

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 ROBERT MICHAEL WRIGHT, 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 6th day of August, 2010, commencing at  
the hour of 10:02 a.m.

- - -

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18 Also present:

19 Neil Levin

20 - - -

21 (Pursuant to Article 10.B of the Rules and  
22 Regulations of the Board of Court Reporting of the  
23 Judicial Council of Georgia, the court reporter  
24 disclosure statement is tendered at the end of the  
25 transcript.)

1 MS. HENDERSON: This will be the  
2 deposition of Bob Wright taken pursuant to Notice  
3 and agreement of counsel for all allowable purposes  
4 under the Federal Rules of Civil Procedure. All  
5 objections except as to form of question,  
6 responsiveness of the answer and privilege are  
7 waived until first use. Is that acceptable?

8 MS. JONES: Yes.

9 MS. HENDERSON: I'm going to let you  
10 swear the witness.

11 ROBERT MICHAEL WRIGHT,  
12 having been first duly sworn, was examined and testified  
13 as follows:

14 EXAMINATION

15 BY MS. HENDERSON:

16 Q Mr. Wright, would you state your full name for  
17 the record, please.

18 A Robert Michael Wright.

19 Q And what is your current address?

20 A 1710 Ivar Avenue, Los Angeles, California.

21 Q And what is that ZIP code?

22 A 90028.

23 Q All right. Mr. Wright, have you been deposed  
24 before?

25 A No, ma'am.

1 Q All right. Well, we'll get used to each other  
2 as we're here. We're going to sit around the table as  
3 we are now. I'm going to ask you some questions. The  
4 purpose of my doing so is to obtain information about  
5 the case.

6 A Okay.

7 Q Some of my questions may be inartfully worded.  
8 That's not intentional. It's simply because I'm not  
9 familiar with Scientology. And so if I say something  
10 which is erroneously stated, please let me know that and  
11 we'll try to rephrase it into an acceptable form.

12 A Sure will.

13 Q You're doing well so far. It's important that  
14 you give me verbal responses to the questions. You're  
15 welcome to nod your head while you answer or shake your  
16 head, but the court reporter can't take that down.

17 A Understood.

18 Q And mm-hmm and huh-uh also are difficult to  
19 read in a transcript. So if you would try to keep it a  
20 little cleaner with yes, no, correct, something of that  
21 nature, that would be helpful.

22 A I will.

23 Q Okay. If at any time you don't understand my  
24 questions, please tell me and we will try to work  
25 through that so that you are comfortable that you know

1 what you are being asked. Is that fair?

2 A That's fair.

3 Q And by the same token, if you give me a  
4 response if it seems clear to me, I'm going to assume  
5 that that was your response to the question. Is that  
6 fair?

7 A Yes, ma'am.

8 Q All right. Is there any reason today why you  
9 would not be able to listen and respond to my questions  
10 accurately?

11 A No.

12 Q All right. Then let's get started.

13 A All right.

14 Q Who are you presently employed by?

15 A I'm actually a full-time volunteer of Church  
16 of Scientology International. I'm a staff member of the  
17 church.

18 Q Okay.

19 A Yeah.

20 Q How long have you been a full-time volunteer  
21 with Church of Scientology International?

22 A Well, I've been a full-time volunteer staff  
23 member of the Church of Scientology for about 20 years  
24 now. CSI itself for the last year actually.

25 Q And CSI is Church of Scientology

1 International?

2 A Yes. Prior to that it was -- I was based in  
3 Clearwater, Florida, for about 18 years.

4 Q Okay. And what does Church of Scientology --  
5 let's just say CSI because that's easier. What does CSI  
6 do?

7 A They're basically the ecclesiastical head in  
8 terms of hierarchy within the church structure itself  
9 and they're responsible for setting the strategy and  
10 strategic programs and so forth for Scientology as a  
11 religion.

12 Q Does CSI also serve as a monitoring function  
13 for local facilities?

14 A That's typically handled by the local, more  
15 the local management bodies itself. They don't manage  
16 directly the local organizations, but monitor, yes.

17 Q And who, what body, if any, is responsible for  
18 ensuring the accuracy or purity of what is done in a  
19 Scientology facility?

20 A That's -- well, again, it's done on a  
21 hierarchy-type echelon basis. Ultimately, yes, it would  
22 be Church of Scientology International. However, the  
23 lower level of management for a Class V organization  
24 known as a central liaison office really takes and  
25 implements and ensures locally that those intentions are

1 kept.

2 Q And what communication is there on a regular  
3 basis between CSI and a typical Class V organization?

4 A Not much, really. That's typically handled by  
5 the local management function.

6 Q Is there any arm of Scientology which is  
7 higher than CSI?

8 A Arm. That's kind of an interesting -- I'm not  
9 sure exactly. "No" to answer your question. Of course  
10 there's the Religious Technology Center but it's not  
11 part of the actual church itself. They hold the --  
12 ensure the purity of Scientology is kept and own the  
13 trademarks and servicemarks. But in terms of the  
14 structure itself, no.

15 Q And how is CSI organized?

16 A Wow. I'd have to show you probably, depict  
17 that a little bit. But I don't know if you have  
18 something there.

19 Q Let me withdraw that question. Let's mark  
20 this exhibit that I received and see if that helps.

21 (Defendants' Exhibit No. 10 was marked for  
22 identification.)

23 Q (By Ms. Henderson) Mr. Wright, I'm handing you  
24 what has been marked as Defense Exhibit 10 and I will  
25 represent to you that this was a document that was



1 received in response to our discovery request. Can you  
2 tell me what this document is?

3 A That's what's called a Scientology organizing  
4 board.

5 Q And in the upper left-hand corner it says  
6 Church of Scientology International. Is all of what is  
7 on this page a representation of how Church of  
8 Scientology International is organized, or is there  
9 something besides CSI on this page?

10 A There's some -- this is a typical Class V  
11 organization organizing board. CSI you can say it's  
12 organized in a similar fashion because it has an  
13 organizing board. But there's, you know, much different  
14 functions in CSI than is a typical classified  
15 organization.

16 Q What is this -- what is this Exhibit 10  
17 representative of?

18 A A typical organization of Class V church  
19 organization.

20 Q So any Class V church organization would have  
21 this organizational structure?

22 A Yes, ma'am.

23 Q And there are a number of sections on Exhibit  
24 10, for instance, qualifications Division 5. Each Class  
25 V organization would have a Division 5 included within

1 it?

2 A Absolutely.

3 Q And would it also have a Department 13, 14 and

4 15?

5 A Certainly.

6 Q So is it fair to say that each Division 5

7 organization would have all of the functions that are

8 listed on this Exhibit 10?

9 A Yes.

10 Q All right. At what point -- let me back up.

11 Do you know how many Scientology facilities of whatever

12 kind there are worldwide?

13 A Off the top of my head, no.

14 Q Do you have an estimate that you could give

15 me?

16 A Class V organizations?

17 Q Yes.

18 A I would say estimate 130.

19 Q And what other -- without going into numbers,

20 what other types of organizations are there within

21 Scientology other than Class V?

22 A Well, you have right below a Class

23 organization you have what's called a mission. And a

24 mission is basically like a mini-, mini-church. It's

25 not a church; it's called a mission. And that's one.

1 You'd have groups, Scientology groups which are even  
2 smaller. They can be a handful of people.

3 And then you have advanced organizations which  
4 are one step above a Class V organization. Once you're  
5 done with what you can deliver in terms of Scientology  
6 services in a Class V organization, you'd go to an  
7 advanced organization. That's what that is.

8 And that's really -- that's it in terms of  
9 Scientology organization delivering the technology of  
10 Scientology.

11 Q All right. Are you familiar with the current  
12 Scientology facility in Dunwoody, Georgia?

13 A Yes.

14 Q Is that Class --

15 A I'm sorry. Dunwoody, is that the -- I'm  
16 actually not totally familiar with this area. Is  
17 Dunwoody the existing or is that the new one?

18 Q That's the existing.

19 A Existing, no, I'm actually not. Sorry. I  
20 don't think I've even been there.

21 Q Do you know whether that Dunwoody facility is  
22 currently classified as a mission or as something else?

23 A It's classified as a Class V organization.

24 Q It is a Class V organization?

25 A Yes.

1 Q And do you know how long that Dunwoody  
2 location has been classified as a Class V?

3 A I actually don't. I could guess since it  
4 started, but I don't -- I actually don't know. I'm  
5 sorry.

6 Q Is there a particular size that is recommended  
7 for missions?

8 A No. We don't have a standard size mission.  
9 That, you know, would be something we'll develop at some  
10 point. But "no" to answer your question.

11 Q Is there an anticipation when a mission is  
12 established that it will eventually grow into a Class V  
13 organization?

14 A I'm sorry. Did you say is there a time --

15 Q No. Is there an anticipation.

16 A Oh, anticipation.

17 Q In general.

18 A Yes. Ideally, yes. It's expected that a  
19 mission -- not always but ideally would grow enough so  
20 that it could become a Class V organization, yes.

21 Q And the groups that you referenced, are those  
22 informal groups or are those groups that are actually  
23 managed by Scientology in some fashion?

24 A Yeah. They're managed groups. There's a  
25 specific division within CSI that actually deals with

1 groups.

2 Q And is there an average size for a group?

3 A It's hard for me to say. It's not really my  
4 area in terms of groups, but I could give you a guess.

5 MS. JONES: Don't guess.

6 THE WITNESS: I don't really know.

7 Q (By Ms. Henderson) Let me go as far as you can  
8 give me and then if you don't know, simply tell me you  
9 don't know. I'm just trying to get as much information  
10 as I can.

11 A Sure.

12 Q Would a group normally be headed by a person  
13 who is approved by someone within the Scientology  
14 system?

15 A I don't actually know, ma'am. I'm sorry.

16 Q Let me try to clarify the question this way.  
17 If a group of people who knew nothing about Scientology  
18 decided that they wanted to learn about Scientology and  
19 they decided to band together into what would informally  
20 be called a group, would Scientology recognize that as a  
21 group?

22 A Sure. I mean, it could be, but, again, I  
23 don't know the actual process of how a group gets  
24 inaugurated, if you will, or authorized as a group.  
25 It's not what I deal with.

1 Q Do you know where those groups meet?

2 A They typically would have a location that they  
3 set up as their group. It could be a office building  
4 somewhere. It could be, you know -- I don't know. It  
5 could be anywhere. Could be someone's house, I guess.

6 Q Okay. Going back to Exhibit 10 which is the  
7 organizational chart for a Class V organization. Within  
8 each of the departments that's listed here there are  
9 what appear to be a number of positions; is that  
10 correct?

11 A Sure. Yes.

12 Q And would each Class V organization be  
13 expected to have each of these positions filled that  
14 appears on Exhibit 10?

15 A No.

16 Q All right. How would a Class V organization  
17 determine how many of those functions have to be filled  
18 with personnel?

19 A Again, I don't typically get into the  
20 organization part in the staff itself. So I could give  
21 you to the best of my knowledge how that would be  
22 determined. But again, I build them. I don't staff  
23 them and so forth.

24 Q Okay. Well, then again trying to get to the  
25 extent of your knowledge and clarify when you have

1 reached that limit.

2 A Sure.

3 Q With Executive Division 7 it indicates there  
4 is a secretary over that division. Do you know if that  
5 secretary would be required?

6 A Sure. It would be, yes.

7 Q And then there is Department 2 which is office  
8 of LRH?

9 A Mm-hmm.

10 Q What is LRH?

11 A That's L. Ron Hubbard, the founder, yes.

12 Q Then there would be someone filling that  
13 office; is that correct?

14 A I'm sorry. Would you mind just pointing out  
15 to me which Department -- oh, right here.

16 Q Starting at the --

17 A Right. You'd have the LRH communicator here  
18 and that function would be held.

19 Q There might be more people within that  
20 Department 21 than just the communicator, but you would  
21 have a communicator; is that correct?

22 A Yes. Yeah. I mean, typically -- typically  
23 no. I mean, this LRH communicator here would really  
24 handle all these functions. You'd have -- you see this  
25 establishment office branch? You'd have an

1 establishment officer, you know, typically. You'd  
2 have -- typically you'd have a Flag representative.  
3 You'd have a Flag banking officer. Those would be -- in  
4 that department those would be the typical functions.

5 Q What I'd like to do is to go through this  
6 chart and have you do the same thing with the other  
7 departments that you have just done with Department 21  
8 just so that we can get some feel for the number of  
9 positions that would be in an average Class V org.

10 In terms of Department 20 which is Department  
11 of Special Affairs, what personnel would be associated  
12 with that department in a typical Class V org?

13 A Typically just the head of it. Actually,  
14 where is that? Well, it's supposed to be director of  
15 special affairs. Here we go. Typically just that.

16 Q What about Department 19, the Office of the  
17 Executive Director?

18 A Well, you have the executive director no  
19 doubt. You would usually have the HCO executive  
20 secretary. The org executive secretary you would have.  
21 Public executive secretary.

22 MS. JONES: Mr. Moxon would like to take  
23 a brief break?

24 MS. HENDERSON: Okay.

25 MS. JONES: He wants to ask something



1 about this chart.

2 MR. MOXON: Can we just take a two-minute  
3 break.

4 MS. HENDERSON: Sure.

5 (A recess was taken from 10:18 to 10:21 a.m.)

6 Q (By Ms. Henderson) We're back on. In terms of  
7 Department 1, what does Department 1 do?

8 A That deals with personnel, getting new staff  
9 and so forth typically, mainly. Not typically but  
10 mainly that's what they deal with.

11 Q And what does Department 2 do?

12 A It's communications. They handle the internal  
13 communications of the organization, the outgoing  
14 communications, you know. A staff member writes what we  
15 call it a dispatch. It's simply a letter to another  
16 staff member that gets routed. That person is  
17 responsible for that, any mail going out, things like  
18 that.

19 Q What about Department 3, what is its function?

20 A They handle the ethics of the organization,  
21 make sure that the organization and staff members remain  
22 in ethics, adhere to the policies and so forth of the  
23 founder.

24 Q What about Department 4, what is their  
25 function?

1           A     Promotion marketing. They would be  
2 responsible for promotion of Scientology to the public.

3           Q     Within the context of their organization; is  
4 that correct?

5           A     Yes.

6           Q     What about Division 5 -- Department 5?

7           A     Department 5. Publications. Again, I'm not  
8 an organizational expert, but I know I've been around  
9 for a while. Publications. So they handle books.  
10 Books. Book stocks of the founder's materials, make  
11 sure those are in stock and able to be, you know, given  
12 out, so forth.

13          Q     What about Department 6?

14          A     Department 6, registration, they would  
15 basically sign up new members for courses and counseling  
16 and so forth.

17          Q     What about Department 7?

18          A     Department 7, that's department of income.  
19 They would basically collect, you know. Registrar, so,  
20 you know, you get signed up, you have an invoice, so  
21 they're going to enroll in a course, you would go to the  
22 cashier and so forth and pay for the course. They  
23 collect the funds, basically.

24          Q     Department 8, what is their function?

25          A     Disbursements. They would -- you know, they

1 disburse any funds, paying bills and so forth from the  
2 organization.

3 Q Department 9's function?

4 A They would basically keep the records and  
5 materials and in charge of the assets, basically. Keep  
6 the records, the financial records.

7 Q What about Department 10?

8 A Technical services. They are basically  
9 responsible for servicing the technical aspects. I'll  
10 give you an example. Auditing, counseling, which you  
11 probably heard the term "auditing" already. They would  
12 make sure that the Auditors or counselors have the  
13 materials they need to deliver. Auditing. They would  
14 service those individuals essentially. Yeah.

