did the same thing.

2 A Turn it down.

3 MR. DILLARD: That will get you locked up
4 if you're in court.

5 (A discussion was held off the record.)

6 Q (By Ms. Henderson) Let's go back on. So the
7 Georgia Scientology Church sold the Mount Vernon
8 property, leased it back. Did it lease it back for a
9 certain term of years?

10 A Yes.

11 Q How long?

12 A One year.

13 Q One year. And then at that point we're at
14 2008?

15 A '7.

16 Q '7. All right. We're at 2007. And then it's
17 been two years since the Sandy Springs property was
18 purchased. Is that property vacant and available at
19 that point?

20 A It was vacant, yes.

21 Q And why did the Georgia church choose not to
22 try to move toward use of the Sandy Springs property at
23 that time?

24 A At that time we were involved in repaying a
25 loan that was made by CSI to purchase the building.

1 Q Okay.

2 A Fundraising to repay that loan and to further
3 handle the renovations that were needed on the building.

4 Q Okay. So the Roswell Road building was
5 purchased with money from CSI?

6 A Originally.

7 Q Which then had to be repaid?

8 A Correct.

9 Q And has that purchase price been repaid in its
10 entirety?

11 A Yes, it has.

12 Q So the Georgia church now owns the Roswell
13 Road building free and clear?

14 A That's correct.

15 Q Okay. Did CSI also advance money for
16 renovation of the Roswell Road building?

17 A No.

18 Q How did the Georgia church then move to the
19 Shallowford Road location? How did that happen? Or why
20 did that happen?

21 A Well, we came to the end of our lease-back
22 period and we were required to relocate.

23 Q All right. And were you involved in the
24 selection of the Shallowford Road location?

25 A Yes, I was.

1 Q Tell me what factors went into that decision
2 to locate on Shallowford Road.

3 A Well, ultimately the decision was not mine. I
4 was involved in it. There were three locations.
5 Typically how the process goes is that locally you will
6 locate two or three potential sites and then send up a
7 checklist of information, a very thorough checklist of
8 information, including photos, et cetera, et cetera, to
9 the landlord's office at CSI.

10 Q Okay.

11 A And then they look over the various facilities
12 and they direct you.

13 Q So if a local church, any local church wants
14 to change locations, move into a new building, that
15 structure is going to have to be approved by CSI before
16 it can be used?

17 A That's correct.

18 Q Okay. And at the time when the Georgia church
19 moved into the Shallowford Road building, was it
20 operating in about its current level of, to use a loose
21 term, membership as it is now in that 80 to 100 people
22 per year range?

23 A Yes.

24 Q And did CSI consider that that Shallowford
25 Road facility was adequate in 2007 for the Georgia

1 church's purpose?

2 A I don't know exactly what CSI thought.

3 Q And I understand that. I'm asking for your

4 understanding to the extent that you have one.

5 A I can give you my -- exactly that, my

6 viewpoint.

7 Q Okay.

8 A It was to be very temporary.

9 Q Okay.

10 A At the time. It was within a short distance

11 of our prior location, which was thought to be a

12 priority issue. It was a relative easy move, which is

13 also a consideration. It was easy to find from the

14 highway.

15 Q Mm-hmm.

16 A And was sufficient and somewhat larger than

17 our earlier building. So it was a compromise.

18 Q Okay. Is the Shallowford location owned by

19 Georgia Scientology or it leased?

20 A No. It's a leased space.

21 Q And is there a date when that lease runs out?

22 A We are actually on a month-to-month with a

23 60-day notice requirement.

24 Q Has the lease been on a month-to-month the

25 entire time, or was it initially for a term?

1 A We had a six-month term.

2 Q Okay. All right. Is it the plan of Georgia
3 Scientology to stay in the Dunwoody facility until it
4 can occupy the Sandy Springs facility?

5 A I don't know.

6 Q Let me ask it another way. Has there -- do
7 you know of any estimates for how long, once the zoning
8 issues are resolved, it would take to remodel the
9 existing building on Roswell Road in accordance with
10 Scientology's plans?

11 A I have heard that it could be done in three
12 months, the renovation. And then so that's pretty
13 quick. But other churches have been handled in this
14 period of time and what they typically do is put three
15 shifts and they work around the clock and just get it
16 done.

17 Q Has there been any discussion among people at
18 the Georgia Scientology Church of a second interim
19 location that's larger than Dunwoody while they're
20 waiting for Sandy Springs to be ready?

21 A There has been some discussion about the
22 possibility of relocating, but mainly due to the
23 building we occupy having changed owners. And the owner
24 may want to occupy. So we may be forced to move.

25 Q Okay.

1 A But that is in the air.

2 Q Okay.

3 A And, you know, we would rather not have to
4 move and move and move.

5 Q Understandably so. At the current time would
6 you describe for me -- we're going to work on describing
7 the Dunwoody facility.

8 A Okay.

9 Q I understand that that building is in an
10 office park; is that correct?

11 A Correct.

12 Q And how large is the space square footage wise
13 that the Dunwoody facility currently occupies?

14 A Approximately 11,000 square feet.

15 Q How much space is available for classes in
16 that facility at the present time?

17 A Gosh, square footage wise or percentage wise?

18 Q How about number of courses. How many courses
19 can be offered at once in the Dunwoody facility?

20 A Well, that --

21 Q As it's set up. Is that easier?

22 A That doesn't help.

23 Q That doesn't help.

24 A Because what we have at the Dunwoody facility
25 is one large course room that has a temporary dividing

1 wall in it and another alcove. So it's a bit of a
2 makeshift into three separate areas -- four, actually.

3 Q And the four areas that that classroom is
4 divided into, does that account for the group portion of
5 the class meeting as well as the individual meeting
6 portions?

7 A It accounts for only on the group study.
8 Yeah. The individual -- we have an area that is divided
9 off to handle the one-on-one activity.

10 Q Okay. And is there an area that's also
11 available for counseling activity in the Dunwoody
12 facility?

13 A Yes.

14 Q And how large, how many offices are available
15 for counseling in the Dunwoody facility?

16 A Three.

17 Q So getting back to my question, which I don't
18 mean to be difficult, but we're still trying to figure
19 how to talk to one another.

20 How many courses can the Dunwoody facility
21 accommodate operating, say, at 9:00 a.m. on a Monday
22 morning?

23 A I don't know that I can give you a "how many."
24 I can tell you that with the exception of courses that
25 require some unusual physical environment, which we are

1 prohibitive from delivering at this point, most courses
2 can be delivered in that course room. But it is
3 completely nonstandard for us to be having the kinds of
4 people studying, the kinds of courses that they study
5 all in one room as they are.

6 Q Okay. At the present time how many people
7 work at the Dunwoody facility?

8 A There are, oh, I would say probably 20. And
9 I'd have to count and I've not counted recently. But
10 we've got a number of part-time people who if I don't
11 see them in a while, I don't know if they're still there
12 or not. But approximately 20.

13 Q Does the 20 include both day people and night
14 and weekend people?

15 A Yes.

16 Q Is the Dunwoody facility at the present time
17 able to accommodate not in the desired manner but able
18 to accommodate the number of people who want to do
19 course work there?

20 A My response to that would be a reserved yes.
21 However, it's important to note that when you cannot
22 deliver in the ideal fashion, people don't come. So,
23 yes, but it's a little bit of a self-fulfilling
24 prophesy, you know what I mean.

25 Q Okay. I think I understand that. Let me ask

1 it another way. Is there a waiting list, do people have
2 to wait to get in to courses that they would like to
3 take?

4 A Not courses. On the auditing, on the
5 counseling side, yes.

6 Q And how long a wait is there for people who
7 want to participate in auditing or counseling?

8 A It varies greatly depending on schedule and
9 availability.

10 Q Is the Dunwoody facility presently on a bus
11 line?

12 A Yes, there is. There is a bus line out there.

13 Q Is there any street parking on Shallowford
14 Road?

15 A No.

16 Q In the office park is the Dunwoody -- is
17 parking for the Dunwoody facility limited to a
18 particular portion of the parking lot, or are people
19 coming to the Scientology Church able to park anywhere
20 in that office park?

21 A The staff have been asked to park in the rear,
22 in the back parking. But the parishioners I think can
23 park pretty much anywhere except for a designated area
24 in front of the assistance home. There's a elderly -- I
25 don't know what you call it -- retirement home, assisted

1 living facility -- that's the term -- behind the office
2 building whose parking is reserved.

3 Q Okay. I may have already asked you this. If
4 I did, I apologize. I don't mean to repeat myself.

5 My assumption from your testimony is that the
6 Dunwoody facility was always intended to be a temporary
7 facility until you could move into a permanent place.

8 Is that correct?

9 A That's correct.

10 Q And I need for you to confirm for me. Some of
11 this I already know, but I need for you to confirm it.
12 That the Georgia Scientology Church with which you are
13 affiliated is the only Scientology facility in the state
14 of Georgia?

15 A That's correct.

16 Q Okay. Are there any plans to your knowledge
17 to add a second Scientology facility in the state of
18 Georgia?

19 A There are no plans per se. Clearly we would
20 love to have that happen. But that's the future.

21 Q Okay. How many courses are presently offered
22 at the Dunwoody facility?

23 A I can't answer that question because -- there
24 are many. I just don't know them all. It's not my area
25 of expertise.

1 Q Let me back you up. Are the Scientology
2 courses designed to be taken in a progression, or can
3 people pick and choose and say, This interests me and
4 this interests me and I'll take one of these and one of
5 these and one of those?

6 A There are two main divisions with respect to
7 courses. There's a public division and there's what we
8 call the Academy. In the public division one is free to
9 pick and choose from the menu, whatever interests you.

10 Q Okay.

11 A And there are many. Once you get into the
12 Academy, which is a little bit more streamlined, more
13 toward the dedicated Scientologist curriculum, then it
14 tends to be a prescribed pattern. But there is some --
15 there may be, for example, at your next level one of
16 three or four choices that you could make.

17 Q Okay.

18 A It wouldn't necessarily be solely decided upon
19 by you. You would receive some help and guidance by a
20 staff member.

21 Q Okay. And do you know overall -- and I
22 understand this isn't your area, so I am asking you to
23 give me your best information. And to the extent it's
24 an estimate, you may say that it's an estimate.

25 But do you know how many courses are currently

1 offered that are available in the public division to
2 people who are interested in learning about Scientology?

3 A Gosh, I just have no idea. I could pick a
4 number, but it would be wildly speculative. Here's why:
5 In our -- just in our volunteer ministers area, it's a
6 book that's divided into chapters. Each chapter has its
7 own mini-course that one could sign up for. So just in
8 that one book, one could take any one of, say, 20
9 different little courses.

10 Q Okay.

11 A That would be a matter of hours, really. And
12 then there are just numbers of other places. And as I'm
13 not a Division 6 specialist, I just don't -- I couldn't
14 count. I just don't have any idea.

15 Q Okay. Have you yourself been through the
16 Academy?

17 A I am currently studying in the Academy.

18 Q Is there a prescribed number of courses that
19 have to be completed in the Academy? First of all, is
20 there some completion point in the Academy?

21 A It depends upon your course of study. So you
22 could embark upon a course of study that teaches you
23 really about the theology of Scientology and about
24 yourself as a spiritual being as Hubbard researched it.

