

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

99 MAY 24 PM 1:35

CARLOS WIENKE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

IN RE: THE MATTER OF THE
APPLICATION OF RELIGIOUS TECHNOLOGY
CENTER AND BRIDGE PUBLICATIONS, INC.
FOR A SUBPOENA TO IDENTIFY INFRINGER
PURSUANT TO 17 U.S.C. § 512(h)

99-8388
Case No.

(Plaintiff)
vs.
(Defendant(s))
)
)
)
)
)
)
)
)
)

(To be assigned at time of filing)
DIV. HURLEY MAGISTRATE JUDGE
LYNCH

REQUEST FOR
ISSUANCE OF SUBPOENA

(Title of document)

I, ROSANA E. HERNANDEZ ~~plaintiff~~, in the above-styled cause, ~~am~~
REQUEST THE CLERK OF THE UNITED STATES DISTRICT COURT
~~to issue a~~; FOR THE SOUTHERN DISTRICT OF FLORIDA TO ISSUE A
SUBPOENA IN ACCORDANCE WITH 17 U.S.C. § 512(h).

(Allegation of jurisdiction, i.e., under which federal law or section of the U.S. Constitution
this action is being filed)

This action is filed under: SECTION 512(h) of Title 17 of
THE UNITED STATES CODE.

DECLARATION OF AVA M. PAQUETTE

I, Ava M. Paquette, declare and state as follows:

1. I am an attorney at law duly licensed to practice in all of the courts of the State of California. I am counsel from the law firm of Moxon and Kobrin, which, along with the Florida law firm of Zuckerman, Spaeder, Taylor & Evans, LLP, represents Religious Technology Center (“RTC”) and Bridge Publications, Inc. (“BPI”) in this matter. The facts contained herein are true of my own personal knowledge and if called upon to testify, I could and would competently testify thereto.

2. I make this declaration pursuant to 17 U.S.C. § 512(h), which is one of the provisions of the “Digital Millenium Copyright Act” (the “Act”). That section of the Act states that “[a] copyright owner or a person authorized to act on the owner’s behalf may request the clerk of any United States district court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with this subsection.” A true and correct copy of 17 U.S.C. § 512 is annexed hereto as Exhibit 1.

3. RTC holds the exclusive right to the copyright in a certain unpublished, copyrighted work known as “Class VIII - Assists,” which is registered with the United States Copyright Office under registration number TXu

593 514. BPI holds the exclusive rights to the copyrights in certain unpublished works entitled "Enemy Names," "Amprinistics," and "Attacks on Scientology," which is registered with the United States Copyright Office under registration number Tx 264 306.

4. On May 22, 1999, I was informed that someone had made unauthorized, verbatim Internet postings of each of these copyrighted works under the e-mail address and name "proxenul@my-dejanews.com." Therefore, on behalf of RTC and BPI, I immediately notified Quickbyte, the Internet dial-up service provider through which the infringing postings were made, of these claimed infringements and requested the identity of the infringer.

5. In researching this matter further, our computer expert discovered that each of these postings included a PGP key. He was able to locate this PGP key on an MIT server which shows that this particular PGP key belongs to the user name "mantas6@bigfoot.com". A further search was done for any postings done by "mantas6" which revealed only one, a copy of which is attached as Exhibit 4. The NNTP Posting Host shows that the posting was made through Quickbyte. Thus, the evidence strongly suggests that "proxenul" and "mantas" are one and the same person or are working in concert to engage in using Quickbyte for copyright

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retroactive adjustment when a final rate or fee has been determined, in an amount equal to the industry rate, or, in the absence of an industry rate, the amount of the most recent license rate or fee agreed to by the parties.

(6) Any decision rendered in such proceeding by a special master or magistrate judge named under paragraph (3) shall be reviewed by the judge of the court with jurisdiction over the consent decree governing the performing rights society. Such proceeding, including such review, shall be concluded within 6 months after its commencement.