15 Q Was that 10 or 11?

16 A That was --

17 Q I've lost track.

18 A That was 10. That was 10. For example, I'll  
19 give you an example here. Well, let's see, you have a  
20 tech page. Now, that tech page is responsible for  
21 actually connecting up the person receiving the  
22 counseling. They would make sure that person is  
23 available, gets them in, gets them connected up with the  
24 counselor and so forth. So they're servicing those  
25 people.

1 Q Okay.

2 A Yeah.

3 Q What does Department 11 do?

4 A Department training. So they would be  
5 responsible for all the courses you have that are  
6 delivered in this division, Division 4. That department  
7 would be responsible for delivering those courses or  
8 classes, if you will.

9 Q Okay. And what about Department 12?

10 A And that's processing. And that department  
11 handles the actual, the counseling, the auditing itself.

12 Q Is it fair to say that the length of functions  
13 in each of these departments is not necessarily  
14 reflective of the number of people in each department?

15 A Yes, ma'am. That's correct.

16 Q And is it fair to say that if someone works or  
17 volunteers, for instance, in Department 10 that they  
18 stay within Department 10 only?

19 A Yes. That's correct. I mean, once they're --  
20 yeah. Once a person is posted within a department, you  
21 know, you could cross within a division occasionally or  
22 hold a function, but you would never cross over into a  
23 division, you know, but typically you got a person in a  
24 post or a department, they would stay in that  
25 department, yes.

1           Q     The next one is Department 12 which says  
2 department of processing. That's the second department  
3 of processing. This is 12-2.

4           A     Let's see that one. That's probably just  
5 the -- it's just another department. Sometimes you  
6 have -- if you've got two HGC, which is Hubbard Guidance  
7 Center which delivers the auditing, sometimes you'll  
8 have two departments for that. Two HGCs. That's what  
9 that would be.

10          Q     Do those two departments deliver auditing  
11 services in a different manner from one another?

12          A     No.

13          Q     Or it's just more people and therefore they're  
14 divided?

15          A     Yeah. Exactly.

16          Q     What about Department 13, what do they do?

17          A     Well, the whole qualifications division, they  
18 are responsible for ensuring that the technology is  
19 delivered properly within the organization of  
20 Scientology. Technology and the validity department  
21 basically ensures that that happens.

22                     You've got -- let's see. They give what you  
23 see examinations and so forth in here. They'll give, as  
24 an example, after an auditing session, what we call it,  
25 that person will see the examiner. And they'll get

1 what's called an exam, after-session exam.

2           And that exam basically ensures that that  
3 auditing session was delivered correctly. So that whole  
4 function of qualifications to make sure that the  
5 technology of Scientology is delivered correctly.

6           Q    Okay. And that would pertain to validity,  
7 enhancement and correction that they all work  
8 interchangeably?

9           A    Yes.

10          Q    Or interdependently?

11          A    Yes. Well, I mean, they've all got their  
12 individual functions, but as a whole that's what they're  
13 supposed to do because, say, you get over into  
14 correction and, you know, say that something did go  
15 wrong, and, you know, it was not the best auditing  
16 session in the world. So the correction department  
17 would make sure that that gets handled and corrected.

18          Q    Okay. What does Department 16A do?

19          A    Okay. This is getting in public division. So  
20 they would be -- haven't looked at this for a while. So  
21 they'll get books out to new people, basically.

22          Q    So about Department 16B?

23          A    Okay. So the department of body routing. So  
24 they would basically again be out getting new people,  
25 new public routed into the organization, basically.

1 Q Does that mean that the people in 16B are  
2 working outside the facility bringing people to the  
3 facility or doing some sort of outreach in some other  
4 form?

5 A Yes. Mm-hmm.

6 Q Okay. Do they also maintain offices within  
7 the facility in Division 16B?

8 A Yeah.

9 Q Department -- or rather Department 16B. What  
10 does Department 16C do?

11 A Sorry. I haven't looked at it for a while.  
12 Okay. Again, this is more public contact. More  
13 reaching out. Reach out type actions to new people,  
14 letting them know about Scientology, basically.

15 Q Okay. If someone who knows nothing about  
16 Scientology walks into a Scientology facility, is it the  
17 public contact division that meets that person and  
18 orients them and does something with them?

19 A Yes. And that's where you have like, you  
20 know, you have a whole gallery of displays in one of our  
21 churches, audio-visual displays that will show anything  
22 about Scientology, all of our programs and so forth.  
23 That person can come in and see anything about it.

24 Q Okay.

25 A Basically, yeah.

1 Q Moving then to the public servicing division  
2 which is 6B, starting with Department 17A, what does  
3 that department do?

4 A Okay. So, yeah, this is public registration.  
5 And different from the Division 2 registration which I  
6 covered earlier, these people deal with new people.  
7 Where the Division 4 registrars deal with existing  
8 parishioners. Getting them signed up for new services.  
9 These people sign new people up.

10 Q Okay.

11 A Yeah.

12 Q So does public servicing Division 6B interact  
13 with public contact Division 6A or do they operate  
14 separately?

15 A Well, I mean, they're separate. But, you  
16 know, they would interact. If you get new -- if they  
17 contact new people, they would obviously get them over,  
18 routed over to these guys. So they could actually sign  
19 them up.

20 Q What does Department 17B do?

21 A Hubbard Dianetics Foundation. Looks like  
22 they're dealing strictly with -- again, I'm not -- this  
23 isn't my area. But anyway, they deal with Dianetics,  
24 delivery of Dianetics services. Yeah.

25 Q Department 17C, what is their function?



1           A     Okay.  So these guys deliver the Division 6  
2 introductory courses of Scientology.

3           Q     Okay.

4           A     Yeah.

5           Q     So there are people who would work at  
6 attracting people to Scientology, there are people who  
7 would work at signing people up once they walk in the  
8 door?

9           A     Yes.

10          Q     And there's another set of people who would  
11 work with them in terms of introduction to Scientology?

12          A     And the delivery of the courses.

13          Q     And the delivery of the courses.  Okay.

14          A     Precisely.

15          Q     What is Department 17D's function?

16          A     So that's the department of the chaplain.  And  
17 the chaplain would be functions of a chaplain.

18          Q     Okay.  Division 18A -- or Department 18A, what  
19 does it do?

20          A     It says public relations.  You know, deal with  
21 any public relation activities for the church.

22          Q     Department 18B, what is their function?

23          A     Clearing.  This department they basically --  
24 it's a little complex.  But you've got what's called in  
25 here field staff members.  And these guys are not staff

1 members within the church per se. In other words, they  
2 don't hold a position within the organization. They  
3 don't have a space necessarily or a desk or anything  
4 like that. But they're actually parishioners who help  
5 disseminate Scientology out in the field, if you will.  
6 That's what they do.

7 Q It's Department 18B where those people fit; is  
8 that what you are saying?

9 A Yes.

10 Q And then what does Department 18C do?

11 A That's the department of success. And once a  
12 person has completed a Scientology course or auditing  
13 action, they will go and basically write a success story  
14 and this kind of thing. That's what this department  
15 deals with. It also deals with other groups, you know,  
16 outreach groups and so forth in the field.

17 Q So in terms of a Class V organization -- and  
18 I've heard the word Class V ideal organization. Is  
19 there a difference between a Class V organization and a  
20 Class V ideal organization?

21 A Yeah. There is a big difference. The only  
22 difference is a Class V organization is a Class V  
23 organization. But the difference is obviously a Class V  
24 ideal organization is set up to properly deliver all of  
25 Scientology, where we have several that are not. Thus,

1 we have a huge program going to do that, accomplish  
2 that.

3 Q Okay. We'll get back to the Class V ideal  
4 orgs in a minute. With respect to the functions that  
5 are on this Class V chart that's been identified as  
6 Defendants' Exhibit 10, would all of those functions be  
7 expected to be handled at the Sandy Springs Scientology  
8 facility?

9 A Yes.

10 Q And when I say Sandy Springs Scientology  
11 facility, I'm referring to the facility on Roswell Road  
12 in Sandy Springs that's the subject of this lawsuit.

13 A Yes.

14 Q Okay.

15 A Yes.

16 Q All right. And these functions that are  
17 identified on Exhibit 10 with the exception of what  
18 field staff members do, are these functions all handled  
19 internally within the building at some location?

20 A It's hard to answer that one. I only say that  
21 is because -- "yes" to answer your question. But, you  
22 know, there's activities that happen outside of the  
23 organization as well. But for the most part yes.

24 Q Okay. Let me try to be a little bit more  
25 specific and break it down a little better.

1 A Okay.

2 Q Would people who hold the positions that form  
3 these functions in Exhibit 10 physically be housed  
4 within the Scientology building?

5 A Yes, ma'am.

6 Q Okay. And would most of them have space,  
7 either office space or classroom space that they're  
8 assigned to within that building?

9 A Yes.

10 Q Field staff members would not have space  
11 assigned to them; is that correct?

12 A Yeah. That's correct. But they usually  
13 have -- there's usually at least one meeting area that's  
14 designated for them. 'Cause there's a person in the  
15 organization called the field staff member in charge and  
16 that is an actual staff member that's, you know, posted  
17 within the organization. And that person, you know,  
18 deals with those field staff members. And they'll  
19 occasionally come in and meet with them and so forth.  
20 Yeah.

21 Q All right. And I'm assuming that Scientology  
22 uses the Internet and other computer communications with  
23 the outside world; is that correct?

24 A Sure.

25 Q And you would expect someone in a Class V

1 organization to be using computers in a way to reach  
2 people in the outside world; is that correct?

3 A Sure.

4 Q And is it also fair to say that the church  
5 that is intended for Sandy Springs would in particular  
6 be reaching out to people throughout the state of  
7 Georgia, if you know?

8 A Yeah. I mean...

9 Q I'm not meaning to be tricky. Deb Danos  
10 testified that this church will be the only church in  
11 Georgia.

12 A Oh, that's -- that's not necessarily true at  
13 all.

14 Q That's not true?

15 A No. No.

16 Q Okay.

17 A Really, you know, this is kind of a starting  
18 point you might say for Georgia. And, you know, the  
19 whole object, you know, we can say this will be like,  
20 you know, the first main organization in Georgia. And,  
21 you know, part of their function will be to open up new  
22 missions and new groups, you know, all over which will  
23 eventually then become Class V organizations. So  
24 that's, you know, that's part of their function.

25 Q I understand with the classification. You

1 worded that much better than I did, so thank you.

2 A Okay.

3 Q But at the present time the Dunwoody facility  
4 is anticipated to be closed with everything moved to the  
5 Sandy Springs facility; is that correct?

6 A Yes, ma'am.

7 Q And then over time it's anticipated there  
8 would be additional organizations in Georgia?

9 A Sure. Yes.

10 Q Okay. Do you know if there are other groups  
11 presently operating within Georgia?

12 A You know, I don't. I mean, I would -- hate to  
13 assume, but I would assume so, yes. But I don't  
14 personally know.

15 Q Who would be the person who would have the  
16 best knowledge of that information?

17 A That would be someone who I couldn't even name  
18 a name. But that would be someone who deals with  
19 missions and groups. And we have in CSI a group -- it's  
20 not group. It's part of the management structure which  
21 is called Scientology Missions International. And you  
22 also have what's called IHELP International who handles  
23 the groups. Scientology Missions International deals  
24 with missions. They would know.

25 But, you know, factually the local

1 organizations should -- Deb should probably be able to  
2 tell you. The local organizations, they would probably  
3 know if there's other missions or groups in the area.

4 Q Would CSI anticipate that a Class V  
5 organization would keep track of what's going on within  
6 a certain geographic area --

7 A Yes, ma'am.

8 Q -- in the name of Scientology?

9 A Yes.

10 Q And so if ultimately there's a second Class V  
11 organization, then it's likely that that geographic area  
12 would be divided between two and then maybe three as we  
13 go down the road; is that correct?

14 A Yes. That's -- yes.

15 Q So the Georgia facility as it now exists  
16 should be knowledgeable about any Scientology groups  
17 operating in Georgia?

18 A They should be.

19 Q Is that what you are telling me? And would  
20 they also -- should they be familiar if there are any  
21 other missions operating in Georgia --

22 A Yes. They should.

23 Q -- at the present time?

24 A They should most likely know that.

25 Q And if those were -- if either missions or

1 groups were started within Georgia say within the next  
2 two years, that Georgia Class V org should be aware of  
3 those activities; is that correct?

4 A Yes. Mm-hmm.

5 Q Would that Class V org have a monitoring  
6 function with respect to those activities?

7 A Again, that's in terms of the management and  
8 so forth, that's really not of the organizations.  
9 Again, I build them. But so it's hard for me to answer  
10 that question. So I can't really give you a good answer  
11 for that.

12 Q Okay.

13 A You know...

14 Q Fair enough. Your attorney doesn't want you  
15 to guess and I don't really want you to guess either.

16 A There you go.

17 Q Trying to find which way is right side up. I  
18 think it's this way.

19 (Defendants' Exhibit No. 11 was marked for  
20 identification.)

21 Q (By Ms. Henderson) Mr. Wright, the next item  
22 I'm going to show you has been marked as Defense Exhibit  
23 11. This also was provided to me by your attorneys.  
24 And I'm going to ask you if you can tell me what this  
25 is. Take your time. Look over as much as you want to.





1           while you look and then we'll just stand here and  
2           you can look over it.

3                       (A recess was taken from 10:43 to 10:51 a.m.)

4           Q       (By Ms. Henderson) Mr. Wright, can you tell me  
5 what Exhibit 11 is?

6           A       I've never seen that document, but it looks  
7 like to me from looking at it, it looks like an example  
8 of what the different functions that you would typically  
9 have in a Class V organization based on that organizing  
10 board that we went through.

11          Q       Okay. And then we have two other exhibits. I  
12 apologize, but I don't normally do depositions where  
13 people have to stand throughout.

14          A       I don't mind. I actually prefer to stand once  
15 in a while. I guess, you know, sitting down gets a  
16 little much.

17                       (Defendants' Exhibit Nos. 12 & 13 were marked  
18 for identification.)

19          Q       (By Ms. Henderson) Mr. Wright, I'm showing you  
20 now what has been marked as Exhibit No. 12. And can you  
21 tell me what this is?

22          A       Yes. Again, that looks like basically a  
23 typical -- or an example of a layout of the different  
24 functions within a Class V Scientology organization.

25          Q       All right. Does this -- is there within --

1 let me back up.

2 You said that you build new Scientology  
3 facilities; is that correct?

4 A Yes, ma'am.

5 Q Are you involved in the design of those  
6 facilities?

7 A No, ma'am. I'm not.

8 Q Who does the design of those facilities?

9 A Our architect Gensler does the designs. And  
10 that's headed by a staff member who works with me. Her  
11 name is Laurence Stumbke. She is the senior designer  
12 for the church.

13 Q And do you know if in designing a Scientology  
14 facility there are standards that have to be met for a  
15 Class V organization?

16 A It depends on what you mean by "design." When  
17 you design or -- or is that part of the planning and  
18 design? If it's purely design, in other words, like the  
19 colors and this kind of thing --

20 Q Let me give you a better question.

21 A Okay.

22 Q 'Cause I'm not talking about interior design.

23 A Okay. Good.

24 Q I'm talking about functional design.

25 A Okay.

1 Q That would be the breakdown of rooms, the use  
2 of space within those rooms.

3 A To answer your question, yes. I'm sorry.

4 Q Who would do that functional design?

5 A Okay. That is done -- well, the main person  
6 who does that is Laurence Stumbke. And she's -- that's  
7 one of the functions she does.

8 Q And have there been materials developed by CSI  
9 that would show what the optimum functional use of a  
10 space has to be to meet the tasks that a Class V org  
11 should meet?

12 A Yes.

13 Q All right. And looking at Exhibit 13 [sic -  
14 referring to Exhibit 12], is this an example of a  
15 spacial occasion by function for various departments  
16 within the Class V organization?