25 Q Okay.

1 A Which is a general sort of education about
2 yourself and your church. Or you could embark upon a
3 course of study that teaches you how to be a counselor,
4 which is really a good idea for everybody to have that
5 information. But if you are studying to be that
6 counselor, which we call an Auditor, there is a very
7 definitely defined sequence of courses and there is an
8 end point which can be extended depending upon if you
9 want to go to an upper level church and, you know,
10 proceed further, you can do that.

11 But there is an end at our church for that
12 course of study and you get a certain certificate at the
13 completion of that.

14 Q And if you want to be an Auditor, you're going
15 to have to hold that certificate in order to act as an
16 Auditor --

17 A That is correct.

18 Q -- in the Scientology Church?

19 A Yes.

20 Q Okay. What about people who are teaching non-
21 Auditor-type courses, do they also need to possess a
22 certificate to teach those courses?

23 A Yes.

24 Q So there would presumably be a course of study
25 leading to whatever kind of certificate for whatever

1 kind of course they want to teach?

2 A That's correct.

3 Q And some people may hold more than one type of
4 certificate?

5 A That is correct.

6 Q Okay. Does your 20 staff numbers include
7 volunteers or is that just paid staff members?

8 A That is officially paid staff members.

9 Q And how many additional volunteers does the
10 Georgia Scientology Church utilize on, say, on a weekly
11 basis?

12 A We probably have 10 or 12 volunteers who will
13 come in on a weekly basis, but they vary widely.

14 Q What kinds of activities would those
15 volunteers be allowed to do?

16 A They would help typically on our social
17 betterment campaigns, drug-free world, youth for human
18 rights, the way to happiness, volunteer ministers, or
19 they could come in and participate in any number of
20 projects that we have ongoing that are going to prepare
21 us to move into an ideal org situation. One of which is
22 getting our student and parishioner files in order.

23 Q Does the Scientology Church have ministers?

24 A Yes.

25 Q What is the function of the ministers?

1 A Well, the minister would have many functions
2 and some are specialized. For instance, I'm a minister.
3 I'm a minister in a general capacity in that I can
4 perform marriages and funerals and naming ceremonies and
5 hold an executive office in the church, which is a
6 requirement to hold an executive office.

7 And then you have ministers that are
8 specialized in that our counselors, our Auditors are
9 ministers of the church. And then there are varying
10 educational requirements and various certificates that
11 are available within that realm.

12 Q How many ministers are associated with Georgia
13 Scientology?

14 A Well, let's see. I can tell you how many are
15 on staff. Beyond that, I just have no idea.

16 Q That's a better question. How many are on
17 staff?

18 A Currently on staff -- let me make a quick
19 count here. Seven, I believe, roughly. This might not
20 be exact, but I believe seven are ministers.

21 Q And does Georgia Scientology hold Sunday
22 services at the present time?

23 A Yes, we do.

24 Q What is the average attendance at a Sunday
25 service?

1 A I can only tell you from my personal
2 observation which has not been recent. But the last
3 time I was in the Sunday service or looked in on the
4 Sunday service there were eight to ten people there.

5 Q Okay. And how long ago was that?

6 A Probably six months ago.

7 Q How long does that Sunday service last?

8 A It's an hour.

9 Q Okay. Does Georgia Scientology offer course
10 work and auditing at the same time as the Sunday service
11 is happening?

12 A They could. It could. But typically you will
13 have people who are welcome to leave the course room and
14 attend the Sunday service. So sometimes everyone in the
15 course room goes and sometimes only two or three people
16 will go. If you are in a counseling session, then there
17 is no interruption.

18 Q Okay.

19 A So you could conceivably be appointed to
20 counseling while Sunday service is going on.

21 Q How long do counseling appointments last?

22 A They vary greatly from individual to
23 individual. So the length of time is a judgment call
24 essentially on the part of the minister.

25 Q Is there a range that you can give me as to an

1 average range?

2 A Anywhere from 15 minutes to three or four
3 hours.

4 Q Okay. Well, that's a range. So on any given
5 Sunday there will be a Sunday service of approximately
6 an hour's duration?

7 A Mm-hmm.

8 Q There will be training programs going on,
9 participants of which may or may not leave to attend the
10 Sunday service?

11 A Mm-hmm.

12 Q And there may be auditing going on at the same
13 time; is that correct?

14 A There may be.

15 Q May be. Okay. Give me the hours during which
16 course work is offered at Georgia Scientology.

17 A Weekdays course starts at 9:30 and carries on
18 until 12:00 o'clock. Picks up again at 1:00. Breaks at
19 3:15. There's another session from 4:00 to 6:00 -- I
20 mean, yeah, 4:00 to 6:00. Then dinner. And then the
21 evening session is 7:00 to 9:30 p.m. On the weekends
22 it's 9:00 to noon. 1:00 to 3:45. 4:00 o'clock to 6:00
23 o'clock. And then the church closes at 6:00.

24 Q Okay. And on a weekday the 9:30 to 12:00
25 block, is that one course or does one course stretch

1 longer with those breaks that you gave?

2 A From 9:30 to 12:00?

3 Q Mm-hmm.

4 A It's one study period.

5 Q Okay.

6 A Yeah.

7 Q So if someone were to start at 9:30 and then
8 they come back at 1:00 and start again and go to 3:15,
9 they're probably taking more than one course?

10 A No. Not necessarily. How it works is that
11 one signs up for a course and you are given what's
12 called a check sheet. And the check sheet has on it the
13 list of the materials and items that you will study for
14 that course of study. Or the book or whatever. And as
15 you complete items, they are checked by the supervisor
16 and signed off. So you continue on that course of
17 study -- it's a study at your own rate.

18 Q Okay.

19 A So then your hours of study are really up to
20 you. You set your schedule. And then you say, for
21 instance, I'm going to study on this course Monday,
22 Wednesday and Friday from 9:30 to 12:00. And then you
23 come in on those days and study that course.

24 Q Okay. Or someone could say, I'm free on
25 Thursday, so I'm going to do two or three blocks on a

1 Thursday?

2 A Could be.

3 Q Is it normal for people to take one course at
4 a time until that course is completed?

5 A It is. It is highly recommended that they
6 take one course at a time until it is complete.

7 Q As opposed to trying to take two or three
8 courses simultaneously?

9 A That's correct.

10 Q I had also handed you earlier Defense Exhibit
11 2. I'm going to ask if you can identify that.

12 A Mm-hmm. This is the -- I guess you call it a
13 site plan. The survey of the 5395 Roswell Road
14 property.

15 Q And that is the property that's at issue in
16 this litigation; is that correct?

17 A That's correct.

18 Q All right. Put that aside. Were you involved
19 in any manner in the rezoning application that was
20 submitted to Sandy Springs for the Roswell Road
21 property?

22 A Yes. I was involved in that I was the
23 representative of the church who was assigned to liaise
24 with the legal counsel who was hired to handle that.

25 Q Did you look over the application that was

1 filed on behalf of the church before it was filed?

2 A Yes.

3 Q Did that application have to be approved by
4 CSI?

5 A I don't know.

6 Q I'm assuming that the location of the Roswell
7 church -- location of the Sandy Springs church on
8 Roswell Road had to be approved by CSI in accordance
9 with Scientology procedures. Is that correct?

10 A Yes.

11 Q All right. Are you familiar with the concept
12 of ideal organizations?

13 A Yes.

14 Q How long has that concept of ideal
15 organizations been in effect within the Scientology
16 community?

17 A I think Hubbard did some writing on it quite a
18 number of years ago in a bit of an abstract fashion, you
19 know, in direct naming this is what an ideal org should
20 be. It doesn't define space. But it talks about what
21 products one will get and what would be the environment
22 and, you know, kind of like the general feel and that --
23 it's a bit more abstract.

24 However, the ideal org evolution as we refer
25 to it did not really come into our purview here locally

1 until 2005 with the release of what we call the basic
2 books. Then we became notified that there had been a
3 project that had been ongoing researching the writings
4 and references and lectures and all of the material of
5 Hubbard to go over and pick out the points that referred
6 to specific requirements of space of an ideal org
7 setting and that this had now culminated into what would
8 be henceforth the template for every church.

9 Q And do you know when in 2005 that information
10 came out that there was now a template available for
11 ideal organizations?

12 A I don't.

13 Q Do you know if that information came out
14 before the Roswell Road site was selected?

15 A I don't. I mean, I had no knowledge of that
16 particularly, but I really couldn't say.

17 Q Is the Sandy Springs location supposed to be
18 developed as an ideal organization?

19 A Yes.

20 Q And how long have you known that the Sandy
21 Springs location is to be developed as an ideal
22 organization?

23 A I have known it since I came on post here, on
24 staff, which was August 2005.

25 Q Okay. All right. The ideal organization

1 appears to be a fairly sizeable structure.

2 A Yes.

3 Q Is Scientology abandoning smaller facilities
4 and aiming toward all organizations to be as large as
5 the ideal organization is designed?

6 A I believe that the intention is for all
7 churches to be ideal organizations. There are groups
8 and missions which are not going to be required to
9 occupy a space that large, but those are -- you know,
10 they're a different kind of facility and offer a
11 different kind of service and are fledgling, really
12 fledgling groups.

13 Q What information, if any, has CSI provided to
14 Georgia Scientology in terms of what it requires in
15 development of the Roswell Road site?

16 A What we have been given were essentially a set
17 of plans, renderings and plans that were developed by
18 Gensler, which is an engineering design company,
19 architectural, and we were sent a set of renderings and
20 floor plans that were developed for our ideal
21 organization.

22 Q Let's mark this collectively as one document
23 which will be Defense Exhibit 3.

24 (Defendants' Exhibit No. 3 was marked for
25 identification.)

1 Q (By Ms. Henderson) Miss Danos, is Defense
2 Exhibit 3 the set of plans that you just referenced?

3 A These are clearly a set of plans. I
4 personally have not seen these plans. We were not given
5 anything nearly this detailed.

6 Q All right. Then let me mark actually -- is
7 this the same thing here?

8 A Yes.

9 MS. JONES: Some of it. What happened
10 was that this one has Deb's annotations on it. You
11 got that one?

12 MS. HENDERSON: Four sheets?

13 MS. JONES: Yeah.

14 MS. HENDERSON: Let's mark that one with
15 four sheets.

16 MS. JONES: That's the same set.

17 MS. HENDERSON: I know but I want to look
18 while she's looking.

19 (Defendants' Exhibit No. 4 was marked for
20 identification.)

21 Q (By Ms. Henderson) For the record because Miss
22 Danos has not seen Exhibit 3, I'm going to keep Exhibit
23 3 in my possession and we will pull this out and use it
24 for a subsequent deposition rather than recopying those
25 oversize plans again.

1 All right. Miss Danos, I've now handed you
2 what I believe is marked as Defense Exhibit 4; is that
3 correct?

4 A Yes.

5 Q And are these the plans that you are
6 referencing in terms of being given a layout?

7 A Yes.

8 Q And you say this came from CSI?

9 A Yes. It was delivered to us from CSI.

10 Q All right. So at the time when Georgia
11 Scientology submitted information on the building on
12 Roswell Road as a possible location, did that
13 information -- well, first of all, what information was
14 given to CSI on behalf of that application?