17 A That's what it looks like to me, yes. Again,  
18 you know, I think it's an example of that. You know,  
19 obviously we have many different churches around the  
20 world that are different sizes, as I'm sure you've seen.  
21 Some are 70,000 square feet. Some are 80, some are 40.  
22 So, you know, these things will obviously change in  
23 ratio to some degree. But it looks like an example of  
24 that, yes.

25 Q Okay. So if we look at Department 12 on the

1 far end of Exhibit 13 [sic - referring to Exhibit 12]  
2 and at the top it says auditing room, does that look  
3 like a typical detail for how auditing rooms would be  
4 set up?

5 A Yes, ma'am.

6 Q And then the center portion of that panel  
7 shows a series of rooms, auditing rooms layout; is that  
8 correct?

9 A Yes.

10 Q And then the bottom of that same panel shows  
11 what?

12 A This one here?

13 Q Yes.

14 A That is -- okay. So this -- the case  
15 supervisors. That's like a setup for them. They  
16 basically monitor and ensure that what is being  
17 delivered is being done correctly, basically.

18 Q Okay.

19 A Yeah. They're part of -- yeah. That's right.

20 Q And also within Division 10 we have D of P at  
21 the top. Do you know what that stands for?

22 A Sure. That's director of processing.

23 Q Okay. And that's an office for that person?

24 A Yes.

25 Q And then HGC Auditor Admin and Rec, what is

1 that?

2 A That's basically a location for these Auditors  
3 to come after they're done with their auditing session.  
4 And they're taking notes and so forth during the  
5 session. And they come and basically write up, do any  
6 last write-ups of the auditing session in that space.

7 Q Okay. And then we have an HGC waiting lounge.  
8 Who would wait in that waiting lounge?

9 A The people who would be receiving the  
10 auditing.

11 Q Okay. So they're simply waiting for their  
12 spot to open up or their time slot to open up; is that  
13 correct?

14 A Yes, ma'am. Yes.

15 Q And then at the bottom of that there's a  
16 purification program area. What is that?

17 A That is one of the programs, one of the  
18 beginning programs in Scientology called the  
19 purification rundown. And that is a -- if you want a  
20 better explanation of what that is, I can give that to  
21 you. But that is a space allocated for the delivery of  
22 that service.

23 Q Okay. And looking at Exhibit 13 -- was that  
24 12?

25 A That says 12.

1 Q If you can correct that to this conversation  
2 has been about Exhibit 12.

3 Now we're going to look at Exhibit 13. Can  
4 you tell me what Exhibit 13 appears to be, what Exhibit  
5 13 is?

6 A Yeah. This looks like again another exemplary  
7 sheet for this division, Division 6B, for the functions  
8 that are in that division.

9 Q Okay. Now going back to Exhibit 11 which was  
10 much smaller type but appeared to be all divisions of  
11 the organization, Exhibit 11 includes some areas that  
12 are not shown on 12 and 13; is that correct?

13 A This is 13. 6B. I'm trying to compare here.

14 Q This is 6B.

15 A Mm-hmm.

16 Q We have -- in fact, these aren't even complete  
17 for 6B.

18 A It looks like it, yeah. I'd have to literally  
19 sit down, compare like that one versus that one and see  
20 if there's anything...

21 Q These are not labeled in any manner to tell us  
22 what they pertain to or where they come from; is that  
23 correct?

24 A You mean in terms of the source of who  
25 wrote --

1 Q In terms of whether they are unique to the  
2 Sandy Springs facility or if they're general guide for  
3 all Class V orgs.

4 A No. It looks like an example to me.

5 Q Who would know what these are?

6 A The actual people who do the space plans,  
7 basically.

8 Q That would be Laurence Stumbke?

9 A Laurence would, yes.

10 Q And the architect?

11 A Mm-hmm.

12 Q What is the architect's name?

13 A That's -- well, Gensler works with us as an  
14 architect. Yeah. They're not the only architect we  
15 use. But they're one.

16 Q Do you know in terms of space planning for the  
17 Sandy Springs facility whether these Exhibits 11 through  
18 13 were utilized in planning the layout and use of that  
19 facility?

20 A I don't. I mean, again, I don't do the space  
21 planning. I can give you my guess as to the answer to  
22 that question. But again, I don't do the plans, so I  
23 couldn't answer that.

24 Q Let me ask you this question then: Exhibit 13  
25 contains two different layouts for assembly areas. The



1 top says chapel furniture and event storage, auditorium,  
2 event setup, 196 seats. The drawing directly under that  
3 on Exhibit 13 has the same heading but it also says 196  
4 seats. But there appears to be a difference in the  
5 seating between the two charts; is that correct?

6 A Yes. Yes, ma'am.

7 Q Is there a standard when you are planning a  
8 Class V org for how much seating should be in the  
9 chapel?

10 A Not that I'm aware of, no.

11 Q How would a space planner or an architect know  
12 where to start in terms of how large a chapel should be?

13 A That's a good question. One I couldn't  
14 answer, unfortunately, because I'm not the space  
15 planner.

16 Q Okay.

17 A Yeah.

18 Q And what does -- what is Miss Stumbke's  
19 position title?

20 A She's a senior designer is her title.

21 Q All right. In terms of the number of rooms  
22 available for auditing which is shown on -- what number  
23 is that Exhibit? 12?

24 A It's 12, yes.

25 Q 12. Is there any standard within Scientology

1 to your knowledge for how many auditing rooms have to be  
2 included in a Class V org?

3 A Really, you know, you'd have to take the  
4 different policy letters of our founder and take those  
5 as a culmination which would essentially tell you what  
6 you need in terms of the size of an HGC which is  
7 essentially the auditing to use that as a standard.

8 Q Is there any ratio that you know of between  
9 the number of auditing rooms and the number of classroom  
10 seating spaces?

11 A No.

12 Q Are there Class V orgs that -- let me ask it  
13 this way. In terms of Class V orgs that are currently  
14 existing, what is the overall square footage of those  
15 Class V orgs, the range from lowest to highest?

16 A Wow. Don't actually know. I mean, of course  
17 I know square footages of buildings. But again, we're  
18 on a whole massive program to get new Churches of  
19 Scientology which again we call ideal organizations.

20 So I'd say 90 percent or even more of our  
21 existing churches are not of the correct size, which is  
22 why for the last five, six years we've been purchasing  
23 new buildings.

24 So I don't -- I don't -- you know, I'm sure I  
25 could get, you know, something or I could find out the

1 range, but I'm -- you know, I've seen -- I've seen some  
2 15,000 square feet, you know, which is why we're getting  
3 new ones.

4 Q Okay. You testified a little while ago that  
5 there is a difference between a Class V org and a Class  
6 V ideal org. What is that difference?

7 A The difference is the way it is set up. And  
8 purely an ideal Class V organization holds and houses  
9 all of the functions according to the Scientology  
10 scriptures and is able to actually deliver all of those  
11 functions and services of a Scientology church.

12 If you will, for lack of a better term, a  
13 regular Class V organization -- actually it's not  
14 regular. But before it's an ideal organization it  
15 doesn't have that because it's not set up to do that.

16 Q All right. When did the concept of a Class V  
17 ideal organization come into being?

18 A Originally by the founder whenever he wrote  
19 his policies on a Scientology organization. In terms of  
20 implementing that, later. But originally then, sure.

21 Q In terms of CSI, was there a point in time at  
22 which CSI said, Any future churches we build are going  
23 to be ideal orgs?

24 A Yes.

25 Q And what was that point in time?

1 A That was somewhere in 2003.

2 Q And when that decision was made around 2003  
3 that all future churches would be designed and built as  
4 ideal orgs, what standards were in place governing the  
5 space requirements for an ideal org?

6 A There weren't any, ma'am.

7 Q Okay. And as we sit here today, are there any  
8 space requirements for an ideal org?

9 A Absolutely.

10 Q And tell me when those developed.

11 A They -- over a course of time. Say, like, on  
12 what date, you know, I'd say starting beginning 2003  
13 Tampa was our first pilot ideal organization. Much too  
14 small. But again, we didn't have any standards  
15 developed at that time.

16 So, you know, starting with that and over the  
17 course of the next four years or something like that is  
18 when the whole program and standards and requirements  
19 were developed.

20 Q So is it fair to say that when CSI decided  
21 that new facilities would be built as ideal orgs there  
22 was a period of time when you tried out various concepts  
23 and you learned from those concepts?

24 A Yes, ma'am.

25 Q And then at some point you became fixed with

1 this is our minimum standard for an ideal org; is that  
2 correct?

3 A You mean in terms of size?

4 Q In terms of size right now.

5 A Yeah. I would say that's correct, yes.

6 Q And when would that period of time have been  
7 when the size of an ideal org was fixed?

8 A You know, I don't personally know because,  
9 again, I wasn't involved in those initial developing  
10 steps and so forth. But so I'd have to guess in terms  
11 of, like, what year or what time period. 'Cause I  
12 really I don't know that.

13 Q I'm not trying to put words in your mouth, but  
14 I'm trying to narrow down the time frame.

15 A Sure.

16 Q We started in 2003 where you-all are feeling  
17 your way along.

18 A Yes.

19 Q And that process continues for about four  
20 years, which would bring us to around 2007 which would  
21 be around three years ago.

22 Have the standards for a size of an ideal org  
23 been fairly fixed for the last three years?

24 A Again, I've been -- I've been working on the  
25 Class V organizations for about two years. So it's hard

1 for me to answer that because I really don't know.

2 Q In the two years that you have been working  
3 with Class V orgs, are you operating under any standard  
4 for how much space -- if CSI wanted to develop a new  
5 Class V org somewhere today.

6 A Yes.

7 Q How much space in a building would CSI be  
8 looking for?

9 A I would say at absolute bare minimum about  
10 40,000 square feet.

11 Q And I also read somewhere that an ideal org --  
12 ideally you'd like to have 60,000 square feet; is that  
13 correct?

14 A You know, in terms of space planning, if you  
15 got a bit more space it's probably obviously easier to  
16 space plan it, you know, and to get in a range of, you  
17 know, I don't know, 50, 55, 60, 65, in that range is  
18 probably easier to space plan. So yeah.

19 Q As we sit here today, is there any standard in  
20 writing that's been firmly fixed as to a minimum size  
21 for an ideal org?

22 A In writing?

23 Q Mm-hmm.

24 A I mean, not that I have -- I'm sure there has.  
25 Yeah. I mean, I don't know that I've seen a specific

1 written document saying you must have, you know, X  
2 amount of square feet. But that is the program. That  
3 is what we operate on.

4 Q Who makes the decision as to whether an  
5 existing building is sufficient to be used for an ideal  
6 org?

7 A There is a -- it's called the building  
8 investment committee. I'm part of that. And  
9 essentially what will happen is you've got the local  
10 church, we even use local real estate brokers, we'll be  
11 finding a property. And yes, they have a parameter --  
12 parameters that they're looking for.

13 And, you know, they will get different options  
14 and they will submit that information in terms of  
15 demographics and location and so forth and size and  
16 whatnot. And they will submit that. And that will be  
17 reviewed and it will be yes, this is a good building,  
18 it's an appropriate location, so forth, or no, it's not.

19 Q And what are those parameters that are given  
20 to local Realtors, find me a building that will do what?

21 A I can give you in general terms, but obviously  
22 it's got to be in a good location.

23 Q And how do you -- yeah. How do you define  
24 good location?

25 A Well, you know, it's ideally, you know,

1 somewhat centrally located. It's in -- ideally be  
2 prominent. It's easy to access. It's easy to get to.  
3 People can get to it. And most definitely it's got to  
4 be the proper size.

5 Q Okay. And what is that proper size that  
6 you're looking at in terms of development parameters  
7 when the Realtors are sent out looking?

8 A It's between 40,000 and, you know, we could  
9 even go up to 70,000. I mean, those are generally --  
10 just so we don't cut it off and, say, someone finds a  
11 building that's 71,000 square feet or 68,000 square  
12 feet, you know. We don't want to say, hey, you can only  
13 do 40 to 55. Because maybe it's a great building, you  
14 know. And so that's generally what we use.

15 Q And besides the size of the building, what  
16 other features would your group look at in terms of  
17 determining whether a building is a good prospect for an  
18 ideal org?

19 A Those are the main ones. I mean, again, you  
20 want it to be in a nice area. You don't want to be in  
21 some slum area or something of that nature.

22 Q You mentioned demographics a minute ago. Is  
23 there a particular demographic that Scientology seeks to  
24 build its ideal orgs near?

25 A Well, you know, the only -- not necessarily,



1 no. And really kind of what I meant by that is -- well,  
2 it's more location I would say. And it depends. You  
3 can have different locations. You can have a Church of  
4 Scientology in a middle, smack dab in the middle of a  
5 city. Or you can have it outside a bit, you know. It's  
6 really location. It kind of depends on that area, you  
7 know.

8 I mean, if someone finds a building and it's  
9 literally out in the middle of nowhere, no one's ever  
10 going to be able to find it, no one's ever going to be  
11 able to get to it, we wouldn't do it.

12 Q Were you involved in the search for a property  
13 in the city of Atlanta or in the Atlanta metropolitan  
14 area I guess would be a more appropriate way to phrase  
15 it?

16 A No. I mean, you mean when we found this one?

17 Q Yes.

18 A No. That was -- I think this one was  
19 purchased in -- God, I don't remember what year. I'm  
20 not sure what year. 2005 I think.

21 Q I believe that's correct.

22 A Yeah. Again, I wasn't involved at that time,  
23 no.

24 Q Okay. Are you familiar with any of the  
25 history of the approval process for this building dating

1 back to 2005?

2 A Not really, no.

3 Q Do you know who would have been involved in  
4 the decision making in 2005 when this building was put  
5 up, when this building was proposed?

6 A Not exactly, no. I mean, I could guess at who  
7 I would think would be involved. But I can't say yes,  
8 that individual was involved and that individual was  
9 involved because I don't exactly know that.

10 Q Let me ask you this: In your present capacity  
11 when you are reviewing a site that has been proposed --  
12 and let me back up again.

13 Do you review sites that are proposed for new  
14 ideal org facilities?

15 A Yes, ma'am. I do.

16 Q Okay. When you do that review, is there any  
17 paper trail that includes documentation on the site,  
18 notes that you may have, et cetera?

19 A That I may have?

20 Q Yes.

21 A You mean in terms of the history of locating  
22 one?

23 Q I'm looking for documents that would reflect a  
24 review decision. What documents are generated or put  
25 together for that review decision to be made?

1           A     I see. Well, there's a checklist. And it's  
2     called a building investment checklist. And that, you  
3     know, basically has a list of various different  
4     components that you might look for.

5           Q     Okay.

6           A     Somewhat similar to what I mentioned earlier.

7           Q     What kinds of things would be on that  
8     checklist that you would want to see before you gave yea  
9     or nay to a proposed building?

10          A     Definitely the location, what about the  
11     location, where is the building located in relation to  
12     the overall city and so forth. Obviously the price of  
13     the building. The size of the building. Existing state  
14     of the building, the condition of the building. Those  
15     types of things.

16          Q     Does someone in your position make a visit to  
17     a proposed building if it looks like a promising  
18     building before the deal is done?

19          A     Sometimes but not always.

20          Q     Do you normally have pictures that are  
21     provided of that building?

22          A     Yes.

23          Q     Would you normally have a structural  
24     engineer's report on the building?

25          A     Sometimes. Not always but sometimes. If

1 maybe the structure is under question probably. If it's  
2 in a seismic zone probably, yes.

3 Q And would you keep those materials that you  
4 reviewed for a proposed site after your review was done?

5 A Sure.

6 Q Where would you keep them?

7 A I would keep them in my office back in  
8 California.

9 Q In your office in California -- I understand  
10 you've only been in that position for two years -- did  
11 the person who was in that position prior to you keep  
12 those records for buildings that he or she reviewed  
13 during that period?

14 A To my knowledge, yeah.

15 Q And have you seen a file on the Scientology  
16 location proposed for Sandy Springs dating from 2005?

17 A I personally have not, no.

18 Q Has anyone looked for the file that would have  
19 dealt with the initial approval by CSI of the Sandy  
20 Springs location?

21 A I don't see any reason to look for it. Not  
22 that I know of.

23 Q Well, we requested documents in discovery  
24 related to that purchase of that building and we didn't  
25 receive very much.

1 A Oh, okay.

2 Q So I'm questioning whether there might be  
3 other documents available. Who would we go to to find  
4 that out?

5 A That could be possible and I would have to  
6 look into that. There is a girl that works under me and  
7 her name is Danaea Young. She would probably know if  
8 there was.

9 Q Have you been to the Sandy Springs building?

10 A Yes, I have.

11 Q All right. So you're familiar with that  
12 building?

13 A Yes.

14 Q How many times have you been there?

15 A I think once. I'm trying to think...

16 Q Did you go throughout the building?

17 A Yes, I did.

18 (Defendants' Exhibit No. 14 was marked for  
19 identification.)

20 Q (By Ms. Henderson) Mr. Wright, I'm handing you  
21 what has been marked as Defense Exhibit 14. And I will  
22 represent to you this was also supplied by your  
23 attorneys as part of discovery.

24 A Mm-hmm.

25 Q Do you know what this exhibit represents?

1           A     Looks like a list of some of our existing  
2 buildings, churches.

3           Q     All right. Are any of these buildings ideal  
4 orgs?

5           A     Berlin, Buffalo, Nashville, Dallas, Las Vegas,  
6 Johannesburg, London, Los Angeles. Looks like most all  
7 of them actually. Hold on. Yeah. They all are.

8           Q     Does this list represent a comprehensive list  
9 of Scientology Class V ideal orgs?

10          A     It depends --

11          Q     At some point in time?

12          A     It depends what you mean by "comprehensive."  
13 It's not -- well, actually -- yeah, I think so,  
14 actually. Yes.

15          Q     So we have basically 19 facilities listed  
16 here. Does that correspond with the number of ideal  
17 orgs in existence?

18          A     I think there's 21 now I believe, yeah.

19          Q     And what would be the most recent ones that  
20 have been added?

21          A     You've got Seattle, Pasadena, and Mexico City.

22          Q     Okay. When Scientology is searching for a  
23 building to be used as an ideal org, are there any  
24 standards that have been developed for parking  
25 associated with that building?

1           A     No, that I'm aware of.

2                     (Defendants' Exhibit No. 15 was marked for  
3           identification.)

4           Q     (By Ms. Henderson) Mr. Wright, the next  
5   document that I'm handing you has been marked as I  
6   believe Defense Exhibit 15. Is that correct?

7           A     Wow.

8           Q     And I will represent this was also provided to  
9   me as part of discovery. And ask if you are familiar  
10   with this document and can identify it.

11          A     I've never personally seen it, but, you know,  
12   obviously the content is familiar. It's Scientology  
13   courses and services.

14          Q     And the heading on it says Class V church  
15   courses and course rooms.

16          A     Mm-hmm. Yes.

17          Q     You've got the first heading says individual  
18   course rooms for individual courses and there are 12  
19   rooms listed; is that correct?

20          A     That's correct.

21          Q     If you are planning a new Scientology facility  
22   that's going to be Class V, would you expect to see  
23   course rooms for these 12 areas?

24          A     Yes.

25          Q     Okay. Now let me ask you this: The first --

1 this is an example. So I'm just trying to get a feel  
2 for how this works.

3 A Sure.

4 Q You need a course room for success through  
5 communication course room?

6 A Mm-hmm.

7 Q And then you also need a course room called  
8 key to life course room?

9 A Yes.

10 Q Can the same course room be used for those two  
11 courses?

12 A No.

13 Q Why is that?

14 A Well, they're entirely different materials,  
15 different courses, different check sheet, if you will,  
16 different -- it's -- well, first of all, a success  
17 through communication course is laid out in such a way  
18 where you only have chairs of people sitting next to  
19 each other. Key to life course room has tables and  
20 chairs and people sitting studying, and there's  
21 different functions that go -- it even has a clay table,  
22 things like this. You do clay table things. So they're  
23 laid out entirely differently. So you couldn't deliver  
24 the same course in that course room.

25 Q Off the record.



1 (A discussion was held off the record.)

2 Q (By Ms. Henderson) So are you telling me that  
3 each of these 12 rooms because of the function it serves  
4 has to be set up differently and there can't be overlap  
5 among the rooms?

6 A Yes, ma'am. Exactly.

7 Q Then we get to number 13. This is life  
8 improvement course room for life improvement courses.  
9 Is it accurate to say that anyone taking any of these  
10 courses could comfortably be accommodated in a life  
11 improvement course room?

12 A Yes. I think so.

13 Q And the same with public theory course room.  
14 Any of these courses could be taught within a public  
15 theory course room?

16 A Yeah. Yes.

17 Q Are most of the -- let me back up. How many  
18 of the programs that Scientology offers are group  
19 oriented as opposed to individually oriented?

20 MR. MOXON: Objection to the form of the  
21 question.

22 Q (By Ms. Henderson) Let me try to do better.  
23 Is most of the study that someone would do within  
24 Scientology done on an individual basis, individual  
25 instruction basis?

1           A     Yes.

2           Q     Self-learning basis?

3           A     Yeah.

4           Q     And so is that person working with set  
5 materials and doing certain activities with respect to  
6 those materials?

7           A     Yes.

8           Q     So for instance, if we're looking at category  
9 for life improvement, someone could pick up course  
10 materials on personal values and integrity and be  
11 working side-by-side with someone who's working on  
12 financial success?

13          A     Yeah. I mean, these Division 6 life  
14 improvement courses, yeah, 'cause you can deliver those,  
15 yeah, together, 'cause they're all beginning people.

16          Q     And there are many things listed under public  
17 theory course rooms. Are these courses also  
18 individually oriented under the public theory section?

19          A     I'd have to look over all of them to be able  
20 to answer that. If you want a majority, yes, I mean,  
21 some relate to marriage and one relates to children and  
22 so forth. But generally speaking, yes.

23          Q     Are there other classes which Scientology  
24 offers which are done with groups of two or more people  
25 at a time receiving the same instruction from a third

1 party?

2 A Yes.

3 Q All right.

4 A Yeah.

5 Q How many of those type of courses are offered  
6 in a Class V ideal org?

7 A You know, I don't exactly know the answer to  
8 that question, but I can tell you one on here that I see  
9 is the personal efficiency course and there you have a  
10 group of people together that is -- and that course is  
11 administered by a third party individual. That's one  
12 example.

13 Q Okay.

14 A The full list of what those are I actually do  
15 not know. Yeah.

16 Q So again, I'm trying to make sure that my  
17 understanding is clear.

18 A Sure.

19 Q Most of the instruction or learning that takes  
20 place within a Scientology facility is going to be  
21 individualized instruction but there is some group  
22 instruction as well?

23 A Correct.

24 Q And so there will have to be some rooms for  
25 group assembly; is that correct?

1 A Mm-hmm. Correct.

2 Q And there are also different rooms that are  
3 set up in different ways because courses are structured  
4 differently in terms of how people work them; is that  
5 correct?

6 A Exactly.

7 Q Okay. I'm slow but I catch on.

8 A You're getting it.

9 Q Let me back up here a minute. I know that you  
10 said you were not around in 2005 when this building was  
11 purchased in Sandy Springs. So you probably aren't  
12 going to know the answer to this question, but I'm going  
13 to ask you anyway.

14 A Okay.

15 Q Exhibit 5 to the deposition of Deb Danos is a  
16 letter from Fulton County which is basically in response  
17 to a zoning request. Have you seen that document  
18 before?

19 A No, ma'am. I haven't.

20 Q Do you know, do you have any knowledge of what  
21 steps CSI went through in 2005 prior to purchase of the  
22 building?

23 A No. 2005 I don't.

24 Q All right. Who would be the person who would  
25 be most intimately -- who would have been most

1 intimately involved in 2005 with the purchase of the  
2 building?

3 A 2005. You know, probably -- again, I'm  
4 telling you who I think was probably involved in it if  
5 that's okay. Brian Jasper, he is -- he is more of a  
6 local, you know, in the east coast person in the church  
7 that deals with property and so forth.

8 Q Where is his office?

9 A It's in New York.

10 Q And he's still with Scientology?

11 A Yes.

12 Q In the New York -- in New York?

13 A Yes. I'm sure there was others, I mean, but I  
14 know he was most likely involved.

15 Q Were you involved in the rezoning effort in  
16 Sandy Springs to have the Sandy Springs property on  
17 Roswell Road rezoned from its O-I conditional  
18 classification to a regular O-I classification?

19 A Recently, yes. Yeah.

20 Q And what was your first involvement with that  
21 rezoning application?

22 A Well, you know, when we start out a project,  
23 you know, I build them, plans are done. Or the plans  
24 are being done. You know, one of the first steps is  
25 entitlement, steps to find out if there's any issues

1 with the building. And this came up during the process.

2 And we have Gensler do the entitlement for us.

3 And so I was like, okay, good. So we got to

4 do a rezoning and we'll go ahead and do that.

5 Q And how did the issue arise -- tell me what  
6 you mean by "entitlement."

7 A Any condition, existing condition with the  
8 building that would need to be addressed so that we  
9 could occupy the building.

10 Q All right. Did Gensler tell you that it had  
11 looked into the zoning on the property?

12 A I know that they did, yes.

13 Q And was it Gensler that informed CSI that  
14 there was an issue with zoning that would have to be  
15 fixed?

16 A Yes.

17 Q Okay. To your knowledge, had anyone before  
18 that report understood that there was any issue of  
19 zoning that would have to be changed to occupy the  
20 building as a church?

21 A I could speculate on that because I don't  
22 really know the answer to that question, but it's  
23 possible I suppose, yeah.

24 Q What did CSI do once it learned from Gensler  
25 that there would have to be a rezoning?

1 A I'm sorry. Could you repeat that?

2 Q Did CSI handle the rezoning or did the local  
3 church handle the rezoning?

4 A We did. CSI handled it with our attorneys and  
5 Gensler. Yeah.

6 Q Okay. And who handled that process on behalf  
7 of CSI?

8 A I did and -- yeah. Me.

9 Q Okay.

10 A Yes.

11 Q And --

12 A And our in-house legal liaison people, yeah.

13 Q At the time that this came around to a zoning  
14 issue in I guess 2009 --

15 A Yeah.

16 Q -- Georgia Scientology had owned the building  
17 for over four years; is that correct?

18 A Yeah.

19 Q And it had been vacant for four years and  
20 unused?

21 A To my knowledge, yes.

22 Q Do you know why the building was left vacant  
23 and unused for four years?

24 A No, not really other than the time to plan it,  
25 you know. We've got, you know, what, 80, 90 other

1 projects around the world that we have to deal with in  
2 terms of planning. So it was probably where that's at  
3 on the lineup.

4 We've got other properties in the same  
5 condition because we can plan so many to get them done.  
6 In other words, we bought a lot of properties up-front  
7 before we really started getting all that and then we've  
8 got to come back and actually fully plan and construct  
9 them all.

10 Q So this property was purchased and will you  
11 agree with me that the finished floors of the building  
12 comprise approximately 32,000 square feet?

13 A Sure. Yes.

14 Q All right. And then we have the lower ground  
15 level which would add an additional 11 or 12,000 square  
16 feet, is that correct, if it were redesigned?

17 A Yes. Yeah. I think it brings the total to  
18 44, something like that.

19 Q That brings the total to just over 44,000  
20 square feet?

21 A Yes.

22 Q By your testimony, that size with the  
23 modifications is still on the low end of what you need  
24 for an ideal org, is it not?

25 A Yes, it is.



1 Q Was there any examination at that point when  
2 you realized here's how many square feet we have, here's  
3 how many we need, that anyone thought it might be better  
4 to look at another substitute building?

5 A No. We never considered that.

6 Q Okay.

7 A It was, you know, with the whole building is  
8 adequate.

9 Q All right. Let me mark this.

10 MS. HENDERSON: Andrea I'm going to keep  
11 the oversized exhibits with me because I went to  
12 Kinko's this morning; the blueprint machine wasn't  
13 working so I couldn't reproduce them. So if you  
14 need them --

15 MS. JONES: I probably will want to have  
16 a copy of all of the exhibits when I get my  
17 transcript.

18 MS. HENDERSON: Okay. Yeah. We'll get  
19 them copied. We'll get them copied.

20 (Defendants' Exhibit No. 16 was marked for  
21 identification.)

22 Q (By Ms. Henderson) All right, Mr. Wright. The  
23 next exhibit is No. 16. And can you tell me what this  
24 is?

25 A That is what we call the Classification and

1 Gradation Chart Scientology, the Bridge to Total Freedom  
2 what we call it.

3 Q And what does this chart represent?

4 A The different levels in Scientology and the  
5 auditing or processing side we call it and also on the  
6 training side of the bridge.

7 Q With respect to this chart, how much of what  
8 is on this chart would you expect to be handled within a  
9 Class V organization?

10 A That (indicating) and that (indicating).

11 Q Now, the court reporter is not going to be  
12 able to see that.

13 A I'm sorry.

14 Q So on the training side from the bottom up  
15 through class 3?

16 A Class 4.

17 Q Class 4?

18 A Mm-hmm.

19 Q And on the auditing side it would be from the  
20 bottom up through?

21 A Clear.

22 Q Up through Clear?

23 A Right.

24 Q Okay. And then where would someone go if they  
25 wanted to move beyond those levels?

1           A     You'd go to one of our advanced organizations.  
2     We have one in Clearwater, Florida. We have one in Los  
3     Angeles, which are two of the main ones, yeah.

4           Q     Now, with respect again to Exhibit 14, is  
5     there any difference in what a Class V org would handle  
6     from what a Class V ideal org would handle?

7           A     I'm not sure that I can -- I'm not sure I  
8     totally get that question. But if what you're asking is  
9     the difference, in other words, it's pretty much what I  
10    stated earlier. In a Class V organization that is not  
11    an ideal organization, the difference is it doesn't have  
12    the space requirements needed to deliver what  
13    Scientology, ideal Scientology Class V organization is  
14    meant to deliver.

15          Q     So an ideal Class V organization would be  
16    designed to go through class 4 on the training side?

17          A     Mm-hmm.

18          Q     And up through Clear on the processing side,  
19    correct?

20          A     Correct.

21          Q     And a Class V org that's not ideal hopefully  
22    would do those things but might not have enough room to  
23    handle all of that?

24          A     Exactly.

25          Q     Did I get that right?

1           A     You got it.

2           Q     Okay. All right. What is the difference  
3 between Dianetics and Scientology, if there is one?

4           A     Yes. There's definitely and I tell you  
5 probably the best way to explain that to you is to show  
6 you in writing what the difference is. But, you know, I  
7 can answer you with, you know, my answer, but I can show  
8 you exactly what L. Ron Hubbard, our founder, says the  
9 difference is between them.

10          Q     Give me at this point your best answer unless  
11 you've got it handy where you can read me an answer.

12          A     It's probably right in there (indicating).  
13 Let me see. It will probably be better to read it.

14          Q     And if -- I'm going to ask you if you read to  
15 me from the book, I'm going to ask you to identify for  
16 the court reporter the title of the book, the date of  
17 publication and then the page that you're reading from.