15 A Regarding the Roswell Road building?

16 Q Yes, ma'am.

17 A I don't actually know. The decision process
18 had already been done when I arrived on staff in
19 Atlanta.

20 Q Okay.

21 A So I really don't have any knowledge about the
22 selection process or -- it was right before the contract
23 was signed on the building was when I got involved in
24 the process.

25 Q Do you know whether anyone ever sought a

1 zoning verification letter with respect to the Roswell
2 Road property prior to purchasing the property?

3 A Yes.

4 Q And who sought that letter?

5 A I don't know the specific who. I know that
6 one was obtained and I myself personally spoke to the
7 planning people while the representative was here from
8 CSI from the landlord's office.

9 Q Do you have -- is there a copy of that zoning
10 certification letter available in Georgia Scientology
11 files?

12 MS. JONES: I have a copy. I can give it
13 to you, Laurel.

14 MS. HENDERSON: Okay. 'Cause that should
15 have been produced with the documents.

16 MS. JONES: I'll be looking for it. It's
17 one of those Will O' the Wisp.

18 Q (By Ms. Henderson) Let's return, Miss Danos,
19 to Defense Exhibit 4. I'm going to have you walk me
20 through this. First of all, my understanding of your
21 testimony is that this plan was arranged by people in
22 the actual organization for Georgia Scientology?

23 A Correct.

24 Q And --

25 A Well, the international organization.

1 Q All right. I'm sorry. International
2 organization. And is it accurate to say that Georgia
3 Scientology is required to develop its facility in
4 accordance with plans that are going to be approved by
5 the international organization?

6 A Yes.

7 Q In other words, Georgia Scientology doesn't
8 have the ability to say "I think we can do this better a
9 different way" and then go off on its own and do
10 something differently?

11 A Well, not without some agreement. We could
12 suggest that.

13 Q Right. On the other hand, if it's not
14 feasible to build according to the first set of plans
15 received from the international organization, then any
16 revision would have to receive approval from the
17 international organization; is that correct?

18 A That is correct.

19 Q Okay. Have you been in the current facility
20 on Roswell Road?

21 A Yes.

22 Q How is that currently laid out? Describe for
23 me when you walk in to the first floor what you see.

24 A Well, there's a two-story foyer or atrium I
25 guess, a spiral staircase that goes up to a mezzanine.

1 And then there's a large door on the first floor where
2 you walk through into a hallway.

3 Q Do you know how the building on Roswell Road
4 was used prior to Scientology's purchase of it?

5 A I can't say definitely. I can only tell you
6 that there are various Realtor signs located in and
7 around the building. So I assume it was occupied by a
8 number of different Realtors.

9 Q With the exception of the two-story foyer when
10 one goes in, is most of the building cut up into smaller
11 offices?

12 A Yes.

13 Q Are there any other large areas other than
14 that entry hall when one first enters the building?

15 A There is a larger room on the south end of the
16 second floor and then there's a larger room on the north
17 end of the third floor.

18 Q And when you say "larger," do you have any
19 approximate dimensions for those two areas?

20 A In looking at this, it's a floor plan.

21 Q On Defense Exhibit 4. Okay.

22 A Yes. If you took -- you see the building is
23 essentially divided into three hunks here.

24 Q Right.

25 A It would be the larger portion of one of these

1 last end pieces.

2 Q Okay. So essentially the two wings on the
3 side, one on the second floor and one on the third
4 floor, is essentially open space and not chopped into
5 smaller offices?

6 A Yeah. The second floor does have some office
7 division in it. So it's not -- it's about half,
8 probably half the size. The third floor space is
9 essentially open.

10 Q All right. Let's look, then -- off the
11 record.

12 (A discussion was held off the record.)

13 Q (By Ms. Henderson) We're back on. Miss Danos,
14 looking at the first page of Exhibit 4, this appears to
15 be the plan for the basement floor area. What is in
16 that basement floor area at the current time?

17 A Mechanical rooms. Mechanical rooms and
18 storage space, elevator entries, and open, just open
19 basement.

20 Q In terms of there's a central -- let's refer
21 to the central square as the central portion and then
22 two wings on either side. Is that agreeable to you?

23 A Sure.

24 Q This shows a mechanical area on the northern
25 wing.

1 A Mm-hmm.

2 Q As well as a mechanical room on the southern
3 wing. Are the existing mechanical rooms in
4 approximately the same location, or are they located
5 differently?

6 A No. They are there.

7 Q All right. This also shows an existing cell
8 phone tower, electrical room on the north wing. Is that
9 also used for that purpose at the current time?

10 A It is no longer used for that purpose. It is
11 still sitting there, however.

12 Q All right. And this also shows two elevators.
13 Are there currently two elevators in the building?

14 A Yes, they are.

15 Q And are those at the same location as are
16 shown on the plans?

17 A Yes.

18 Q Are there also existing stairwells at the same
19 locations that are shown on this plan?

20 A Yes.

21 Q All right. With those exceptions, is the rest
22 of the basement pretty much currently open?

23 A No. On the south end where you see offices on
24 what would be the west side, which would be the lower
25 part of the page, those are -- there are walls there.

1 There are offices there, or rooms there.

2 Q All right. And do the size of those rooms
3 correspond pretty much to what is shown in this plan, or
4 is this plan different?

5 A This is different.

6 Q Okay.

7 A I mean, they're roughly -- it's roughly the
8 same area, but some of the walls are not there. It's a
9 different configuration.

10 Q Okay. Are there currently any restrooms on
11 that basement level?

12 A Not that I can recall.

13 Q All right. What about the center core, is
14 that open or is that cut up at the present time?

15 A It is open.

16 Q And is that area devoted to parking at the
17 present time?

18 A Right now there are book stocks and church
19 records that are stored in that space.

20 Q All right. And those are Scientology
21 materials?

22 A That's correct.

23 Q All right. Is there a marked parking area in
24 that center core of the basement?

25 A It appears that there had been parking marked

1 in there at one time. I don't believe you can really
2 see much of it at this point.

3 Q And what about the northernmost wing. With
4 the exception of the mechanical room and the phone room,
5 is that area open or is it divided?

6 A It is open.

7 Q And does that also appear to have areas that
8 were used for parking at one point?

9 A Not so much. I don't believe so.

10 Q So does it appear that the parking that is on
11 the basement level or that was on the basement level is
12 confined mainly to this center core?

13 A It would appear that way, but I'm no expert.

14 Q Okay. All right. That's fair enough. And
15 there's also currently a garage door on the north end of
16 the building at the basement level; is that correct?

17 A That is correct.

18 Q And is that door maintained on these plans in
19 approximately the same location? It says "existing
20 garage door."

21 A I'm unsure whether that is -- the garage door
22 is intended to stay. I don't actually know.

23 Q What is the plan -- let's look, staying with
24 the basement.

25 A Okay.

1 Q We have a central area that's labeled as a
2 chapel. And then above that there is an area for lobby
3 and seating and a couple offices.

4 A Mm-hmm.

5 Q What is the seminar room, the Dianetics
6 seminar room, what is that used for?

7 A That is used for the delivery of the Dianetics
8 seminar which is a one-time -- it's a seminar like any
9 seminar where you deliver to new people and that is
10 their introduction to Dianetics auditing. So for the
11 day they come in and they learn and they do.

12 Q Okay. And then that course is over with, it's
13 a one-time, one-day thing?

14 A Well, it's a one-time thing but it doesn't
15 necessarily a one-day -- for your participation it is a
16 one-day thing. It is delivered every day. Or would be
17 ideally delivered every day to a different group of
18 people.

19 Q Then there are also in that central core three
20 areas denominated as course rooms.

21 A Mm-hmm.

22 Q Now, you've got some I note on this lower
23 right core room -- what does that say?

24 A That is personal efficiency courses.

25 Q All right.

1 A So those are public courses of the manner of
2 the variety that I was talking to you about of the
3 volunteer minister which are short, like, say, how to
4 get along with others.

5 Q Okay.

6 A You know, just some basic --

7 Q I know some people who could use that course.

8 A And these actually, both of those rooms would
9 be dedicated to the delivery of that kind of course
10 which would be a public, brand new public course.

11 Q All right. Those are not the kind of courses
12 that when we referred to earlier as taking courses to
13 learn about -- these are more basic generalized courses?

14 A Right. These are like, you know, how to get
15 through the day at work or how to talk to your spouse
16 or, you know, those kind of self-improvement, fully
17 personal efficiency self-improvement.

18 Q Okay. And the offices that are in the
19 southern wing, what would those offices be used for?

20 A Those are executive offices.

21 Q Would your office be in that wing?

22 A Yes, it would.

23 Q And then on the other end in the north wing
24 there's a very large office. That looks almost too
25 large to be an office. And then another office above

1 it. What are those offices used for?

2 A You know, I don't have the plans or the
3 listing with me, but all this area here would be
4 estates. So anything -- really it would be anything
5 having to do with maintaining the property and
6 maintaining the building and any, you know,
7 construction-type related activity.

8 Q Okay. Let's go to the next page which is the
9 first floor plan.

10 A I guess maintenance activity would be more
11 accurate.

12 Q All right. Building maintenance and so on and
13 so forth?

14 A Yes.

15 Q Property maintenance?

16 A And landscape. Building and property
17 maintenance.

18 Q This shows an entry lobby with a spiraling
19 staircase. Is that the current configuration --

20 A Yes.

21 Q -- that exists at that location?

22 A Mm-hmm.

23 Q And then what is the film room used for?

24 A The film room is to introduce public to some
25 basic Scientology tenets. So any of our public films

1 would be shown in that like Dianetics, the Dianetics
2 film, or the Scientology overview. Those kinds of
3 things.

4 Q What about Division 6 office testing, what is
5 that?

6 A That is the space that is used for, as the
7 story I shared with you earlier on my own entry into
8 Scientology, where one would sit down and take the
9 Oxford Capacity Analysis, the OCA. Or any number of
10 other testing devices that are used to help the
11 registrar to evaluate the individual on what education
12 and course work might be best suited for them.

13 Q What is the significance of Division 6?

14 A Division 6 is our public division. We have an
15 organizing board that essentially outlines the
16 construction of the organization. You have your various
17 divisions. And that division, Division 6, is the
18 division devoted to handling new public.

19 Q Okay. I assume that if there's a Division 6
20 that there are Divisions 1 through 5 as well?

21 A There are.

22 Q And can you tell me briefly what those
23 divisions would encompass.

24 A Division 1 is what's called the Hubbard's
25 communications office. This has to do with

1 communication and routing and personnel. And Division 2
2 is the dissemination division. It has to do with our
3 promotional materials and dissemination. Division 3 is
4 the treasury area. Division 4 is our area that is
5 devoted to the delivery of service and our counseling.
6 So it's kind of the hands-on portion. And Division 5 is
7 what's called our qualifications division. And that is
8 the area of the organization which oversees the quality
9 of the delivery and the essential quality of the
10 organization itself to ensure that it meets the
11 standards of the mother church.

12 Q Okay. All right. In the upper left-hand
13 corner of that central core there's an office and you've
14 got initials LRH. What does that stand for?

15 A That is a space that is typically set aside in
16 memorium, if you will, for the founder of the church, L.
17 Ron Hubbard. And it is an office that is roped off and
18 just set there to remind the staff and the parishioners
19 that L. Ron Hubbard has a presence in every church.