18          A     Sure.

19                   MR. MOXON: Want to take a minute and a  
20 half and he'll look at that?

21                   MS. HENDERSON: It's actually about 20  
22 till 12:00. You need a break, we can take a break  
23 a little while. We've been at it for a while.

24                   (A discussion was held off the record.)

25                   (A recess was taken from 11:38 to 11:47 a.m.)

1 Q (By Ms. Henderson) Okay. We're back on the  
2 record. Mr. Wright, you're reading from a book. What's  
3 the title of that book?

4 A The title is What is Scientology? And  
5 publication was in 1998.

6 Q And that book has -- it was written by L. Ron  
7 Hubbard; is that correct?

8 A No.

9 Q It's not. I saw his name on the bottom. It's  
10 just a --

11 A It's based on the works of L. Ron Hubbard.

12 Q All right. Tell me what the book provides as  
13 the difference between Dianetics and Scientology.

14 A Okay. So I'll read from page 546 of the book.

15 Q All right.

16 A And this is a subheading, it says: What is  
17 the difference between Scientology and Dianetics?  
18 Dianetics comes from the Greek dia meaning "through" and  
19 nous, "soul." It is further defined as "what the soul  
20 is doing to the body."

21 Dianetics uncovers the source of unwanted  
22 sensations and emotions, accidents, injuries and  
23 psychosomatic illnesses, and sets forth effective  
24 handlings for these conditions. Further research into  
25 the spiritual aspects of Dianetics led to the discovery

1 of Scientology.

2           Scientology, on the other hand, is the study  
3 and handling of the spirit in relationship to itself, to  
4 universes and to other life. Through the practice of  
5 Scientology one can increase his spiritual awareness and  
6 ability and realize his own immortality.

7           Dianetics and Scientology both utilize the  
8 E-Meter and basic rules of auditing.

9           That's it.

10          Q    Is there a division as you're looking at the  
11 bridge between Scientology and Dianetics where Dianetics  
12 starts and then Scientology takes over, or are they  
13 intertwined?

14          A    Well, actually, interesting enough, these are  
15 all Scientology processes grade zero, 1, 2, 3, 4.

16          Q    You're looking on the processing portion of  
17 the bridge?

18          A    Correct. These are Scientology processes.

19          Q    Okay.

20          A    And this is Dianetics.

21          Q    Okay. Above the Scientology on the bridge?

22          A    Yes. However, look at this here. You can --  
23 these are introductory services and --

24          Q    And I keep interrupting you because when you  
25 say "these are," she's not going to be knowing what

1 you're pointing to.

2 A Sorry.

3 Q So I'm trying to get you to define what you're  
4 talking about a little more clearly.

5 A Got you. At the bottom of the chart  
6 underneath the Purification Rundown you have  
7 Introductory Services. One of those introductory  
8 services is Book 1 Dianetics. So you can actually  
9 receive Dianetics auditing before this point  
10 (indicating) actually.

11 Q Okay.

12 A And that's probably hard for you to understand  
13 without me going into some long dissertation about the  
14 religion and the technology of Scientology.

15 Q What about on the training side, is there a  
16 division going through class 4 between Scientology and  
17 Dianetics on the training side?

18 A Yes. Okay. So you've got up to class 4 again  
19 which grade 4, class 4 can deliver up to that. They can  
20 mirror each other. Class 5 is a New Era Dianetics  
21 Auditor. And that class of Auditor is classified to  
22 deliver New Era Dianetics auditing.

23 Q What about classes 1, 2 and 3 on the training  
24 side of the bridge, are those Scientology classes?

25 A Yes. And that would enable an Auditor to

1 deliver, for example, class zero, that Auditor could  
2 deliver grade zero on the processing side which  
3 Scientology processes.

4 Q All right.

5 (Defendants' Exhibit No. 17 was marked for  
6 identification.)

7 Q (By Ms. Henderson) Mr. Wright, I've handed you  
8 a document which I have identified as Defendants'  
9 Exhibit 17 and I will tell you that I took that document  
10 out of the introductory pages of a book called  
11 Scientology Ideal Organizations 2009-2010. It  
12 interestingly has no copyright page so I'm not going to  
13 give you a date. But it's a book that's been sitting  
14 here on the table. This document is headed The Ideal  
15 Org by L. Ron Hubbard and it has a date of May 20, 1970.

16 Can you tell me what this is?

17 A This is a policy written by L. Ron Hubbard,  
18 the founder, which gives an overall conceptual idea of  
19 what, you know, an ideal org would be. It's a happening  
20 place.

21 Q Did L. Ron Hubbard ever give any more specific  
22 direction on what an ideal org would be other than what  
23 has been shown on Defense Exhibit 17?

24 A Well, really, you know, the subject of an  
25 organization and how you establish an ideal org, Class V



1 org -- see, the thing is, a Class V org is supposed to  
2 be an ideal org. They're all supposed to be.

3           So to answer that question, yes, I mean,  
4 there's thousands of pages of policy letters and  
5 bulletins that he wrote that comprise the religious  
6 doctrines which make up a Scientology organization and  
7 how you organize it. One of those being that organizing  
8 board.

9           Q    As someone who is charged with establishing  
10 new churches through CSI, are you familiar with those  
11 writings by L. Ron Hubbard on ideal orgs?

12           A    Yes. I mean, I've studied many policy  
13 letters.

14           Q    And is there anything in those writings that  
15 deals with the area of parking?

16           A    Not that I'm aware of, no. Mind you, I  
17 couldn't swear to that. I haven't read every single  
18 word in every written policy letter. So to my  
19 knowledge, no.

20                   MS. HENDERSON: You know, it's 12:00  
21 o'clock. This may be a good time to take a lunch  
22 break because the next thing I want to do is go  
23 into these and that may take a while to go through  
24 these.

25                   MS. JONES: When you say "these"?

1 MS. HENDERSON: Those are the building  
2 plans for the Sandy Springs facility.

3 MS. JONES: Would it be possible for Bob  
4 to have a look at those during lunch?

5 MS. HENDERSON: This is the only set that  
6 I have.

7 MS. JONES: We won't tear them up.

8 MS. HENDERSON: Make sure they all stay  
9 together. They've already been marked as Defense  
10 Exhibit 3.

11 (A discussion was held off the record.)

12 (A luncheon recess was taken from 11:55 a.m.  
13 to 12:53 p.m.)

14 Q (By Ms. Henderson) Mr. Wright, what I would  
15 like to do is go through with you the building plans  
16 that are Defendants' Exhibit 3 collectively all as  
17 Exhibit 3. And when we talk about them, we'll be  
18 talking about them by plan sheet number in the lower  
19 right-hand corner.

20 A Okay.

21 Q Are you familiar with these plans?

22 A I don't know when -- I looked at it down at  
23 lunch. I don't know what -- when this set was issued or  
24 exactly what it is. I have looked at a set of Atlanta  
25 plans. Oh, here we go. 5 February. I'm assuming

1 they're the same ones. So I've seen these plans.

2 Q I will represent to you that these are the  
3 plans that were submitted to the City of Sandy Springs  
4 by Church of Scientology --

5 A Okay.

6 Q -- in support of their zoning application and  
7 their discussion.

8 A Okay.

9 Q Does this plan set correspond generally with  
10 the plan set that CSI obtains with respect to new ideal  
11 orgs in terms of the kinds of things that are shown on  
12 the plans?

13 A Yeah. Yes. In terms of you mean like here  
14 you've got different spaces and these types of things?

15 Q Right.

16 A Sure.

17 Q Okay. All right. And is it CSI's practice to  
18 obtain sets of plans for each Scientology facility?

19 A Well, we're the ones who actually get the  
20 plans done. Existing as-builts and so forth of  
21 buildings, yes, it's -- we usually get as-builts of the  
22 building, sure.

23 Q And you have mentioned Gensler before as the  
24 architect. Is there any particular person at Gensler  
25 that CSI was dealing with?

1 A Mainly Colin O'Brien.

2 Q How do you spell that name?

3 A Colin. And then I think O --

4 Q O'Brien?

5 A -- B-r-i-e-n.

6 Q I didn't hear the first name.

7 A Yeah. And I'm sure he's got other, a couple  
8 architects that he's had work on it. Don't know the  
9 names off the top of my head.

10 Q Okay. Has Gensler -- is that a national  
11 company?

12 A Yes.

13 Q A national firm.

14 A Mm-hmm.

15 Q Does Gensler do most of the building plans for  
16 Scientology facilities?

17 A They do to a certain point, yes. They will do  
18 the initial designs. They will do the schematic and DD  
19 level plans, which is design development level drawings.  
20 And that's up to a certain point. Sometimes often but  
21 not always -- depends on what country, what location --  
22 Gensler can be the full architect of record and they  
23 will do all of the final construction drawings. Not  
24 always. Again, depends on the location. If they are  
25 not, then we will go out and get another local architect

1 of record in that area to do the final set of drawings.

2 Q But Gensler will always do the preliminary  
3 work on any site is your testimony?

4 A Yes.

5 Q And then in another -- do they exclusively do  
6 all the work in the United States or are there other  
7 architects who are also brought in to other United  
8 States facilities?

9 A Well, again, in the United States we have  
10 different local architects that we've used to do the  
11 final drawings. Such as Seattle we've used a group  
12 called EHS.

13 Q Okay.

14 A Yeah.

15 Q Gensler is listed here with an Atlanta  
16 address.

17 A Mm-hmm.

18 Q On Marietta Street.

19 A Yes.

20 Q Is that an office that Scientology has used  
21 before?

22 A Yes. They do a lot of our work.

23 Q Okay. So that office should be familiar with  
24 Scientology's approach to building these facilities?

25 A Oh, yeah.

1 Q Is that correct?

2 A Yes.

3 Q Okay. All right. Going to sheet A00.20 and  
4 A00.21, can you tell me what these sheets represent?

5 A Well, this looks -- I mean, this generally  
6 speaking shows the space plan layout of the organization  
7 of a church. It's obviously got notes of passive egress  
8 and so forth probably for sake of city planning person  
9 wanting to do a review to see that type of information.

10 Q Okay. And this would be for four floors  
11 including a finished out ground level; is that correct?

12 A Yes.

13 Q All right. And these two sheets that have  
14 already been identified also show furnishings on the  
15 floors and seating as well; is that correct?

16 A Correct.

17 Q Now, when a facility is planned of this nature  
18 as an ideal org, does the space planning normally  
19 include this kind of breakout of use by areas and the  
20 arrangement of furnishings within those uses?

21 A Yes, it does.

22 Q And is it CSI's policy that the facility is to  
23 be built and equipped in accordance with this space  
24 layout?

25 A Yes. Most definitely.

1           Q     So for instance on plan sheet A00.20 the  
2 bottom drawing on that page shows a central assembly  
3 area with seating. I'm assuming that's the chapel area;  
4 is that correct?

5           A     It looks like it, yeah.

6           Q     And would you expect that this fairly  
7 represents the seating that is anticipated in that  
8 chapel at that location?

9           A     Yes.

10          Q     So that when the facility is completed, you  
11 would expect to see that number of seats there; is that  
12 correct?

13          A     Correct.

14          Q     When CSI is planning for a new ideal org, are  
15 there capacity limits that are put in place for any  
16 particular building in terms of how many people total  
17 can be accommodated at one time?

18          A     No. I mean, obviously you have limitations  
19 within the spaces themselves. I mean, in other words,  
20 if you have a course room that will seat X amount of  
21 people, obviously you can only fit that many people in  
22 the course room.

23          Q     Okay. That's fair. Taking a look at sheet  
24 A00.21, this page shows some -- in the main center area  
25 as well it shows what appear to be some oblong tables

1 and then some other things that look like they're shaped  
2 like dog bones.

3 Do you recognize what those -- I know they're  
4 not dog bones. I'm sorry. I'm not meaning to be funny.  
5 I'm trying to identify them.

6 Do you know what those are?

7 A Yes, I do. These are actually the Scientology  
8 information displays. Display panels which when you  
9 look through that book you might have seen some of those  
10 panels with the audio-visual displays in that. Those go  
11 into every Church of Scientology ideal organization and,  
12 you know, that's to have anybody come through and find  
13 and see all of our programs and so forth, what  
14 Scientology is.

15 MR. MOXON: Before you ask another  
16 question, may I just speak with him just one  
17 moment?

18 MS. HENDERSON: All right.

19 (A recess was taken from 1:01 to 1:02 p.m.)

20 Q (By Ms. Henderson) Looking again at plan sheet  
21 A00.21, the central area you indicated is the display  
22 area, would that be accessed primarily by people who are  
23 standing as they walk through the displays?

24 A Yes. I mean, there's like this is a little  
25 bench and someone can sit there, like one, maybe two



1 people could sit there and watch a display. But  
2 generally yes.

3 Q And then off that central display area there  
4 is an area to the lower right which appears to have some  
5 tables and some chairs seating; is that correct?

6 A Mm-hmm.

7 Q What is that area used for?

8 A You know, I'd have to look at what the space  
9 plan is. I don't know. If I saw the label on it, I  
10 could tell you. But it looks like from this -- I'm  
11 going to tell you I'm guessing 'cause it's not labeled.  
12 But I can find out easily what the actual is. But it  
13 looks to me like it's the registrar area. So to  
14 interview someone, a new person that's maybe walking  
15 through the displays and so forth and possibly sign them  
16 up for a new course.

17 Q Okay. Let's see. This may explain some  
18 things. Let me look here quick. Let's look at plan  
19 number -- or sheet number A02.01A. And the next sheet  
20 which taken together are two halves of that same floor.  
21 Does this indicate what the areas are used for on these  
22 two sheets?

23 A Yes. Actually, it does. This is better.

24 Q Okay.

25 A Yeah, it does. Yes.

1 Q All right. This is the first floor of the  
2 building; is that correct?

3 A Level 1. Looks like it, yes.

4 Q With respect to the main exhibit area, does  
5 Scientology have any capacity limits on how many people  
6 would be in that area at any one time?

7 A Nothing written, no.

8 Q So it's more a function of how many people the  
9 area would comfortably hold?

10 A Sure.

11 Q Or any official capacity limit based on fire  
12 safety?

13 A Sure. Yes.

14 Q Okay. With respect to the stairway, is there  
15 anticipated -- next to the stairs there appears to be a  
16 desk.

17 A Mm-hmm.

18 Q Is there someone anticipated to be sitting at  
19 that desk at all times?

20 A It looks like the reception. Yes. There  
21 would be a person there.

22 Q Okay. And then the area that we were looking  
23 at before was right here (indicating).

24 A Yes.

25 Q Which was shown on the smaller plan as having

1 a number of seats. Can you tell what that area is  
2 designated for?

3 A Yes. That's the testing area.

4 Q Okay. And this appears to show a table with  
5 four seats, another --

6 A I can explain that to you.

7 Q Explain that to me.

8 A Okay. So basically what this is, it's  
9 actually not one table. They're individual little  
10 booth-type tables.

11 Q Like carrels?

12 A Yeah. Like one individual would sit there and  
13 take tests.

14 Q All right.

15 A And then after they're done with the test --

16 Q So there are four of those facilities?

17 A Yes.

18 Q Okay.

19 A After they're done with the test, somebody  
20 will grade the test, and then these people will then see  
21 them after the tests are graded to evaluate the test and  
22 interview the person.

23 Q All right. Given that there are up to four  
24 people that can take tests, how many people would be  
25 associated with those four people to grade and evaluate?

1 Would there be one, four or some number in between?

2 A You'd have probably two, maybe three.

3 Q And what would be the maximum use of that room  
4 for its intended function given the number of testing  
5 booths that are in there?

6 A Well, you'd never have -- you know, you'd  
7 never really have more than four people at a time 'cause  
8 once that's full, that's all you can really hold.

9 Q And if you have those four people at a time,  
10 would the people who test and monitor also be around in  
11 the room somewhere while those people were taking tests?

12 A Yeah.

13 Q So that would add probably another two people  
14 to that number of four?

15 A Yeah.

16 Q So we've got a capacity of six for that room?

17 A Correct.

18 Q In terms of your functioning?

19 A Yes.

20 Q All right. The room next to that which goes  
21 kind of between the testing area and the public exhibit  
22 area, what is that area designated for?

23 A That is the success for communication course  
24 room.

25 Q How does that room function?

1           A     That is a course room. You see anybody walks  
2 through here (indicating), they come in here  
3 (indicating) and --

4           Q     Walks through the exhibit area comes to the  
5 testing area. She can't get down --

6           A     Okay. I'm sorry. Walks through the exhibit  
7 area. I got to get used to this. Goes into the testing  
8 area. The person gets tested, interviewed, and most  
9 likely signed up for a course. And one of the first  
10 courses someone will take, introductory-type courses, is  
11 a success for communication course. And thus, it would  
12 literally go right into the course room and set the  
13 course.

14          Q     That course room, am I reading this right --  
15 4, 8, 12 -- 16 seats plus a desk?

16          A     Correct.

17          Q     So that would be the maximum number of people  
18 who could be handled in that room under Scientology  
19 system at any one time?

20          A     Yes.

21          Q     And it might not be full or it could be full,  
22 but 16 plus the desk would be all that could be handled  
23 in there?

24          A     Correct.

25          Q     And this little room behind that that shows

1 what appears to be three tables with four chairs each,  
2 what is that?

3 A That says outdoor patio. So looks like  
4 outdoor seating.

5 Q That's just a lounge area for people who are  
6 already there for some other purpose?

7 A Yeah. Most likely, yes.

8 Q Is there any training that goes on out there?

9 A No.

10 Q Going down to the end of the building, this  
11 first space to the front on the end has several large  
12 tables with six to eight seats apiece.

13 A Mm-hmm.

14 Q What is that room?

15 A That's the public theory course room it's  
16 called. And that is -- you've got theory course rooms  
17 and practical course rooms. Theory you're in there,  
18 it's quiet, you're studying quietly whatever particular  
19 course you're on.

20 Q This is shown designed with 46 seats plus two  
21 seats over at this other location. Does that correspond  
22 with the maximum use Scientology could make of that room  
23 at any one time?

24 A Yes. You couldn't fit anybody else in there.

25 Q Okay. And is this setup pretty much the way

1 Scientology would like that kind of a course room to be  
2 set up?

3 A Yes.

4 Q Then the room that is behind that on the end  
5 of the building, what is that room for?

6 A Now that's the practical course room for  
7 the -- it's one particular course called HQS which is  
8 Hubbard Qualified Scientologist course and that's a  
9 practical course room for that.

10 Q Is this room across the hall from that related  
11 to the practical room?

12 A This one here (indicating)?

13 Q Yes.

14 A That's the life improvement course room is  
15 what that is.

16 Q Okay. And that has another 22 seats plus a  
17 desk; is that correct?

18 A I didn't count them, but I'm trusting your  
19 count.

20 Q I'm trying to count accurately.

21 A Good. Yes.

22 Q Okay. Now, when Deb Danos' deposition was  
23 taken, she said there was some of these courses the  
24 participants start in one room and then they move  
25 through another room.

1 A Yeah.

2 Q So we're trying not to count people twice, but  
3 we're trying to fairly count the maximum number of  
4 people. Are you with me?

5 A Sure.

6 Q Okay. So this front room that talked about,  
7 do those people get up and move to another room as part  
8 of the same course?

9 A Yeah. They would end up in there (indicating)  
10 at some point.

11 Q And the people who in this last classroom with  
12 the 22 seats, do they get up and move somewhere or do  
13 they stay in this room?

14 A That's the -- no. They would remain in there.  
15 Yeah.

16 Q So we're not going to count this room  
17 (indicating). And you told me the name of this was  
18 what?

19 A That's the practical course room for the HQS.

20 Q Okay. So we're not going to count the number  
21 of people in there. We're going to skip that over.

22 A Okay.

23 Q Then we get over here. What is this room that  
24 I'm pointing to on the end of the building near the  
25 rear?



1 A That's the HQS co-audit space.

2 Q All right.

3 A Yeah.

4 Q And what do people do in the co-audit space?

5 A Well, first you'll do the theory part of the  
6 course. Okay. And that's in a theory portion. You do  
7 study. And then there's practical exercise which you  
8 would do, which you would do in the practical course  
9 room. Drilling, you know, various drilling exercises,  
10 so forth, whatever is called out on the check sheet that  
11 you study.

12 And then eventually you would do a co-audit  
13 which is also part of the check sheet and it's part of  
14 the course. And that's -- a co-audit means you've got  
15 two people on a course together and we call them twins.  
16 That's your twin in a course. And those twins will  
17 co-audit, they will audit each other as part of that  
18 course.

19 Q All right.

20 A As opposed to an individual that just audits  
21 another person as their job.

22 Q Let's assume that I am in a co-auditing course  
23 and I'm learning how to co-audit. I'm assuming that's  
24 not -- that's something -- it's not something someone is  
25 going to learn in a two-hour block of time start to

1 finish?

2 A That's correct, yes.

3 Q So might I come one day for the class  
4 instruction and then come back on other days for  
5 sequential parts of that experience to complete  
6 everything?

7 A Absolutely. I mean, the length of time of the  
8 course I don't know off the top of my head, but it  
9 obviously takes a little while to get through it. You  
10 may finish the theory portion, say, in a certain amount  
11 of time and then you'd be into the co-audit portion.

12 Q So while you might start the theory portion in  
13 this front room, by the time you're back here it may be  
14 a different day and time; is that correct?

15 A Yes.

16 Q Okay. And this is set up it looks like for  
17 eight people plus a monitor for the room. Is that what  
18 that looks like to you in the co-auditing practice room?

19 A Yeah. That's what it looks like, mm-hmm.

20 Q Then on the very back corner of the building  
21 behind the co-auditing practice room what is that room?

22 A That's an executive and staff office for  
23 Division 6B.

24 Q And that looks like it has four desks; is that  
25 accurate?

1 A Yes.

2 Q Then there is another room across the hall  
3 with a similar four desks also for staff --

4 A Mm-hmm.

5 Q -- space?

6 A Correct.

7 Q And then there appears to be either a desk or  
8 a table with two chairs in between at the end of that  
9 hallway. What is that?

10 A It's the Est. O., which stands for  
11 establishment officer, interview room. And that's what  
12 it is. If you'd like me to elaborate on what the  
13 function is, I can tell you that.

14 Q I'm mostly interested in knowing whether that  
15 person sits there by themselves or if they frequently  
16 sit there with a person on the other side of the desk it  
17 sounds like interviewing them.

18 A It's hard to give a ratio, but, you know, it's  
19 a combination of both. They'll interview people  
20 sometimes. Sometimes they're just there by themselves.  
21 It fluctuates.

22 Q Okay.

23 A Yeah.

24 Q Then there are two small rooms coming back  
25 down the hall moving toward the center of the building.

1 Two small rooms with a desk and a chair on each side.

2 What are those used for?

3 A Those are introductory auditing rooms. So any  
4 introductory auditing would be delivered in those  
5 spaces.

6 Q All right. And two people per room would be  
7 their maximum; is that correct?

8 A Correct.

9 Q Then coming back to the other side of the  
10 public exhibit area, again looking at sheet A0021 in  
11 conjunction with sheet A -- give me number on the bottom  
12 of that sheet there.

13 A A02.01.B.

14 Q We have what looks like an assembly room to  
15 the left of the main stairwell and entrance with -- 1,  
16 2, 3, 6 -- 24 seats in it. What is that designated for?

17 A I'm actually not sure. This one here? I'm  
18 not sure.

19 Q Pull your next sheet and see if that is --  
20 here's the other half of that floor. Here you go. You  
21 put these two sheets together. So we're now in  
22 conjunction with A02.01A.

23 A Okay.

24 Q What is this small assembly room with 24 seats  
25 used for? It's right here (indicating).

1           A     Oh, this one.  That's a film room.  A public  
2 film room.

3           Q     Okay.  And I assume with 24 seats that would  
4 probably be the maximum at any one time that Scientology  
5 would probably put in there?

6           A     Correct.

7           Q     At the back of the display area on the very  
8 edge of the display area there is three squares and an  
9 oblong thing.  What is that?  Is that chairs and a table  
10 or is that something else?

11          A     Those are literally chairs and a coffee table  
12 and you have a display here (indicating).  So if you  
13 want to sit there and watch something on a display.

14          Q     Then the room behind that, what is that area  
15 designated for?

16          A     That's the L. Ron Hubbard office.

17          Q     Okay.  And is that room occupied?

18          A     No, it's not.

19          Q     Okay.  Then we have coming down the hall to  
20 the -- where's our north arrow?

21          A     Here we go.

22          Q     Yeah.  We've got what looks like just another  
23 little seating area for three people opening onto a room  
24 with two tables and eight chairs.  Do you know what this  
25 room is?

1           A     Yeah. That's an audio-visual room that's used  
2 to basically show some of our events, classic events  
3 that we've had. And there's basically a cabinet with a  
4 TV, audio-visual cabinet in that space. Where is that?

5           Q     That's right here.

6           A     Yeah. And those three people would be in  
7 there and they watch that. Could be one person, could  
8 be two.

9           Q     Moving toward the front, this area with two  
10 tables and eight chairs, what is that?

11          A     That's a patio. Yeah. That's outside patio  
12 it says.

13          Q     All right. Then moving down into the furthest  
14 most wing to the left of the front door in the very  
15 front corner, what is this?

16          A     That's the registration area.

17          Q     And that looks like it takes two desks with  
18 people and they can talk to one person apiece at the  
19 same time; is that right?

20          A     That's right.

21          Q     So that would be basically four people in that  
22 room --

23          A     Mm-hmm.

24          Q     -- at its maximum occupancy?

25          A     Yes.

1 Q Then in the very front corner, what is that?

2 A That's -- okay. That's another audio-visual  
3 room that essentially plays, has films that enlighten  
4 someone on Scientology. So if they're getting signed up  
5 or spoken to by the registration, registrar, they will  
6 often have them come in here and watch one of these  
7 films.

8 Q Okay. And does the space with the registrar  
9 remain open until they finish watching the film where  
10 they can go back, or does once these people leave the  
11 registrar and go into the film room do two more people  
12 potentially come in to those seats in the registrar's  
13 room?

14 A It can fluctuate. Typically after they're  
15 done with this they would come back in here  
16 (indicating). Yeah.

17 Q Then on the end of that wing what is this  
18 function here (indicating)?

19 A That's the bookstore.

20 Q All right. And how many people would normally  
21 be manning the bookstore on the staffing level?

22 A You'd only have one in there.

23 Q Okay. And is there any limitation on how many  
24 people might be using the bookstore at any one time?

25 A There's no set limitation, no.

1 Q Does Scientology have any average for how many  
2 people tend to be in their book stores on any given day?

3 A Not that I'm aware of. Not that I know of. I  
4 mean, again, that can fluctuate.

5 Q Is there normally someone in the bookstore or  
6 are they frequently just empty with a staff member  
7 there?

8 A I can't really accurately answer that without  
9 kind of studying some other -- going back and observing  
10 it, a typical organization, how that works, you know.

11 Q Okay. The rear of this wing, what is this  
12 area (indicating)?

13 A That's a treasury office.

14 Q And it has what appears to be six or eight  
15 seats in it. That's where people who are employees or  
16 volunteers work in that area?

17 A Correct.

18 Q And would that count be about right for a  
19 Class V org?

20 A Yes. I think so.

21 Q All right. Then is there anything else on  
22 this first floor that we haven't covered?

23 A Well, you've got a dissem and treasury  
24 establishment officer and, yeah, you'll have...

25 Q That's another -- it looks like that area has



1 another two people planned for it with an office  
2 next-door with another one person?

3 A Yeah. Well, you'll actually have one person  
4 that will sit in there, but occasionally he'll have  
5 another staff member come in and he will see and  
6 interview that person.

7 Q So that's basically a one-person office?

8 A Yes.

9 Q There's a little anteroom to that office.  
10 Does that also have room for a staff person to sit or is  
11 that for some other use?

12 A Oh, no, this is -- it's not manned or  
13 anything. Nobody sits there. Looks like it's just for  
14 a desk.

15 Q Right.

16 A In case a staff member or a parishioner wants  
17 to come and write a letter to the executive director  
18 international, they will come and sit down at that desk.  
19 It's not an occupied space per se.

20 Q Okay. So we have dealt with the first floor.  
21 Just to keep things simple, we're going to pull the  
22 first floor away and put it over here. And I'll be  
23 responsible for reorganizing the plans later. How about  
24 that?

25 A Okay.

1 Q The next sheet is A00.22 which is the level 2  
2 plan and we need to find the corresponding two plans  
3 that are larger for the level 2.

4 A They're not here.

5 Q Maybe they're under here.

6 A Which floor is that?

7 Q 2.

8 A Second floor?

9 Q Mm-hmm. Do you have the second floor right  
10 there?

11 A This says level 2.

12 Q You should have two. You should have one for  
13 the east side or north and one for the south side of the  
14 building.

15 A Yeah. This is the one.

16 Q I'm going to be looking at this while you're  
17 looking at those together and we're going to do the same  
18 thing on this floor.

19 A Great.

20 Q Starting on the right-hand side of the plan,  
21 we have what looks to be four areas in that wing.

22 A Yep.

23 Q On the front of the building we have 48 seats  
24 at tables plus what looks like three more chairs and two  
25 desks. What is that area used for?

1           A     That is the Academy. Is it practical? Yeah.  
2     It's the Academy practical course room. And those that  
3     are enrolled on the Academy courses would do their  
4     practical drilling in that course room.

5           Q     Okay. And the three seats that are by  
6     themselves, are they things that people would move to or  
7     are those extra seats for extra people?

8           A     They would move to. In other words, in  
9     practical sometimes you have drills that you sit in a  
10    single chair and would do a drill, you know, in that  
11    seat. So they're not extra ones but they're -- these  
12    people may occupy those chairs.

13          Q     Are there staff members who sit in these two  
14    positions who are in the room with people while they're  
15    in here?

16          A     Yes.

17          Q     Okay. So we've got 48 plus two is 50  
18    occupancy for that room?

19          A     Yes. Correct.

20          Q     Then the room on the very end has 46 seats at  
21    tables plus another two spots. What is that room for?

22          A     That's the Academy theory course room.

23          Q     Okay. And do people -- would there be people  
24    in the Academy theory room and the Academy practice room  
25    at the same time?

1           A     Yes.

2           Q     Okay.  So that would be another 50 people who  
3 could be in this room at one time; is that correct?

4           A     Yes.  But just to be clear, these people, they  
5 start the course here and they move in here.

6           Q     Okay.

7           A     Because they do the theory portion of the  
8 course in here and then they will come over here.  It  
9 could be any number of times during the course and  
10 during the study period that they may actually come in  
11 here to do drills.

12          Q     Okay.  So let me ask you about how that works.  
13 We've been given a schedule that has classes being given  
14 in two-hour blocks, or we've been told that they operate  
15 in two-hour blocks.

16                 So if someone is taking a course that would be  
17 in the Academy room, is that course likely to require  
18 them to show up more than one time for that block or is  
19 it going to be, like, a two-hour course and it's over  
20 and done with?

21          A     It depends on the schedule.  If I understand  
22 your question correctly.  If you -- let's say your study  
23 period is in the evening from 7:30 to 10:00.