20 Q Okay. And what is classic events and source
21 briefing on the bridge between the northern wing and the
22 central core?

23 A That is a film room, if you will. More or
24 less a film room and more a large screen TV with DVDs
25 where one could go in and choose any number of

1 recordings of past events that have been --
2 international events or lectures or taped videos of L.
3 Ron Hubbard speaking at certain events that one could go
4 in there and see them.

5 Q Okay. And then there is apparently a
6 bookstore in the north wing; is that correct?

7 A Correct.

8 Q And are the other uses in that wing related to
9 the bookstore or to audio-visual material?

10 A That's correct.

11 Q And are those all materials that are available
12 for purchase?

13 A Yes, they are.

14 Q Going back to the central core, there's a
15 large area for information displays. Is that an area
16 that's open to the public?

17 A Yes.

18 Q And would the bookstore and the AV room and
19 the film room also be open to the public?

20 A Yes.

21 Q So if someone who knows nothing about
22 Scientology were to come in, they would have access to
23 the core and to this north wing?

24 A That is correct.

25 Q What about the south wing, what is designed to

1 go there?

2 A The south wing is the course, the study area
3 for relatively new individuals.

4 Q Okay.

5 A It wouldn't be the really, really new. It
6 would be the intermediate step.

7 Q Okay. All right.

8 A And these are the course rooms devoted to the
9 specific courses that are available to someone in that
10 level of study.

11 Q And can you go through and explain what the
12 initials you've put on here mean.

13 A Sure. The course room on the bridge between
14 the two sections of the building is the success through
15 communications course. And that is an entry level
16 course that teaches one how to communicate effectively.

17 Q Okay.

18 A The course room next to that is the life
19 improvement course room. And this is a series of
20 courses that are developed to help you achieve success
21 in life, you know, still relatively rudimentary life
22 function type things.

23 Q Okay.

24 A Then you have below that the large room is the
25 Hubbard Apprenticed Scientologist, or Hubbard Qualified

1 Scientologist course room theory portion. So this would
2 be where you would study one of those two courses. Like
3 library-type. It's quiet. It's study there. Quiet
4 study.

5 Q Okay.

6 A The course room just above that, the HAS/HQS
7 practical, would be the course room that you go to when
8 you need to drill or practice some portion of your
9 study.

10 Q And will you drill or practice with another
11 person?

12 A That's correct. And then further up the
13 hallway from that you have the HAS co-audit which is yet
14 another wing of the HAS course, the Hubbard Apprentice
15 Scientologist. This is a course room where you would
16 practice essentially counseling or ministering with
17 another individual.

18 Q And those are two individuals of about the
19 same level practicing with one another?

20 A Yes.

21 Q Okay. And is that designed to have two people
22 alone in that room or more than one pair operating at a
23 time?

24 A There may be more. But understand that the
25 affiliated rooms -- once you fill up the theory room,

1 the affiliated rooms may or may not have anyone in them
2 at any given point in time. So they're available for
3 use.

4 Q And how many people could be in the theory
5 room at any one time?

6 A I don't know. Based on this particular space
7 I would have to do a math calculation.

8 Q Is that course, the theory room, is that set
9 up as totally independent study?

10 A Yes.

11 Q So there's no lecture or presentation or
12 anything that occurs as --

13 A No.

14 Q -- part of that? Okay. And then the office
15 in the upper right, what is that?

16 A That is the extension course supervisor. So
17 that is the space that the person uses who is guiding
18 our extension courses.

19 Q So the first floor is basically devoted to
20 people who know nothing, are curious, are just starting
21 out or just a step above just starting out?

22 A That's correct.

23 Q Okay. How many people will the film room be
24 set up to accommodate at one time; do you know?

25 A Which film room?

1 Q The public film room that's here in the
2 central core of the first floor.

3 A I have no idea what the layout of that space
4 will be. Typically there are few chairs in those. You
5 don't have 20 or 30 people coming in at any one point in
6 time. I've seen as few as two and as many as six.

7 Q Okay. What about the Division 6 testing
8 office, is that going to be a one-on-one with a staff
9 member?

10 A That is typically divided up into study
11 carrels or testing carrels and that kind of a thing.

12 Q Okay. So how many people could occupy that
13 office at one time?

14 A I don't know. I don't actually even know how
15 big a space that is.

16 Q Let's move to the second floor plan and walk
17 me through this one.

18 A Well, as you come up to the mezzanine there up
19 the stairs, you are standing in a reception area. And
20 there's a receptionist there because one would need to
21 be directed to a location on this floor.

22 Q Okay.

23 A It wouldn't necessarily be free roaming unless
24 you were a staff member or an already participating
25 student.

1 Q And this would not be an area that would be
2 open to the public and people who are just curious?

3 A That's correct.

4 Q All right. So how is this room designed --
5 this floor designed to be set up?

6 A On the north end you have essentially your
7 qualifications area. So you have a library there for --
8 the qualifications library is for the purpose of
9 students or counselees who need to -- who have a
10 deficiency in some area of their education and they need
11 to restudy or reassert some information. And they would
12 go there to do that with some guidance.

13 Q It's detention?

14 A No. It's a -- you've been through this three
15 times and you still don't get it, so let's go find out
16 what's going on.

17 Q Okay. All right.

18 A Then the office there to the north of that is
19 really essentially for what we call our interns. So
20 those would be ministers in training, Auditors who have
21 completed their course of study and are now practicing,
22 you know, under the guidance of the qualifications
23 division.

24 Q Okay. So they practice with supervision
25 before they're allowed to practice alone?

1 A Correct.

2 Q Wise choice. Okay.

3 A Then on toward the bottom of the page there on
4 the west end of the building is the communications area.
5 So that's the area where we have, you know, files and we
6 handle -- there's a Telex system that connects all of
7 the organizations of the world together, our personal
8 communication line and the related activity.

9 Q What takes place in the interview rooms that
10 are here?

11 A Any number of things involving either the
12 qualifications area or the communications area. And
13 some of those would be having to do with any difficulty
14 that one might have come upon in their study or in their
15 life where they could meet with a staff member in a
16 private setting.

17 Q Okay. How many people are going to be housed
18 in that communications office?

19 A I don't know. I mean, currently we have two.
20 One is the day person and one is the evening person.

21 Q That's likely to grow as everything else
22 expands; is that correct?

23 A I would assume to some degree, although I
24 really don't know what the specific designation is for
25 occupancy on that space.

1 Q And then on the bridge there's an ethics
2 office. What is that about?

3 A That is where someone would go to receive some
4 suggested study in an area of deficiency in their life
5 where they have a hard time maintaining their integrity.

6 Q Okay.

7 A Was that well spoken?

8 MS. JONES: Yeah.

9 Q (By Ms. Henderson) All right.

10 MS. JONES: Don't want to go to the
11 ethics office.

12 MS. HENDERSON: You sound like you've
13 been there.

14 THE WITNESS: Well, haven't we all in
15 some fashion.

16 Q (By Ms. Henderson) Then we've got a series of
17 offices in the main pod. What are those offices? Who
18 are those offices designed for?

19 A I am going to assume at this point, because
20 they are not labeled, that they are the offices of the
21 various supervisors of the various course rooms.

22 Q Okay. And I see a café.

23 A Mm-hmm.

24 Q That is for people who are there in the
25 building?

1 A Yes. That is available actually to the
2 public, the café.

3 Q Okay. All right. And then LOC course room.
4 What is that?

5 A That is a specific course called the life
6 orientation course. And it has a singularly devoted
7 course space and a singularly trained supervisor. So
8 you only study that course in that course room.

9 Q What is the KTL course room?

10 A That is the course which actually precedes the
11 life orientation course. It is called the key to life
12 course. Also has a specific function and a specifically
13 trained course room supervisor.

14 Q How many people could take the key to life
15 course at one time?

16 A I don't know. My personal observation and
17 experience is that it is not a -- it is not a course
18 that is on one's specific line-up. It is a course that
19 one could be directed toward if they were having some
20 specific difficulty in life. So it just would vary
21 widely. But typically I'm not -- I've seen maybe, I
22 don't know, in my recent travels I have seen maybe four
23 to six people in that course room.

24 Q What about the life orientation course, is
25 there a limitation on how many people could take that at

1 one time?

2 A Well, of course, all of it's going to be
3 limited by space.

4 Q Right.

5 A So, you know...

6 Q And that's what I'm trying to get a sense of.

7 A Mm-hmm.

8 Q I mean, obviously you have a certain amount of
9 space. There seems like however you operate, there's a
10 maximum number of people you can fit in a space that's
11 allotted for that function.

12 A Yeah.

13 Q And that's what I'm trying to figure out.

14 A Yeah. Well, again, it would be similar to the
15 other course room. Because they are related and one
16 would progress from one to the other. And, I mean,
17 there could be times when there would be no one in it.

18 Q Right.

19 A And there would be times when there would be
20 several people in it. But I have no way of speculating
21 what that would be.

22 Q What about the larger course room that's in
23 the bottom of that central portion?

24 A Yeah. That would be what's called TRs and
25 objectives. And that is a -- that is a practice room.

1 It's typically very noisy. So you see it's really not
2 surrounded -- there's nothing really very close to it
3 that can be disturbed by the activity in that room. And
4 it's a lot of practical application.

5 Now, I've noted at the top it says "op pro by
6 dup." This is a very specific one practice regimen that
7 has a very specific set-up with just a table and a
8 bottle and some things that are set there for practice
9 purposes. So it's a designated space.

10 Q Okay.

11 A There wouldn't be many people in this room
12 because you need a lot of space to do what you do in
13 there.

14 Q These plans you say you're not familiar with
15 which are much more detailed.

16 A Do they name the function of every room on
17 there or just the --

18 Q I don't know.

19 A -- walls?

20 Q I don't think they -- they have some numbers
21 like 205, 220. And I don't know that that refers to
22 anything other than you've got to call the space by
23 numbers so you can find it back.

24 A Yeah.

25 Q But some of them seem to have what appears to

1 be table layouts.

2 A Mm-hmm. Yeah.

3 Q To the extent that they've got layouts
4 suggested, my assumption is that you can figure out what
5 the limitation of a room would be by how it's laid out.

6 A I would assume so, yes.

7 Q I've ask that of the people who are coming
8 next May.

9 MS. JONES: And they should know.

10 THE WITNESS: Very good idea.

11 Q (By Ms. Henderson) Moving to the south wing.
12 Tell me what you have there.

13 A We have again as we saw on the first floor a
14 theory academy. Theory course room at the bottom end
15 there on the west side which is essentially where all of
16 the people who sign up for that course would do their
17 quiet study. And then every other course room in that
18 wing is devoted to some aspect of practice related to
19 that theory. And the Academy is that place where one
20 learns to be a minister, an Auditor --

21 Q Okay.

22 A -- of the church.

23 Q Okay. So this whole wing would be devoted to
24 the development of Auditors?

25 A That's correct.

1 Q Okay. And how many people is this wing
2 designed to be able to support at any one given time if
3 it were fully utilized?

4 A Again, I can only assume that however the --
5 the Academy is set up with chairs and tables. So space
6 wise whatever would be the allowable number in there and
7 with a course supervisor and his space. That's however
8 many it would be. I don't know the number.