24          Q     Okay.

25          A     That person would come to course and perhaps

1 he's on a section of the check sheet where it's  
2 practical. He would come straight into the practical  
3 course room and start practical. If he's on a section  
4 of theory, he'd come into the theory portion. And he  
5 may move within that time slot depending on where he's  
6 at on the check sheet.

7 Q Okay. So everyone would start in the theory  
8 room at the start of that course, but they will progress  
9 through that course at different rates, and some of them  
10 may move and other people may come in and start in the  
11 theory room at different times; would that be accurate?

12 A Yes.

13 Q So while it's not necessarily 50 in one room  
14 and 50 in the other room, it's not necessarily 50  
15 overall that occupy both rooms; you could simultaneously  
16 have different groups of people start at different times  
17 and both rooms could be fairly occupied; is that right?

18 A Yes. Mm-hmm.

19 Q Okay. Then the room that's on the back of  
20 that wing, what is that for?

21 A This is the Academy co-audit course room.

22 Q And that has 24 seats plus what appears to be  
23 another kind of station?

24 A A supervisor.

25 Q Supervisor. Okay. And that room would hold

1 that many people; is that correct?

2 A Correct.

3 Q Moving to the central core of the building --

4 A If I could just tell you one other thing on  
5 that.

6 Q Yes.

7 A Just on the Academy. See, all this is part of  
8 the same course.

9 Q Okay.

10 A Okay. And these people starting in theory  
11 again will be in here at some point doing practicals and  
12 they will also be in here at a certain point doing the  
13 co-auditing portion of that course.

14 Q Okay. And how, you know, how -- I understand  
15 this is a difficult question to answer, and it's not an  
16 easy question to ask because I can't figure how to  
17 phrase it.

18 How long would an average course take someone  
19 to work through with all the practicum components of  
20 that course?

21 A Yeah. That is difficult because there is a  
22 check sheet time. In other words, on a check sheet it  
23 will say it takes, you know, approximately this amount  
24 of time or this many hours of study. So depending --

25 Q For the entire course or for a piece of the

1 course?

2 A I'd have to look at a check sheet. Usually it  
3 will give for the entire course, but it also sometimes  
4 could say for a portion of the course too. Like a  
5 theory section, you know, could say takes X amount of  
6 hours approximately. That's an average, I mean. You're  
7 not going to know how fast every single person is going  
8 to study the course, you know.

9 So, you know, I can't really answer that  
10 question. I'd have to -- I'd literally have to look at  
11 a check sheet and I could tell you off a check sheet.

12 Q Well, I guess what I'm trying to figure at is,  
13 on any given course is someone likely to be in the  
14 theory room for more than one session?

15 A When you say "session," like study period?

16 Q I'm trying to figure out how involved your  
17 courses are. I understand they may vary.

18 A Yeah.

19 Q But I don't know if these courses are like,  
20 you know, in a session or two you can get through this  
21 course and it's over or if you're going to work a course  
22 over the space of several months or if there's something  
23 in between.

24 A The Academy -- and again, there's different  
25 levels in the Academy. You've got level zero, 1, 2, 3,

1 4. So you're doing, say, the level zero course. Yeah,  
2 that could be up to -- you know, again it's a bit  
3 conjecture because I haven't looked at the check sheets.

4 But you could be in the theory area for a  
5 week, two weeks. It could take about that long, you  
6 know. Division 6 course, one of the introductory  
7 courses are much shorter than the Academy. These are  
8 more professional training for an Auditor.

9 Q And I didn't understand the last part of what  
10 you said. Are the introductory courses longer or the  
11 professional courses longer?

12 A The professional courses, yes.

13 Q So the introductory things are intended to be  
14 shorter so that you can complete a segment?

15 A Yes.

16 Q Whereas when you get higher the courses take  
17 longer and they take longer to work through?

18 A That's an accurate statement.

19 Q Okay. All right. Moving to this middle  
20 section of the second floor, in the front right corner  
21 looking at the plan, what is designated for that space?

22 A That is the TRs and objectives course room.  
23 I'm sorry. I know you don't know what those terms mean.

24 Q I don't. But it has a function. And it has  
25 24 seats in a block. Then it has either four or six



1 seats. I can't read your plan. And another six places  
2 in the room. So tell me how this works.

3 A So basically the TRs portion of this course  
4 you would do here. And you would again --

5 Q In the main block seating area?

6 A Correct. And you would -- I see you're  
7 correcting me for her.

8 Q For her. Not for you.

9 A No. So in this section you would have twins,  
10 two people, and they'd sit across from each other and  
11 they would do training drills, training routines, TRs.  
12 Okay.

13 When they are done with that section, they  
14 would -- here would be a space that you would do the  
15 objective portion of the course. And these are  
16 ambulatory. So you have two people. These same two  
17 people doing the drills standing up in this area.

18 Q Okay.

19 A And this also I would have to actually look at  
20 the space plan that has some more labels and stuff on  
21 it. I'm sure there's got to be one. That's probably  
22 another section where you would do different objective  
23 drills, processes there.

24 Q Okay. So is it fair to say that basically 24  
25 or 25 people with a monitor is the maximum that's going

1 to be in that room at any one time?

2 A Yes. That's fair.

3 Q Okay. All right. And then behind there we've  
4 got what looks like an office just off the hall.

5 A Mm-hmm.

6 Q What's that for?

7 A That's the director of training. And he is  
8 the person on the organizing board that is in charge and  
9 responsible for that whole training department.

10 Q Okay.

11 A Yeah.

12 Q So that's basically one person. He has two  
13 chairs because he may have people talking to him from  
14 time to time, but it's basically a one-person office,  
15 right?

16 A Correct.

17 Q And then behind there there's another room  
18 with --

19 A That's --

20 Q -- 20 seats.

21 A Yes.

22 Q Is this another auditing?

23 A That's -- no. That's another TRs course room.  
24 That's professional TRs. It's a different course. When  
25 you're doing Professional Auditor training, you will do

1 a professional TRs course. Yes.

2 Q So 20 is a practical maximum for that room as  
3 well?

4 A Correct.

5 Q Then there is a room that doesn't show much in  
6 it on this plan on the very back of the main level.

7 A Must be this one.

8 Q That one right there. What is that?

9 A That is the course room for Upper Indoc TRs.  
10 Again, that is another TRs course room that -- you do  
11 different types of TRs and drills in this course room  
12 than you do in that one. In that one you see no seats  
13 probably other than a supervisor. That is because those  
14 Upper Indoc TRs are done ambulatory. You're standing  
15 up.

16 Q So given there aren't seats but there is  
17 activity, would the projected load of that room be  
18 similar to the load where people are seated, the same  
19 number of people can be working at the same time?

20 A I would say as an approximation, yeah.

21 Q So we're looking probably at 20 people again?

22 A Yeah.

23 Q Then to the left of there on the plan you have  
24 several areas that look to be offices.

25 A Yeah. These are staff office, qualification

1 executive office, this is the case supervisor office.

2 Yeah. You'd have people sitting in these desks per the  
3 desk setup there.

4 Q So you've got about four offices that are  
5 offices for people to work in?

6 A Correct.

7 Q Then crossing the hall toward the front of the  
8 building on that same central area, what is here  
9 (indicating)? Those are restrooms?

10 A No. No. That's part of the Qualification  
11 Division and those are where you do exams. You'll have  
12 an office for the director of that department, the "dir"  
13 of exams here. And you'll see here you've got looks  
14 like three seats and a little table there. That is  
15 where a person will come and do an exam. Once you're  
16 done with a course, you'll get an exam to make sure that  
17 you fully got the course.

18 Q Okay.

19 A Yeah.

20 Q So that area is basically a four-person area?

21 A Yes.

22 Q Okay. Then on the very front corner of that  
23 central section again we have several tables with four  
24 chairs apiece. What is that area designated for?

25 A That's a café.

1 Q Okay. And I would assume that if people are  
2 there for the café, they're there for other purposes and  
3 they just take a break and go to the café?

4 A That's correct.

5 Q Would that be fair? So we're not going to  
6 count that.

7 A Right.

8 Q Coming down to the far left wing which is  
9 here, let's start in the back. We've got two tables  
10 that seat 12 people plus what appear to be four other  
11 stations, 16. What is that room?

12 A That's a qualifications library. And you will  
13 have as a library you have Scientology materials in  
14 there and that's a place that you will go and can go.  
15 By way of example as I said the Qualification Division  
16 ensures the technology is being done correctly. For  
17 instance, you'll take an exam after you completed a  
18 course. And say you didn't score very well. You missed  
19 something. Okay. So you'll go up in that area and  
20 you'll see one of these people and you'll get what's  
21 called "word clearing." So they'll find what you missed  
22 in the course.

23 Q Okay.

24 A It will clear you up on what you missed. And  
25 these tables will be -- this person once he's done with

1 that, he may give him an assignment to do, to go back  
2 and restudy some of the material which you would do at  
3 one of those tables.

4 Q Okay. So you've got two people who are  
5 working in this room --

6 A (Witness nods head.)

7 Q -- dealing with people on the opposite sides  
8 and spillover of people who are getting some  
9 reinforcement for what's been corrected?

10 A Yeah. Exactly. You'll have -- like I said,  
11 you'll have, you know -- it's really for the purpose  
12 of -- you can always go there if you want to look up  
13 something. But generally speaking if someone needs some  
14 sort of corrective action, they will go there.

15 Q All right. So we're looking at a possibility  
16 of 16 people in this room at any one time; is that  
17 correct?

18 A Per -- I trust your count there, yes.

19 Q Then the room on the end of the building  
20 directly next to that one has ten seats. What is that  
21 room for?

22 A That's the internship course room. And the  
23 internship is essentially when you're training to be a  
24 Professional Auditor, you will do an internship. And  
25 that's under the supervision of an intern supervisor and

1 you will -- you will do auditing processes under that  
2 internship that's monitored by the intern supervisor to  
3 make sure you've got -- you've really got it correct.

4 He will observe that person. And again, if  
5 you flunk something, you know, doing some procedure not  
6 correctly he'll go over here and he'll get what we call  
7 cramming. He'll get word clearing and so forth that  
8 will correct him on that procedure. He'll go back and  
9 do it again. Once he's passed, then you complete the  
10 internship. Then you're an actual Certified  
11 Professional Auditor and then you don't need to be  
12 supervised by that person anymore.

13 Q Okay. And this looks like it would handle 12  
14 people plus someone that the supervisor is directly  
15 working with at one point; is that what it looks like?

16 A Yes.

17 Q So about 14 people is the maximum occupancy  
18 for that at any one time?

19 A Yes, ma'am.

20 Q Then in front of that room is what?

21 A That's personal procurement. Okay. So now  
22 we're getting into the HCO Division. This whole area is  
23 HCO Division. That is the Department 1. One of the  
24 functions in Department 1 where you'll interview new  
25 potential staff members. You'll sign them up for staff.

1 Q So this, all the front half of this wing is  
2 all administrative; is that correct?

3 A Yes. That's correct.

4 Q After these two retraining areas, everything  
5 here is administrative?

6 A Yes.

7 Q It shows as 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11,  
8 12, 13, 14 -- 16 seats, actually 17 in that area.  
9 Should that adequately handle the administrative  
10 component of that function?

11 A Yes.

12 Q Let's put that floor aside. This was 2,  
13 right?

14 A Yes. That's 2.

15 Q Now we're going to the attic, level 3. You  
16 should have two diagrams on that as well.

17 A Yes.

18 Q Okay.

19 A Do I have it right?

20 Q Yes. You have it right. My understanding, if  
21 I remember correctly, is that this area is primarily  
22 offices and some individual auditing offices; is that  
23 correct?

24 A Yeah. These are auditing rooms here  
25 (indicating). That's what this whole section is.



1 Q All right. If you count the number of seats  
2 that are on here, would that be the maximum occupancy  
3 for this area of the building as it's going to be used  
4 by Scientology?

5 A Yes.

6 Q Okay. We'll go back to the basement.

7 A Okay. That's the roof plan. I don't have  
8 that. But that's okay.

9 Q I don't need the demo plans. I don't care  
10 about demolition. We're now down on the ground floor.  
11 And it goes like so (indicating).

12 A Okay.

13 Q So looking at the far right side first, there  
14 is a large room with some tables and seating in it.  
15 What is that room designated for?

16 A It says conference room and executive offices.

17 Q Okay. Can you -- looking at that, it looks  
18 like the front 60 percent or so is all kind of related.  
19 Is that how it appears on your plan?

20 A Well, these are all offices. These are all  
21 executive type offices here. Actually, yeah.

22 Q That whole wing, in fact, looks like it's  
23 pretty much all offices.

24 A Yeah. Except for this is storage room here  
25 (indicating).

1 Q Okay.

2 A But the rest of it, yeah, this is storage,  
3 mechanical, files. But this whole wing is executive  
4 offices. Yeah.

5 Q What does it look like the maximum occupancy  
6 for its intended use would be in that wing if we look?  
7 If we look at this -- I'm going to let you figure that  
8 out.

9 A Yeah. It would be per this. So you'd have --  
10 actually what is that? Executive office. Okay. So you  
11 have 1, 2, 4, 5. Looks like that may be a desk. That  
12 would be 6, 7, 8, 9. There would be 23 here.

13 Q Okay. When you say this "here," we're talking  
14 about the right wing, the front two-thirds of that wing  
15 more or less?

16 A Correct.

17 Q Okay.

18 A And then moving back from that which is the  
19 Div 6C executive office, you would have 1, 2, 3, 4, 5, 6  
20 in that office.

21 Q All right. Moving to the opposite end of the  
22 ground floor, let's look at what is planned for this  
23 area (indicating). This is the left-most wing as you're  
24 looking at the plans from the front.

25 A Okay. So you've got -- this is what's called

1 the central files area. That's all the files of  
2 parishioners basically here, anybody who's enrolled,  
3 basically. So that's files. And you'd have the letter  
4 registration. So you'd have letter registrars. People  
5 sitting here that will basically be writing letters to  
6 those, the people in those files to stay in touch with  
7 them and so forth.

8 Q And I count nine seats in that area. Does  
9 that sound about right?

10 A Yes.

11 Q Then on the edge of that wing along the side  
12 what are the uses that are planned for that?

13 A Well, this says existing cell phone tower and  
14 electrical room.

15 Q We're probably not going to put anybody in  
16 there.

17 A Right. The other one is estates office. So  
18 you'll have people responsible for maintaining the  
19 property, estates personnel.

20 Q That's basically administrative staff?

21 A Yes.

22 Q Another four seats are shown in that area?

23 A Yep. That's right.

24 Q Okay. And then directly to the side of the  
25 estates office is what?

1           A     That's book stocks. That looks like a high  
2 density or shelving unit here that would -- you would  
3 basically store and stock books.

4           Q     And one person to kind of pull stuff out when  
5 it's needed, right?

6           A     That's right.

7           Q     Along the back of that left wing what do you  
8 have?

9           A     That's a promotion storage. So if you print  
10 some promotion pieces that you want to mail, that will  
11 be storage for that.

12          Q     And the final aspect of that wing which has  
13 seating for five people?

14          A     Yes.

15          Q     What is there?

16          A     That's a Department of Promotional Marketing.  
17 They're the people that would be designing the  
18 promotion, getting it produced and so forth.

19          Q     Okay. Coming back toward the central wing  
20 there's a small assembly here with 24 seats in it. What  
21 is that assembly room for?

22          A     That's a seminar room. And on here it's PE  
23 and anatomy of the human mind seminar. So anybody that  
24 would want to do that seminar, the PE seminar, they  
25 would be in there, seated in there and you'd have one

1 person at the front that would be delivering that  
2 seminar.

3 Q Okay. So besides the person at the front, the  
4 seating in there would demonstrate the maximum capacity  
5 of that room for its intended use; is that right?