9 Q Then let's go to the third floor and tell me
10 about the layout for the third floor.

11 A The third floor is accessible by stair or
12 elevator. So on the north end of the building we have
13 what is called our purification rundown center. And
14 that is really essentially a sauna and exercise program
15 that is designed to rid the body of toxins, the toxins
16 you pick up from foods and air and water and chemicals
17 and so forth, so that you can think more clearly and be
18 more healthy. So you've got the exercise room that's
19 marked there, changing rooms and a men's sauna and a
20 women's sauna.

21 Then --

22 Q Just out of curiosity, why have the -- I
23 understand why the changing rooms are separated by sex.
24 But why would the sauna be separated by sex?

25 A I don't know specifically. I can only imagine

1 that I think some folks may prefer to sit in the sauna
2 just in a towel and so you're free to do that if you
3 choose if it's same sex sweating.

4 Q Okay. All right.

5 A Toward the body of the building on the north
6 end, that segment of offices on the north end of the
7 hallway is devoted to the spiritual counseling of the
8 staff.

9 Q Okay.

10 A So these would not necessarily be occupied
11 other than during times when the staff are receiving
12 spiritual counseling specifically. So there is a
13 dedicated person who is part of the staff who is the
14 minister's minister.

15 Q Mm-hmm.

16 A And the waiting room underneath that is the
17 general waiting room for all people who are scheduled to
18 receive counseling. And then pretty much everything to
19 the south of that, those small rooms, are counseling
20 rooms where there would be one-on-one counseling. It is
21 my understanding that there is a designated room for
22 each counselor. So if I were a church counselor, I
23 would have a room that would be my room.

24 Q Okay.

25 A And every time I had a client or a parishioner

1 who scheduled some auditing, I would do that in my room
2 and that would be my room for all time.

3 Q 20 of those offices are numbered. I assume
4 those are all auditing offices?

5 A I'm assuming.

6 Q Are the smaller offices around there that are
7 not numbered also available for auditing, or are those
8 for other purposes?

9 A I'm assuming they are not auditing space. I'm
10 assuming that they are office space for the benefit of
11 the various ministers for whatever adjunctive activity
12 they may need.

13 Q So you may be doing something with courses on
14 the second floor or the first floor, but you have an
15 office on the third floor?

16 A It's possible.

17 Q And I believe that your discovery responses
18 indicated that there is anticipated that there will be
19 100 staff members during the weekday and another 100
20 staff members in the evening and weekends; is that
21 correct?

22 A Yes. That is -- quite frankly, I can't recall
23 the exact reference where Hubbard speaks about this. He
24 talks about the -- his Saint Hill organization where he
25 had those numbers of staff and that is the aspired

1 number. So that's what we anticipate. I mean, right
2 now I don't know where they are.

3 Q Going from 20 staff members to 200 staff
4 members I assume will not be an overnight process.

5 A I assume it will not be.

6 Q Do you have any indication of how quickly the
7 Sandy Springs facility would be able to ramp up to that
8 staff level?

9 A I can tell you that when this has been done in
10 other organizations it has been accomplished in a period
11 probably less than six months.

12 Q Okay. And is it fair to say that if you have
13 a certain number of staff members, whatever that is, you
14 have at least as many or more members of the public
15 utilizing those services?

16 A They are completely disrelated in actual fact.

17 Q Okay.

18 A I mean, overall, yes, of course. At any one
19 time, no. Just because of the way that we deliver our
20 service.

21 Q Are the staff -- who are the staff members at
22 Georgia Scientology paid by?

23 A They are paid by the Church of Scientology of
24 Georgia.

25 Q So what is the source of funding for those

1 salaries? Is it the courses that people buy?

2 A Mm-hmm.

3 Q And if courses are not purchased, then those
4 positions cannot be funded; is that accurate?

5 A That is relatively accurate. We are
6 essentially volunteers. And we are -- we have a pay
7 plan that is -- it's a calculation of your weekly
8 income. So it's a production-based pay. So whether a
9 particular post is funded or not is an irrelevant term.
10 We post someone there and then we all pull together to
11 deliver and promote our activities as much as we can and
12 if we're successful at it, we're well paid. And if
13 we're not very successful at it, then we're not very
14 well paid.

15 Q I assume, though, that staff members are not
16 going to be added if there is no need for their
17 services. Is that a fair assumption?

18 A That -- I don't actually know if that's a fair
19 assumption. You know, the church policy is to put a
20 person in that place and because we need a person in
21 that place to provide that service. And so if there's a
22 person in that place, then they will have -- they will
23 by virtue of being there create their own work. If
24 there's no one there, then there's nothing happening.

25 Q Okay. When Auditors work, they work

1 one-on-one with a client; is that accurate?

2 A Yes.

3 Q So if there is no work with a client, there's
4 nothing for that Auditor to do?

5 A Oh, yes, there's plenty for that Auditor to
6 do.

7 Q Okay. What would that Auditor be doing if
8 they don't have clients to work with?

9 A That Auditor would be writing letters to his
10 potential parishioners. An Auditor would be calling his
11 parishioners. He would be aiding in any number of the
12 other organization functions that are all-hands
13 activities.

14 Q All right. And the people who teach the
15 various courses, is there an average class size for
16 those courses?

17 A Not that I would venture to say. It just
18 varies.

19 Q Is it fair to say that most of the courses
20 would have at least four or five people taking a course?

21 A It would be an invention on my part to say
22 that. I just have no idea. It varies. You know, you
23 have someone who gets on to a course and, say, it lasts
24 two weeks. And maybe for this two weeks you've got six
25 people in that course and for the next three weeks

1 there's no one. So it just varies wildly.

2 Q What is the largest course that has ever been
3 offered by Georgia Scientology at the Dunwoody location
4 in terms of number of participants?

5 A I don't have that information. Currently we
6 are in a very nonstandard environment. Very
7 nonstandard. And so we have all of our courses in the
8 same room. So the numbers of people who are on one
9 course or the other is kind of irrelevant. And I really
10 don't know who is studying what when I look in a course
11 room. There are students. What they're studying, I
12 don't really know.

13 Q All right. Let's mark this one final document
14 before we break.

15 (Defendants' Exhibit No. 5 was marked for
16 identification.)

17 Q (By Ms. Henderson) I've handed you Defense
18 Exhibit 5. Do you recognize that document?

19 A This is the certificate of zoning.

20 Q And that is the zoning certification letter
21 that Georgia Scientology received before they purchased
22 the Sandy Springs property?

23 A Yes. It does look to be that.

24 Q Okay. Let's take a break for lunch.

25 (A luncheon recess was taken from 12:28 to

1 1:05 p.m)

2 Q (By Ms. Henderson) Let's go back on the
3 record. Miss Danos, referring back to Defendants'
4 Exhibit 5, this indicates only the zoning category
5 that's attached to the property. It references a file
6 and then there is a paragraph at the bottom underlined
7 indicating that either the resolution or the case file
8 should be reviewed for further details about the zoning.

9 A Mm-hmm.

10 Q Do you know if anyone from Georgia Scientology
11 did any further study of all the specifics attached to
12 the zoning of the property after receipt of that letter?

13 A I don't know if anyone else was in
14 communication with Fulton County zoning. I myself did
15 call. I didn't do any in-depth study per se, but I did
16 speak to the individual at the planning department and
17 inquired about our ability to occupy that space, and I
18 was given the indication that there would be no
19 difficulty whatsoever in our inhabiting that building.

20 Q Were you given information that there was a
21 square footage limitation on the building --

22 A No.

23 Q -- by the zoning?

24 A Huh-uh.

25 Q Were you given any information that the

1 building was restricted to office use?

2 A No.

3 Q All right. And you say you did not yourself
4 examine the full file?

5 A That's correct. I did not.

6 Q At some point Georgia Scientology sought
7 rezoning of the subject property in order to remove the
8 restriction on office use only so that the property
9 could be used for a church as well as seeking some other
10 variances.

11 What do you know as to the reason for seeking
12 the rezoning? How did it become apparent that rezoning
13 would be necessary to use the property for a church?

14 A I was not personally involved in that
15 discovery. I believe that was made by individuals at
16 CSI. And it was indicated to me at the time that it was
17 strictly an administrative activity.

18 Q Have you ever been involved in zoning before?

19 A No.

20 Q Who handled the rezoning on behalf of Georgia
21 Scientology? Who was in charge of that effort?

22 A Well, the only zoning that we've had any
23 involvement in was this particular zoning. And as I
24 stated earlier, there was some communication prior to my
25 involvement between CSI and our current legal counsel.

1 Q Okay. And is it your understanding that the
2 restriction limiting the building to office use was
3 removed by the City of Sandy Springs?

4 A In the current zoning?

5 Q Yes.

6 A Yes.

7 Q And that the church is -- the building is able
8 to be used by Scientology for a church according to the
9 City. Is that your understanding?

10 A It is my understanding with restriction.

11 Q All right. And the primary restriction, the
12 one that we are in a lawsuit over, concerns the use of
13 the area that was designated for underground parking
14 prior to Georgia Scientology's purchase of the building;
15 is that correct?

16 A That is the space that's in contention.

17 Q All right. And how many parking spaces were
18 designated in the basement for parking in the
19 application; do you recall?

20 A It's my understanding there were 30, although
21 I have not personally counted them. But that's the
22 number that I've heard.

23 Q All right. And how many spaces were located
24 outside the property for parking that are on the subject
25 property?

1 A I believe 81, if I'm not mistaken.

2 Q Now, did that 81 also include the 30 spaces
3 under the building?

4 A No. I don't believe so.

5 Q You don't believe so. To your knowledge would
6 the information on the application have been accurate at
7 the time it was filed?

8 A Yes.

9 Q And you do not dispute, do you, that there are
10 32,053 square feet of building on the top three floors
11 of the building?

12 A I am not a specialist in this area. This is
13 the number -- or this is similar to the number I've
14 heard. I really couldn't say what the exact square
15 footage is.

16 Q Okay. The next document that I'm going to
17 hand you is marked as Defense Exhibit 6.

18 (Defendants' Exhibit No. 6 was marked for
19 identification.)

20 Q (By Ms. Henderson) I'm going to ask if you
21 recognize that.

22 A Yes. This appears to be the parking study
23 that was done on behalf of the church by Kimley-Horn and
24 Associates.

25 Q Were you involved in obtaining that parking

1 study?

2 A Somewhat.

3 Q Tell me your involvement.

4 A It was told to me that CSI and our current
5 legal counsel had agreed that this would occur and so I
6 was informed that it was occurring.

7 Q Okay. Did you have any involvement in the
8 selection of Kimley-Horn?

9 A No.

10 Q Did you have any involvement in the selection
11 of Nashville as a comparable site for study?

12 A Only in that I was asked to provide names of
13 churches that were nearby that had been recently made
14 into ideal orgs. And so I presented a number of them.
15 And between our legal counsel and CSI, a couple were
16 chosen as representative as being similar to Atlanta.

17 Q Okay. So the decision as to who to actually
18 use to perform the parking study as well as what
19 facilities to use as comparable facilities was a
20 decision made between CSI and your legal counsel; is
21 that correct?

22 A I believe that's the case. I mean, it was --
23 because we are at the forefront of the ideal org
24 evolution, there are not so many. A number of them
25 exist in downtown areas where parking is simply

1 irrelevant. So it was just a matter of locating
2 organizations that actually had on-site parking and were
3 required by some law to monitor that parking.

4 Q And did Nashville -- was Nashville's location
5 in a downtown area?

6 A It is not.

7 Q Did it have on-site parking?

8 A It does.

9 Q Does Nashville also have street parking
10 available in the vicinity of the church?

11 A I think they do have some street parking from
12 my recollection of being there, although I don't really
13 know what the legality is of -- when we were there, it
14 was a grand opening so there were people parked -- there
15 were police and blocked-off streets. And so I actually
16 don't really know if it's allowed to park on the street
17 there.

18 Q Grand opening, you were present at a grand
19 opening of the Nashville facility?

20 A Yeah.

21 Q When was that?

22 A A year and something ago. A year and a half
23 ago.

24 Q Okay. So Nashville is a relatively new
25 Scientology Church, at least at that location?

1 A Yes.

2 Q Do you know if the Nashville church is served
3 by public transportation?

4 A I don't know. It's not very -- it's close to
5 some major arteries. So I'm assuming, but I personally
6 did not observe whether there were bus stops there or
7 not.

8 Q All right.

9 (Defendants' Exhibit No. 7 was marked for
10 identification.)

11 Q (By Ms. Henderson) Miss Danos, I've now handed
12 you Exhibit 7 and ask if you can identify that.

13 A I don't know that I've seen this specific
14 document. Let's see if some of the stuff -- I mean,
15 some of the pages in it are familiar to me, but the
16 letter is not addressed to me and I don't know that I
17 received a copy of that letter.

18 Q Are you aware that a supplemental parking
19 study was done involving the Buffalo, New York,
20 Scientology location?

21 A Yes.

22 Q Have you ever been to the Buffalo, New York,
23 Scientology location?

24 A No, I have not.

25 Q Did you have any involvement in selecting

1 Buffalo as another comparable site?

2 A No.

3 Q Would that have been a decision made between
4 CSI and your legal counsel?

5 A Probably. I mean, on the same criteria of
6 what other churches in the situation where they are
7 needing to be monitored on their parking.

8 Q Do you know if the Buffalo church is downtown?

9 A I don't.

10 Q Do you know how old that church facility is?

11 A I don't. I know it's been there since the
12 '70s because I know people who went there in the '70s,
13 although I don't think that they were in that building
14 at that time.

15 Q Do you have any idea how long the Buffalo
16 church has been in its current building?

17 A I don't.

18 Q Do you know if that building is served by
19 public transportation?

20 A I don't.

21 Q Do you know if there's on-site parking at that
22 building -- or on-street parking?

23 A On-street parking? I don't know for a fact.
24 I seem to recall some talk about there being some street
25 parking, but honestly I don't know.

1 Q Are you aware that the numbers going back to
2 Defense Exhibit 6 for the Dunwoody church indicate that
3 virtually every person in the church apparently drove to
4 get there? I'm referring specifically to -- let me find
5 the table. Take a look at page 3 of the report. You
6 see table 2 at the bottom of the page?

7 A Mm-hmm.

8 Q That table indicates that on a weekday at 8:00
9 p.m. there were 30 people in the building and 22 parking
10 spaces were utilized.

11 A Mm-hmm.

12 Q Do you know who compiled the information in
13 this table?

14 A One of the associates from Kimley-Horn.

15 Q Do you know whether that associate was aware
16 that staff had been directed to park in the rear of the
17 building?

18 A Yes. He was given all the information.

19 Q And do you know whether the staff parking
20 spaces that were utilized were counted in the number of
21 parking spaces utilized?

22 A What was done was that a staff member was sent
23 out to the parking lot with him to indicate where the
24 staff parked and any vehicles that could be recognized
25 in the immediate in front of the door that were people

1 who were inside.

2 Q Okay. This table indicates that on Saturday
3 at 4:30 p.m. there were eight [sic] people in the
4 building and 16 parking spaces were used. Is that
5 correct?

6 A 18 people in the building?

7 Q Yes.

8 A And 16 parking places?

9 Q Yes.

10 A That's what the table says.

11 Q And it also indicates that on Sunday at 11:00
12 a.m. there were 15 people physically in the building and
13 14 parking spaces were used; is that correct?

14 A That is what the table shows.

15 Q And it shows on Sunday at 2:00 p.m. there were
16 21 people in the building and that 20 parking spaces
17 were utilized; is that correct?

18 A That is what the table shows.

19 Q Do you have any reason to believe -- first of
20 all, do you believe that these numbers in the table are
21 accurate?

22 A I have no reason to believe they're
23 inaccurate.

24 Q Do you have any reason to believe that once
25 Georgia Scientology moves from Dunwoody to Sandy Springs

1 people's mode of arriving at the church will be
2 different than it is currently in Dunwoody?

3 A I do. Typically in an ideal org situation the
4 staff are encouraged to move in to the vicinity so that
5 they can walk or take public transit, and this is the
6 standard method in other ideal orgs and other Churches
7 of Scientology. Public, they do what they want.

8 Q Do you currently live in the vicinity of the
9 Sandy Springs location?

10 A I live about 15 minutes away.

11 Q Is it your intention to move to a location
12 where you can walk to the Sandy Springs location?

13 A It is my intention to move very close to the
14 new organization when we get it settled.

15 Q In paragraph 17 the allegation is that
16 Scientology was treated less favorably than other
17 churches. Can you identify any churches that you
18 believe were treated differently than Scientology?

19 A I don't personally have that information.

20 Q Who would have that information?

21 A Legal counsel I believe has done sufficient
22 research in that area to have been able to cite
23 instances.

24 Q Well, legal counsel doesn't get to testify.
25 And I'm entitled to find the information. So who is

1 available to testify would be able to provide me with
2 that information?

3 MS. JONES: I'll state for the record
4 that Nancy Leathers will provide that information
5 at her deposition. Deb said she doesn't have the
6 information.

7 MS. HENDERSON: I'm asking her if she
8 knows who might have the information besides you.

9 Q (By Ms. Henderson) Do you have any information
10 as to anybody associated with Scientology other than
11 your legal counsel who might have information on that?

12 A I don't know of anyone in the church who has
13 that specific information at this point in time.

14 Q Okay. Talk to me about the bridge. What is
15 the bridge?

16 A The bridge is simply a word used to describe
17 one's progression through education as a Scientologist
18 and one's own personal spiritual awareness.

19 Q Will different people's bridges look different
20 or are people's bridges designed ultimately to be very
21 similar to one another?

22 A Well, you could say there is a core routine of
23 study upon which there might be addendums depending upon
24 the person's personal needs or personal travails in
25 life.

1 Q Is there a point in time in which a bridge can
2 be completed?

3 A There is. Currently we have a specific
4 portion of the bridge that is available, yet there are
5 additional courses of study that have yet to be
6 released, and there are some requisite conditions that
7 have been outlined by the founder before they can be
8 released. And getting the ideal organizations all
9 established is one of those prerequisites.

10 Q So at this point in time the bridge cannot be
11 completed because all of the components have not yet
12 been released?

13 A That is correct.

14 Q How many levels of training are there
15 currently that are related to the bridge that would be
16 mandatory components of the bridge?

17 A If one aspired to complete the entire bridge,
18 which one may or may not, only -- the only training
19 required would be the Auditor training through what's
20 called level 4. Because they would need to apply this
21 technology to themselves as they progress up the upper
22 end.

23 Q So they would not be required to take other
24 types of courses; that would be a choice as to what they
25 chose to take?

1 A It would be a choice other than the specific
2 Auditor training courses.

3 Q Is that anticipated -- is it anticipated that
4 all the steps of the bridge once they're available can
5 be completed at an ideal organization?

6 A No.

7 Q The upper steps would still need to be done
8 elsewhere; is that correct?

9 A That is correct.

10 Q I'm going to ask you to review paragraph 44 of
11 the Complaint.

12 A Mm-hmm.

13 Q And again, for the purpose of trying to
14 quantify the number of bodies in the building, if the
15 building were used to its full capacity assuming your
16 staff of 200, how many courses could be expected to be
17 operating simultaneously and how many -- I understand
18 people are operating at different levels in courses and
19 they're operating independently. But how many people if
20 the building were used to capacity could be expected to
21 be involved in course work at one time?

22 A I just have no way of computing that number.
23 You know, all I could really do would be to sit down and
24 calculate our historical records based on what we have
25 done in the past and then try to project some number

1 into the future of the courses that we are not able to
2 deliver now that we will be able to deliver if we have
3 sufficient space. But I just really don't -- I just
4 really don't have any way of knowing that.

5 Q Okay. And is it fair to say that there is no
6 way to legitimately compute that number in advance as we
7 sit here today?

8 A You know, as I said, I think that one could
9 look at historically what's been provided and the
10 numbers that have been there and then add, you know, the
11 additional course rooms and what has historically been a
12 number from various other churches in the U.S. typically
13 how many people are in those courses. I suppose some
14 number could be arrived at, but I don't know what that
15 number is at this moment.

16 Q Is there a particular -- can you walk through
17 a particular method of calculation that could be used?
18 I understand generally what you said, but is there a way
19 that you can walk me through maybe not a concrete
20 formula but a method piece by piece that would enable
21 one to look at past attendance and try to extrapolate a
22 number or range of numbers?

23 A My best way of going around something like
24 that would be just to take a look at other ideal orgs
25 and what they're doing and compare that to Dunwoody's

1 history, extrapolating for those courses which we
2 currently don't offer due to no space, and just figure
3 out what an average -- what an average would be. It
4 would be similar to the parking study, you know. Like
5 this is typically what happens in an ideal org.

6 Q What advance preparations, if any, has been
7 done by Georgia Scientology to get ready for more space,
8 more staff, more course offerings in terms of planning?

9 A Well, there is a program, if you will, loosely
10 that's handed down from the CSI which helps an
11 organization to -- you know, I don't know if it's a
12 formal -- there are steps that can be taken. And they
13 have to do with putting the files in order and various
14 other preparatory steps that one can take if and when
15 the building is under renovation and it is imminent that
16 the move is going to happen and then these steps can be
17 taken to prepare the organization to move.

18 Q Okay. And so that normally would not be
19 something that was even undertaken until the building is
20 actually under renovation?

21 A I mean, yeah, because typically they would
22 involve some upset of the current op bases to prepare
23 you. And the one piece that is consistently worked on
24 is the keeping of the orderly files, you know. We
25 receive communications and letters from our parishioners

1 and we place them in files and we keep, you know,
2 records of -- treasury records and those kind of things,
3 which when you're shorthanded tend to be a little bit of
4 a difficulty to keep very orderly. So those kinds of
5 things can be prepared.

6 Q Okay. I want to go through some of the
7 interrogatory responses and ask you some follow-up
8 questions on some of these items. Some of these we've
9 already answered so we don't have to answer them again.

10 I understand that Scientology is moving toward
11 an ideal organization format.

12 A Mm-hmm.

13 Q Can you identify for me other categories
14 besides missions of existing Scientology facilities that
15 do not -- that are not ideal organizations?

16 A Well, there are the advanced organizations
17 which deliver the upper end of the bridge and there are
18 some -- there is an organization called the Saint Hill
19 Organization which is essentially a replica of the
20 original in the United Kingdom that service an upper end
21 of the bridge training-wise.