6 A Correct.

7 Q And then there is a somewhat larger assembly  
8 room but smaller than the main chapel next to that.  
9 What is that for?

10 A That's another seminar room called the  
11 Dianetics seminar room. So if you enroll on the  
12 Dianetics seminar, that would be delivered in that  
13 space.

14 Q Okay. That's 48 seats in that room?

15 A (Witness nods head.)

16 Q Does that, the size of those two rooms  
17 correspond to other ideal org facilities for similar  
18 type uses?

19 A I'd have to look at them, but, you know, other  
20 plans, but generally speaking I'd say yes.

21 Q Okay. And then we have a central area that's  
22 been designated as the chapel.

23 A Mm-hmm.

24 Q Around 126 seats in it as it's shown on here.  
25 How does that correspond with the size of chapels in

1 other facilities?

2           A     It varies, you know. Sometimes it will have  
3 bigger ones. Depends on the size of the building  
4 obviously. And the layout. Each building gets  
5 individually space planned and configured to suit that  
6 building the best in terms of, you know, for instance, I  
7 mean, the chapel in here is on the ground floor. That's  
8 most suitable for this building. Sometimes it will be  
9 on a different building. But, you know, it's -- it  
10 varies. In our Rome one is bigger than that.

11           Q     Then surrounding the chapel on the other side  
12 in the back are rooms with tables again. Let's go  
13 through the use of those rooms starting from the front.

14                     To the left of the chapel there are six tables  
15 for -- or three tables for four, 12 seats, plus a  
16 monitor or staff person.

17           A     Mm-hmm.

18           Q     What is that room for?

19           A     That's a life orientation course course room.

20           Q     And so would 12 participants plus an  
21 instructor be the appropriate size for that room or the  
22 maximum size for that room?

23           A     Yes.

24           Q     The office directly behind there has another  
25 12 seats plus an instructor. What is that room for?

1           A     That's the key to life course. That's a  
2 different course.

3           Q     And that room again would have a capacity of  
4 12 students and one instructor at one time the way it's  
5 configured here?

6           A     Correct.

7           Q     And then directly behind there I can't tell  
8 what that is.

9           A     That's a chaplain's office.

10          Q     Okay. So that's an office for one person?

11          A     Mm-hmm.

12          Q     Then along the back side of the building what  
13 do we have?

14          A     You have the success office and you have the  
15 volunteer minister and field staff member in charge  
16 office. Those are -- I think I explained those  
17 functions to you briefly in the organization board.

18          Q     Okay. Then we have this central thing and I  
19 can't tell looking at this what's in the middle.

20          A     This one here (indicating).

21          Q     Yeah.

22          A     So that's -- I think I explained to you  
23 earlier that's an FSM lounge. That's the space  
24 designated for these field staff members.

25          Q     Okay.

1           A     Who would come and have a meeting there,  
2 something like that.

3           Q     Okay. And then is this area here in the back  
4 corner of the upper right-hand corner of that central  
5 section of the lower level, is that part of that lounge  
6 area or is it something else? You're in the right  
7 place.

8           A     That is -- well, this is the lounge itself.  
9 Then you have the "dir" clearing. That's the director.  
10 That's the head of the whole department here which would  
11 be his office with it looks like one more person. Yeah.  
12 Right there. Yeah. So you've got two people sitting  
13 there. And then you have here is the director of public  
14 relations office right there.

15          Q     Then what is this here directly in front of  
16 that?

17          A     Right here?

18          Q     Yeah.

19          A     That says café here.

20          Q     Maybe we've got another café.

21          A     Yeah. Looks like it.

22          Q     You can eat on every floor.

23          A     Yeah.

24          Q     I'm going to let you sit down. How about  
25 that?



1           A     Okay. Great.

2           Q     I'm almost done. Do you want to take another  
3 break or you want to go on?

4           A     I'm fine.

5                     MR. MOXON: Why don't we take a two-  
6 minute break.

7                     (A recess was taken from 1:52 to 2:02 p.m.)

8           Q     (By Ms. Henderson) Mr. Wright, I need to  
9 clarify something just so that we've got a clean record.  
10 The problem with me asking questions from memory and not  
11 looking things up is I may not remember accurately and  
12 that's what we've got here.

13                     Miss Danos testified that they start a morning  
14 period at 9:30 and go until 12:00 and then pick up again  
15 at 1:00 and break at 3:15. There's another session from  
16 4:00 to 6:00. And then there's an evening session from  
17 7:00 to 9:30. On the weekends it's 9:00 to noon, and  
18 then 1:00 to 3:45, and another at 4:00 to 6:00.

19                     So there are various lengths of sessions, some  
20 three, three and a half hours, some two hours. And I  
21 think I asked you a question assuming everything was in  
22 a two-hour block. And that's not the case.

23           A     Right.

24           Q     But I think my question still stands: In each  
25 of these time periods there may be people starting a

1 course at a different place than someone else in that  
2 time period that's taking that course; is that correct?

3 A I want to make sure I'm understanding your  
4 question. So basically what you're saying is you could  
5 have, say, in the morning slot a certain number of  
6 people, or certain individuals come on that slot and  
7 then different people coming at a different time?

8 Q Let me try to do better because it was a poor  
9 question. This probably won't be much better but I'll  
10 try.

11 A Okay.

12 Q Let's say a class starts at 9:00 a.m.

13 A Mm-hmm.

14 Q And you can take this course from the 9:00  
15 to -- 9:30 to 12:00 o'clock block. And in this course  
16 you have people that started a week ago, you have people  
17 that started yesterday, and you have someone who comes  
18 in today. They're all taking the same course at the  
19 same time. But they may be in different rooms depending  
20 upon whether they're doing theory or the practical  
21 stuff. Is that possible?

22 A Yeah. That's possible. Yes.

23 Q Okay. That's what I was trying to get at.

24 A Okay.

25 Q Recognizing that it may not all be flat

1 two-hour slots. So thank you. Do you happen to know  
2 what the square footage is in the Seattle ideal org?

3 A Seattle I think combined has actually got two  
4 buildings. And combined -- I would have to look that  
5 up. But I think it's probably 43,000 possibly, 44,  
6 something like that. Again, I'll have to look that up  
7 because I don't know off the top of my head. Again,  
8 that's two buildings actually.

9 Q Are those two buildings next-door to one  
10 another?

11 A No. They're not.

12 Q How far apart are they from one another?

13 A The one is I would say probably like a  
14 five-minute drive, I think.

15 Q Okay. And what about the Pasadena facility,  
16 do you know how big that is?

17 A Yeah. That one is approximately 58,000.  
18 Again, these aren't exact numbers, but it's  
19 approximately 58,000 square feet.

20 Q What is the size, if you know, of the Mexico  
21 City facility?

22 A That one is I believe about 49 -- close to  
23 49,000.

24 Q Of the ideal orgs that are identified on  
25 Exhibit 14, are any of those in more than one building?

1           A     No.  Except for Tampa.  And Tampa again we  
2     just purchased a new building and that one will be  
3     housed, everything will be housed in that one building.  
4     Currently as it stands you do have the main building and  
5     you have right across the street from it another  
6     building.

7           Q     Okay.

8           A     Yeah.

9           Q     All right.

10          A     But all the other ones are in the same  
11     building.

12          Q     You mentioned in this building the basement  
13     was the best place to put the chapel.  Why was that?

14          A     I don't think I mentioned that.  I said it  
15     looks to me like that was the best place.  I didn't  
16     space plan it.  I'm saying it could have been the best  
17     place here.  In some other -- the space planner could  
18     have space planned any configuration that works the best  
19     with the building.

20          Q     Do you know any reason why the chapel was  
21     space planned to be on the ground floor?

22          A     I actually don't.  Again, I didn't space plan  
23     it.

24          Q     Okay.

25          A     I could only speculate as to why.

1 Q Okay. As CSI's experience with ideal orgs has  
2 expanded over time, how long does it take one of these  
3 facilities to come up to a -- first of all, are any of  
4 your ideal orgs operating at a capacity level?

5 A I'm not sure what you mean by "capacity  
6 level." Do you mean --

7 Q Do you consider them full?

8 A Oh, full. You know, I don't know. I'd have  
9 to analyze the current statistics and so forth of  
10 what -- how many people are in each class and so forth,  
11 you know. I build them. I don't manage them. That's  
12 my department.

13 Q What kind of reporting comes to your office  
14 from the ideal orgs, if any?

15 A I don't get any reports to my office on the  
16 ideal orgs. After they're opened, that's handled by  
17 other individuals in the church that manage the  
18 organizations.

19 Q Okay. All right. Two of these ideal orgs on  
20 Exhibit 14 --

21 MR. MOXON: I'm sorry. Can I interrupt  
22 you one more time just for one minute? May I speak  
23 to you? Before you get into your next question.  
24 Just a second.

25 (A recess was taken from 2:08 to 2:09 p.m.)

1 Q (By Ms. Henderson) Mr. Wright, the Los Gatos  
2 facility that's listed on Exhibit 14 at 25,000 plus  
3 square feet, the note says, "Needs additional space, a  
4 new building is being searched for."

5 A That's correct.

6 Q How long has that site needed more space? How  
7 long has that search been going on?

8 A I actually don't know when that was built.  
9 See what it says here. 2003. I mean, in terms of a  
10 search of a new building, I don't know. I'm trying to  
11 think here. I would probably say that's -- you know, by  
12 the way, I don't know who provided this document, but --

13 Q I don't know either.

14 A You know, in terms of search for a new  
15 building, that's not necessarily accurate 'cause we're  
16 looking to expand that building, building an addition to  
17 the building.

18 Q Okay.

19 A So we get the square footage.

20 Q But the square footage at this point has been  
21 determined by someone to be inadequate; is that correct?

22 A Absolutely. Yes.

23 Q Okay. And how long has that determination of  
24 inadequacy been in existence?

25 A I don't know how to put a date on that. You

1 know, like I said, this has been an evolution. That was  
2 one of the original pilot -- during the pilot time  
3 period that that building was purchased. Like Tampa.  
4 And, you know, as the program evolved to make this sort  
5 of determinations, you know, somewhere along that time,  
6 time period I guess.

7 Q Since the two years that you have been in this  
8 present position with CSI has there been a search for  
9 more space for Los Gatos that whole time?

10 A No.

11 Q Okay.

12 A Like I said --

13 Q How long has there been a need for more space  
14 at that facility?

15 A I'd have to guess. I would say -- well, let's  
16 put it this way. When that building was purchased,  
17 renovated and opened, we did not have the full plan of  
18 what needed to go in an ideal organization finalized.  
19 In other words, what are all the different course rooms  
20 that really do need to be in there and all the different  
21 services, the display areas and so forth. So that  
22 wasn't determined. And, you know, to put a date on when  
23 it was determined, you know, a few years.

24 Q Well, when you first took your present  
25 position, was there already a search underway --

1 A Well --

2 Q -- for more space there?

3 A I personally wasn't involved in a search. I  
4 mean, it's known that it's too small, you know. It is  
5 known to be too small and we need additional space.  
6 Again, I wasn't involved in it at the time. But yeah.

7 Q What about the San Francisco building at  
8 29,000 square feet. The note says, "Another building  
9 has been found, needs negotiating."

10 A We have got a couple of options that we're  
11 looking at, yes.

12 Q Is that similar to the other situation where  
13 the initial building was just too small to ever  
14 accommodate what you're trying to do?

15 A That's correct.

16 Q Okay. What happens when one of the larger  
17 buildings reaches capacity? What is Scientology's plan  
18 when that happens?

19 A You'll open up new churches.

20 Q Okay. I mean, the possibilities is, for me,  
21 you either move to something bigger, expand to something  
22 bigger or you start a new church and --

23 A Yes.

24 Q So that's my question.

25 A Yeah. That's right.



1 Q How old is the Nashville site?

2 A I'm not sure when that building was purchased.

3 MR. MOXON: Objection to the form of the  
4 question.

5 Q (By Ms. Henderson) The current ideal org in  
6 Nashville, do you know how long that building has been  
7 in use?

8 A We opened it in I believe April 2009.

9 Q And who would have information as to how many  
10 people are using that building on a regular basis?

11 A The local, the local church members would at  
12 that location.

13 Q Do local churches report those figures to CSI?

14 A They report them to their local management  
15 which is the continental liaison office for that  
16 respective part of the country.

17 Q And who would -- is Atlanta governed by the  
18 same continental liaison office as Nashville?

19 A Yes.

20 Q And is Buffalo governed by that same  
21 continental liaison office?

22 A Yes.

23 Q And who is that person?

24 A Well, it's a whole office. It's not just one  
25 person.

1 Q Where is that office located?

2 A That is in New York.

3 Q Okay. And you had given me the name earlier  
4 of someone in New York. Is that person in that office?

5 A He -- yeah. He is a local estates person  
6 there that deals with properties in the eastern United  
7 States. However, since you mentioned him, I was  
8 thinking he -- this building I'm pretty sure was  
9 acquired before his time.

10 Q That's Brian Jasper we're talking about?

11 A I don't think he was involved in it at all.

12 Q Is there -- are there records in your office  
13 from the time period around 2004, 2005 that might be  
14 related to this site in any way?

15 A It's very possible. I personally have not  
16 seen them. It's very possible they exist.

17 Q Is there some way to do a search to find out  
18 whether you have any records related to this --

19 A Sure.

20 Q -- particular site?

21 A Sure. Sure.

22 Q Okay. I think that's all I've got. Thank you  
23 very much.

24 A That's it?

25 Q That's it.

1 A I had a couple things for you.

2 Q Good luck with that.

3 A Only kidding. Now just to clarify a couple  
4 things. I mentioned earlier when I was talking about  
5 missions, about SMI, Scientology Missions International  
6 and being part of CSI.

7 That's not a correct statement. Just so you  
8 know. SMI is a totally separate ecclesiastical identity  
9 basically. It's really the simple fact it's not part of  
10 CSI. That was it.

11 I'm not a identity person. But I do know  
12 that. It's kind of -- it's not really relevant.

13 Q Do I take it, then, that CSI is not the top of  
14 the pyramid in terms of organizational structure of  
15 Scientology?

16 A No. Everything I've said otherwise is  
17 completely correct. It's literally SMI when I was  
18 relating to missions. It's a matter of, you know,  
19 corporate identity. That's all I'm really referring to.

20 Q I'm trying to find out are they totally  
21 autonomous and independent from CSI or do they report to  
22 CSI?

23 A No. They're -- well, they're autonomous.  
24 They would report to CSI.

25 Q Okay.

1           A     Yeah.

2           Q     All right.  So they're autonomous, but they --  
3     CSI is still the head organization in the Scientology  
4     world?

5           A     Yes.  That's correct.

6           Q     Okay.  All right.  Was there anything else you  
7     want to clarify?

8           A     Just on Dianetics and Scientology.  When I  
9     read you that definition and explained on that, I want  
10    to make sure you were clear on the fact that Dianetics  
11    is part of Scientology religion in case you had any  
12    question on that.  Dianetics and Scientology is part of  
13    the Scientology religion.

14          Q     All right.  Okay.

15                   MS. JONES:  Let's break one more time  
16    before we close up this deposition to make sure he  
17    has told you everything correctly.

18                   (A recess was taken from 2:18 to 2:21 p.m.)

19                   MS. HENDERSON:  All done?

20                   MS. JONES:  All finished.

21                   (The reading and signing of the deposition by  
22    the witness was reserved.)

23                   (Deposition concluded at 2:21 p.m.)

24

25

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
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20		_____	ROBERT M. WRIGHT
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 133 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 10th day of August, 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: Robert M. Wright  
COUNTY OF COBB:            Date: August 6, 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:

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This, the 10th day of August, 2010.

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Kimberly S. Bennett, RPR, CRR, CBC, CCP  
CCR No. B-1172