22 And then there are ecclesiastical corporations
23 at the upper end of the organizational structure which
24 are not really public facilities.

25 Q Are there also -- all those are upper end

1 things. Are there also levels of organization between
2 missions and ideal organizations that would be smaller
3 than ideal organizations?

4 A No.

5 Q Okay. Of the estimated 200 staff members at
6 the new location, what percentage of those would be
7 Auditors?

8 A That's a good question. I don't know,
9 actually. I have no idea what the complement would be
10 exactly.

11 Q Okay. Is it estimated that those staff
12 members will eventually be working full-time, more than
13 40 hours a week?

14 A It is assumed that they will be 40 hours a
15 week, at least 40 hours a week.

16 Q And is there likely to be volunteers also
17 serving in a staff capacity as well as paid workers?

18 A I would venture to say that in that complement
19 of 100 that would include whoever was paid staff and
20 whoever was volunteer staff.

21 Q Okay. And who put that complement of 100
22 together? Is that something that's handed down by CSI
23 as well?

24 A It's not a set in stone kind of a thing. It's
25 just kind of a number to shoot for just based on what

1 Hubbard did -- what Hubbard was able to accomplish in
2 old Saint Hill in the United Kingdom when he built the
3 first organization that actually was standard by church
4 guidelines.

5 Q Will Georgia Scientology permit use of its
6 building by groups that are not devoted to the
7 Scientology religion?

8 A The church will undoubtedly make itself
9 available for community meetings as any church would.
10 For instance, we were involved in some rotating
11 luncheons for the Mayor of Atlanta where once a month
12 there was a interfaith luncheon sponsored by one of the
13 churches in the area. So, or, you know, community
14 meeting places in the evening, let's just say the Boy
15 Scouts needed a place to meet or they wanted to come in
16 and learn about the organization, these kinds of things
17 would be permitted.

18 As far as use, no. I don't see there being
19 any other use of the building other than our church use.

20 Q Okay. Is it anticipated that CSI will make
21 any use of the Georgia Scientology building once it
22 relocates to Sandy Springs?

23 A No.

24 Q And just so I'm clear as to the question,
25 there are national churches that operate publishing arms

1 and things like that and may use local places to help
2 distribute some of their materials.

3 A Mm-hmm.

4 Q Is there any sort of anticipation that there
5 would be any kind of use like that of the Sandy Springs
6 facility?

7 A No.

8 Q Interrogatory number 11 identifies several
9 people by name, but it doesn't tell me who they are. So
10 I'm going to go through the list and ask you to give me
11 more specific information as to who they are.

12 And you were asked to identify people who are
13 related in any manner to the subject matter of the
14 lawsuit or who have knowledge about any of the relations
15 or any of the subjects of the lawsuit.

16 A Right.

17 Q You are the first person on the list. I know
18 who you are. Jeanne Reynolds?

19 A Jeanne Reynolds is a staff member of the
20 Church of Scientology International who is more or less
21 a legal liaison.

22 Q Okay. Allan, it's Ms. Allan Cartwright.

23 A That should be mister.

24 Q Mister. Mr. Allan Cartwright.

25 A He probably wouldn't like that.

1 Q I saw the "Ms." and I thought maybe I'll --
2 okay. Mr. Allan Cartwright.

3 A Same capacity as Jeanne.

4 Q Okay. Bob Adams?

5 A Bob Adams is the vice president of the Church
6 of Scientology International.

7 Q Colin O'Brien?

8 A Colin O'Brien. That must have been one that
9 Allan put in there. I don't personally know Colin
10 O'Brien.

11 Q Okay. What about Bob Wright?

12 A Bob Wright is the individual at CSI who is in
13 charge of the construction of all of the ideal
14 organizations.

15 Q Okay. Laurence Stumbke?

16 A She is the designer in charge of the ideal
17 organizations worldwide.

18 Q Gensler & Associates Architects?

19 A It's an architectural firm that has been
20 used -- I don't know whether there's a standing
21 agreement or not, but typically they've been used to
22 design the floor plans, the structure of all of the
23 ideal organizations to date.

24 Q Mr. Brian Fesler?

25 A Brian Fesler. He is with one of these

1 adjunctive companies. I don't recall his affiliation.

2 Q Sheila Ransbottom?

3 A Don't know her.

4 Q Fisher Associates?

5 A Don't know them either. These are probably
6 CSI connections --

7 Q Okay.

8 A -- directly affiliated with the ideal org
9 evolution. Oh, Brian Fesler. I do know Brian Fesler.
10 I kept saying that name. He is -- he holds my capacity
11 at the Nashville Church of Scientology.

12 Q Interrogatory number 14 sought information on
13 any photographs, videotapes, films, audio recordings
14 related to this lawsuit. And the response was, "There
15 may be additional photographs, videotapes or films
16 related to this civil action which were not covered and
17 will supplement."

18 Are you aware of any photographs, first of
19 all, related to this lawsuit that have not been produced
20 to us?

21 A Well, I'm not sure what photographs --
22 photographs of what particularly?

23 Q Well, related to the lawsuit. It would
24 probably be related to the building in Sandy Springs --

25 A Mm-hmm.

1 Q -- in some form or fashion.

2 MS. JONES: Did we send you the
3 Transwestern flyer?

4 MS. HENDERSON: Transwestern?

5 MS. JONES: That's mentioned in -- that
6 says it's photographs were in this Transwestern
7 flyer.

8 MS. HENDERSON: I don't think so.

9 MS. JONES: All right. I'll get that to
10 you.

11 MS. HENDERSON: I don't think we received
12 any photographs at all.

13 MS. JONES: Okay.

14 MS. HENDERSON: Other than this brochure
15 that you copied.

16 MS. JONES: I just gave it to you the
17 other day.

18 MS. HENDERSON: Yeah. You gave me
19 yesterday.

20 Q (By Ms. Henderson) What about videotapes. Are
21 you aware of any videotapes that are related to the
22 lawsuit?

23 A No. The only videotapes I know that were made
24 were during the zoning by people -- some people who are
25 involved in an Internet group. And they may or may not

1 have.

2 Q What about films. Are you aware of any films
3 that are related to the issues in this lawsuit?

4 A I don't know of any photographs or films that
5 would be pertinent to this issue at all.

6 MR. DILLARD: Off the record a minute.

7 (A discussion was held off the record.)

8 Q (By Ms. Henderson) Back on. Interrogatory
9 number 15 sought information on elements of damages,
10 amounts of damages being claimed by Scientology. What
11 is your understanding of how Georgia Scientology has
12 been damaged by the City of Sandy Springs?

13 A Well, assuming that I'm not an attorney and I
14 don't know if there's, you know, damages, by saying
15 damages it's a legal, specifically a legal issue, but
16 from my personal experience and observation I can tell
17 you that we are at long time in a rented space that we
18 wouldn't need to be in otherwise. That the building
19 sustained some damage from freezing pipes because it was
20 sitting unoccupied in January and we are now involved in
21 lengthy cleanup and insurance situation, trying to
22 repair that damage.

23 Obviously, we have attorney's fees and the
24 Kimley-Horn parking study investment. We've got half a
25 million dollars in space plans that are kind of in the

1 air on whether they can actually be utilized. You know,
2 it's been a huge inconvenience.

3 And if we wind up not being able to use that
4 building, then currently the building value is something
5 like, I don't know, I don't have an official number but
6 probably a half or two-thirds its original value if we
7 would have to relocate.

8 Q Was the building appraised before Georgia
9 Scientology bought it in 2005?

10 A I'm sure it was. I don't personally have the
11 appraisal.

12 Q Do you know if Georgia Scientology has a copy
13 of any appraisal from 2005 for the building?

14 A I don't think they do. I've tried to find
15 such an animal and have been unsuccessful. So but it
16 may be at CSI or there may have been -- I'm sure the
17 building wasn't bought without there being an appraisal
18 to hand in someplace or another.

19 Q In terms of the other elements of damages that
20 you have identified, if you would get any receipts that
21 you have showing expenditures to your counsel so that
22 she can produce them, that would be appreciated.

23 A Okay. No problem.

24 Q Interrogatory number 16 sought a list of
25 courses that would be offered at the Sandy Springs

1 facility by name and description and sought for each
2 course the maximum number of people permitted in that
3 course at any one time.

4 The response referred to a book "What is
5 Scientology?" pages 832 to 834, 846 to 848, 855 to 859
6 and 864 to 867.

7 A Assuming that's the same volume of book. It
8 may be a different volume.

9 Q It's a different book because this book ends
10 at page 737.

11 A Yeah. They were probably using the hardback
12 when the pages were found. Sorry about that. I could
13 certainly bring one. It never occurred to me I was
14 going to need to match the pages.

15 Q Well, and again I really am trying to get a
16 handle on what the prospective maximum occupancy is on
17 the building. The only way I know to do that is to try
18 to build it up from ground floor piece by piece.

19 A Sure.

20 Q And until I can get a handle on that, there's
21 no way to come up with a number.

22 A Yeah.

23 Q Can you take a look at the book that Andrea
24 brought in today and identify whether -- these pages
25 will be different but the sections that can be referred

1 to to try to answer the courses by name and description
2 as well as --

3 MS. JONES: I think there's an index.

4 THE WITNESS: Gosh. This overwhelms me
5 because it's just so not my area. I don't know all
6 the courses. You know, really, the simplest thing
7 that I can tell you is that we will be limited by
8 the space, clearly. We need a given number of
9 rooms and we have a minimum amount of space that's
10 required.

11 And the number of people -- this is it.
12 This is the minimum. This plan that we have here,
13 this 4400 -- 44,000 square feet, or whatever number
14 it is, is the minimum space that we can have that
15 will house all of the spaces that we need to
16 deliver our religion in the way that it has been
17 prescribed to us.

18 If you had -- some of our buildings are
19 60- or 80,000 square feet. So clearly if you had a
20 60- or an 80,000 square foot building and you had
21 an Academy that would hold a hundred people, then
22 that course would hold a hundred people.

23 We are not going to in this space, even
24 in the 44,000 square feet we have, are not going to
25 be able to house a hundred people in that room

1 because it's a small room.

2 Q (By Ms. Henderson) And that's fair, but then
3 the question is: How many people can be housed in the
4 room given the size of the room? I mean, it's a
5 question that it seems like there ought to be a way to
6 compute an answer given you've got a finite number of
7 space, amount of space.

8 A Right.

9 Q And I don't know how the space is arranged.

10 A Right.

11 Q You-all know how the space is arranged for
12 these courses.

13 A Right.

14 Q And if it's in tables, you know how much space
15 people need. I don't know that. I have no way of
16 computing that on my own.

17 A Mm-hmm.

18 Q So I'm asking for you to help me somehow get a
19 handle on that.

20 A Yeah.

21 Q And if what you're telling me is that the
22 numbers aren't limited by course per se but they're
23 limited by space, then it's helpful if you can give me
24 with this much space we would be allowed to put X number
25 of people. That would be helpful to me.

1 A Okay.

2 Q However we can do it, that's what I'm trying
3 to get at is in the facility that you're in with the way
4 it's designed, how many people would that hold if it
5 were used for --

6 A This. At its maximum.

7 Q Yes. Is that a number that you could put
8 together?

9 A I mean --

10 MS. JONES: Or would that be a number
11 that Bob Wright could put together?

12 THE WITNESS: He's probably more
13 qualified, but I mean somebody could probably take
14 a stab at saying, okay, this room will always be
15 empty unless it's occupied by someone who is
16 currently housed over here. Do you see?

17 Like we could take the spaces where, for
18 instance, in the rotation of the course rooms you
19 fill up that theory room and that's it. That's the
20 maximum capacity for all of the affiliated rooms
21 because if there's no more chairs left in the
22 Academy, then no one else is going to study in that
23 sector of the building.

24 Q (By Ms. Henderson) Okay.

25 A So you would say, okay, for this whole hunk of

1 building it would be however many people can fit in this
2 room right here with the tables and chairs that are
3 allowed in there. And maybe even on the floor plans it
4 can be discovered. But then there would be auditing
5 rooms.

6 It's extremely unlikely that every room that
7 could hold a person will actually have a person in it.
8 Like if the building will ever be completely maxed out
9 is just not real. Because the organization is very
10 fluid. We work in two-and-a-half-hour blocks mainly.
11 And it's a rotational thing. So there's a lot of
12 activity coming and going and it's never like you fill
13 up the building and it's full and then somebody is
14 waiting outside. It just doesn't work that way.

15 So, I mean, the realest thing would be to look
16 at the theory course rooms, those which are devoted to
17 theory, and count chairs that would fit in there.

18 Other than that, are the auditing rooms all
19 going to be full? I've never seen it in our top
20 organization, I have never seen every auditing room
21 available with somebody in it. Because they just are
22 rotating too much. Same thing with the "purif" area.
23 Same thing with the practical rooms. Same way with the
24 film rooms.

25 Today you might have six people who walk in

1 the building interested in Scientology and then it might
2 be three days and there would be no one. So it's just a
3 real difficult thing to nail down.

4 Q All you can do is give me the best answer you
5 can give me.

6 A We can take a stab at it I suppose, someone
7 can.

8 Q Well, what I'll probably do is I'll probably
9 try to supplement the interrogatories with two or three
10 more things that seek to have something broken down.
11 Then you-all can try to put something together that
12 would be responsive to that.

13 A Should I bring the hard copy so you can have
14 the pages?

15 MS. JONES: Whatever is the -- would be
16 the equivalent of what was referred to.

17 THE WITNESS: Well, there's some general
18 listings of the courses, right?

19 MS. JONES: Yeah.

20 THE WITNESS: But that's not going to
21 give her the information that she's after
22 particularly, other than how many courses are
23 there. But that's like how many stars are in the
24 sky, you know. There are many. And some of them
25 haven't had one person on them in months or years.

1 MS. JONES: I think that probably what
2 you were saying earlier about --

3 MS. HENDERSON: Rephrasing an
4 interrogatory?

5 MS. JONES: -- how many people can be in
6 the theory room, then for that area that's how many
7 people you would have.

8 THE WITNESS: Right. But then you have
9 things like the seminar room and even though the
10 seminar room would be available on a daily basis,
11 is there going to be a seminar booked into that
12 room every day? Highly unlikely. Every hour of
13 the day? Highly unlikely.

14 I mean, it's just so -- it just
15 vacillates so very much. But Hubbard demands that
16 you have the space there and available on demand so
17 that if you had two people who walked in to the
18 church and on this day there was no Dianetic
19 seminar scheduled and they wanted that Dianetic
20 seminar, that the guy who's responsible for
21 delivering that would show up in there and deliver
22 that seminar to those two people. It's an on
23 demand kind of religion.

24 Q (By Ms. Henderson) There aren't many of those
25 around.

1 A There are not.

2 (Defendants' Exhibit Nos. 8 & 9 were marked
3 for identification.)

4 Q (By Ms. Henderson) Miss Danos, I've handed you
5 two sets of documents that have been identified as
6 Defense Exhibit 8 and Defense Exhibit 9. Let's take 8
7 first.

8 A Mm-hmm.

9 Q I received this late last night. Actually,
10 it's a copy that was copied here this morning because I
11 was leaving as it was coming in last night. Can you
12 tell me what Defense Exhibit 8 is?

13 A This appears to be a somewhat vetted copy of
14 the Academy roll sheet and the Div 6 public roll sheets.

15 Q And tell me how that works. Can I come around
16 and stand behind you while you point? Will that bother
17 you?

18 A Yes. Certainly. No, it wouldn't. You'll
19 have to bear with me because this is not my invention.

20 Q I'll try not to breathe on you.

21 MS. JONES: Please.

22 THE WITNESS: Typically our week starts
23 on a Thursday at 2:00. Ends and starts on Thursday
24 at 2:00. So the roll sheet starts on a Thursday
25 after 2:00. So the first course is 4:00 o'clock of

1 the week. 4:00 o'clock on a Thursday.

2 And then they're broken down by course
3 period. So the next course is 7:00 o'clock
4 Thursday night. And then 9:45 Friday morning. And
5 on through the week by course slot.

6 Q (By Ms. Henderson) Okay.

7 A And then there's a list of all of the
8 attendees who are currently on a service. And then
9 there's a roll. There's a circle for that person's name
10 on every proposed course time that they are going to
11 attend.

12 Q Okay.

13 A So the way the supervisor knows if that person
14 is due on this day at this time is because there has
15 been a circle put on that square down the row from that
16 person's name.

17 Q Okay.

18 A And then they take roll.

19 Q Mm-hmm.

20 A And then they know who is keeping their
21 schedule and who needs to be called to find out if
22 there's something wrong.

23 Q Now, some of those have a checkmark over the
24 circle and some of them have an 'X.' Is there a
25 difference between the checkmark and the 'X'?

1 A I believe, and don't hang me if I'm wrong, but
2 I believe the checkmark means they're here and the 'X'
3 means they are not here.

4 Q Okay. As opposed to some circles just appear
5 to be left blank?

6 A Well, you're right now. The blank one means
7 not here. The 'X' may be late. So there's a
8 designation. There's an 'L' that says late. I actually
9 don't know what the 'X' means, then.

10 Q What is this last column that seems to have a
11 few comments in it?

12 A I don't know. Supervisor's notes. I have no
13 idea.

14 Q So this is a series for week-by-week of people
15 who are showing up or scheduled to show up?

16 A That's correct.

17 Q And is that an inclusive list of all the
18 people who are coming as students? Is students the
19 right word? Parishioners?

20 A This is inclusive of everyone who is currently
21 doing study in the Academy.

22 Q Okay.

23 A And then this list, these lists toward the
24 back that say Div 6 and staff --

25 Q Right.

1 A -- is a listing of just that. The new public
2 and the staff members who are on study.

3 Q Okay. All right. And then what is Exhibit
4 No. 9?

5 A Exhibit No. 9 is an accumulation of names and
6 contact information for Scientologists in our area who
7 might fall into the category of currently on study or
8 currently receiving counseling or auditing or having
9 recently bought a book perhaps or Scientologists in the
10 area who are on service at an upper organization but
11 come to our events. And so we capture these names at
12 event sign-in.

13 And then we keep those contact numbers and
14 invite them, continue to invite them back to future
15 events and/or make calls occasionally to find out if
16 they are ready to, you know, receive more counseling or
17 receive their next education.

18 Q All right. That gives me the list of names
19 that runs down the left side. Then what is the column
20 that has 'Xs' and 'maybes' in it?

21 A Well, this particular document was put
22 together at one of the upper organization events. This
23 was the American Saint Hill Organization --

24 Q Mm-hmm.

25 A -- that was coming to Atlanta to present their

1 curriculum, if you will, to our public. And so these
2 'Xs' and 'maybes' are indications by that group of
3 whether or not this individual was ready to move into
4 the next study series or potentially ready or not ready
5 or whatever other.

6 Q What would "CW" mean?

7 A I don't actually know.

8 Q Okay. What is the second column?

9 A I don't have any idea, actually.

10 MS. JONES: Let me make sure Michelle
11 didn't black out anything that would give you that
12 information.

13 THE WITNESS: I don't know what that
14 means. I don't really use these lists myself.
15 Something -- I can't read this. It may be some
16 notation on the phone call itself. I don't know.
17 Whether they were reached or not reached. I don't
18 know. Don't really know.

19 Q (By Ms. Henderson) Do you need to take a
20 break?

21 A I'm fine.

22 Q Okay. Request for production number 1 asked
23 for documentation regarding the amount of square footage
24 required in a Church of Scientology facility. Does your
25 organization -- is your organization in possession of

1 any documents that say what the physical requirements
2 are for an ideal org facility?

3 A I am not nor do I believe anyone at Church of
4 Scientology Georgia, we do not have such a document.
5 However, there are references to this in other
6 documents. And again, this is part of the overall
7 template, if you will, or part of the guidelines that
8 have been set forth by CSI as a result of their having
9 gone through all of the books and lectures and writings
10 of L. Ron Hubbard and gleaned these bits and pieces that
11 constitute what is an ideal organization.

12 MS. JONES: And I would say for the
13 record I have asked CSI to produce that and they
14 have told me that they are attempting to get that.

15 MR. DILLARD: While you're off the
16 record, Michelle said she can't find that brochure.
17 She's looked two or three times.

18 (A discussion was held off the record.)

19 MS. HENDERSON: I think that's all I
20 have.

21 MS. JONES: Okay. We will put on the
22 record that Miss Danos will reserve signature.

23 MS. HENDERSON: That's fine.

24 MS. JONES: She wants to read and sign
25 her deposition when it's done.

1 MS. HENDERSON: I'm sorry I didn't ask.

2 MS. JONES: That's okay. We'll get a
3 transcript too.

4 (The reading and signing of the deposition by
5 the witness was reserved.)

6 (Deposition concluded at 2:06 p.m.)

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1 ERRATA PAGE

2 Pursuant to Rule 30(e) of the Federal Rules of
3 Civil Procedure and/or Georgia Code Annotated
4 9-11-30(e), any changes in form or substance which you
5 desire to make to your deposition testimony shall be
6 entered upon the deposition with a statement of the
7 reasons given for making them.

8 To assist you in making any such corrections,
9 please use the form below. If supplemental or
10 additional pages are necessary, please furnish same and
11 attach them to this errata sheet.

12 _____ There are no corrections.
13 _____ Any corrections/additions are listed below.

14	PAGE/LINE	SHOULD READ	REASON
15	_____	_____	_____
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20		_____ DEBORAH QUINN DANOS	
21	Sworn to and subscribed before me		
22	this _____ day of _____, 2010.		
23	_____		
24	Notary Public		
25	My commission expires: _____		

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C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF COBB:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, that the witness was first duly sworn, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 126 represent a true, correct, and complete transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case. The witness reserved the right to read and sign the transcript.

Pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia and O.C.G.A. 15-14-37 (a) and (b), written disclosure is attached herein.

This, the 25th day of May, 2010.

Kimberly S. Bennett, CCR-B-1172

My commission expires the
20th day of January, 2011

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DISCLOSURE

STATE OF GEORGIA Deposition of: Deborah Q. Danos
COUNTY OF COBB: Date: May 19, 2010

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Bennett Reporting, Inc.

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This, the 25th day of May, 2010.

Kimberly S. Bennett, RPR, CRR, CBC, CCP
CCR No. B-1172