(7) Any such final determination shall be binding only as to the individual proprietor commencing the proceeding, and shall not be applicable to any other proprietor or any other performing rights society, and the performing rights society shall be relieved of any obligation of nondiscrimination among similarly situated music users that may be imposed by the consent decree governing its operations.

(8) An individual proprietor may not bring more than one proceeding provided for in this section for the determination of a reasonable license rate or fee under any license agreement with respect to any one performing rights society.

(9) For purposes of this section, the term "industry rate" means the license fee a performing rights society has agreed to with, or which has been determined by the court for, a significant segment of the music user industry to which the individual proprietor belongs.

(Added Pub.L. 106-298, Title II, § 208(a), Oct. 27, 1998, 112 Stat. 2331.)

1 So in original. Two sections 512 of this title have been enacted.

HISTORICAL AND STATUTORY NOTES

Effective Dates section 207 of Pub.L. 106-298, set out as a note under section 101 of this title.
1998 Acts. Amendments by Pub.L. 106-298, Title II, effective 90 days after Oct. 27, 1998, see

LIBRARY REFERENCES

Texts and Treatises
Business and Commercial Litigation in Federal Courts §§ 65.2, 65.3, 65.15.

§ 512¹ Limitations on liability relating to material online

(a) **Transitory digital network communications.**—A service provider shall not be liable for monetary relief, or, except as provided in subsection (j), for injunctive or other equitable relief, for infringement of copyright by reason of the provider's transmitting, routing, or providing connections for, material through a system or network controlled or operated by or for the service provider, or by reason of the intermediate and transient storage of that material in the course of such transmitting, routing, or providing connections, if—

(1) the transmission of the material was initiated by or at the direction of a person other than the service provider;

(2) the transmission, routing, provision of connections, or storage is carried out through an automatic technical process without selection of the material by the service provider;

(3) the service provider does not select the recipients of the material except as an automatic response to the request of another person;

(4) no copy of the material made by the service provider in the course of such intermediate or transient storage is maintained on the system or network in a manner ordinarily accessible to anyone other than anticipated recipients, and no such copy is maintained on the system or network in a manner ordinarily accessible to such anticipated recipients for a longer period than is reasonably necessary for the transmission, routing, or provision of connections; and

(5) the material is transmitted through the system or network without modification of its content.

(b) **System caching.**—

(1) **Limitation on liability.**—A service provider shall not be liable for monetary relief, or, except as provided in subsection (j), for injunctive or other equitable relief, for infringement of copyright by reason of the intermediate and temporary

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storage of material on a system or network controlled or operated by or for the service provider in a case in which—

(A) the material is made available online by a person other than the service provider;

(B) the material is transmitted from the person described in subparagraph (A) through the system or network to a person other than the person described in subparagraph (A) at the direction of that other person; and

(C) the storage is carried out through an automatic technical process for the purpose of making the material available to users of the system or network who, after the material is transmitted as described in subparagraph (B), request access to the material from the person described in subparagraph (A),

if the conditions set forth in paragraph (2) are met.

(2) Conditions.—The conditions referred to in paragraph (1) are that—

(A) the material described in paragraph (1) is transmitted to the subsequent users described in paragraph (1)(C) without modification to its content from the manner in which the material was transmitted from the person described in paragraph (1)(A);

(B) the service provider described in paragraph (1) complies with rules concerning the refreshing, reloading, or other updating of the material when specified by the person making the material available online in accordance with a generally accepted industry standard data communications protocol for the system or network through which that person makes the material available, except that this subparagraph applies only if those rules are not used by the person described in paragraph (1)(A) to prevent or unreasonably impair the intermediate storage to which this subsection applies;

(C) the service provider does not interfere with the ability of technology associated with the material to return to the person described in paragraph (1)(A) the information that would have been available to that person if the material had been obtained by the subsequent users described in paragraph (1)(C) directly from that person, except that this subparagraph applies only if that technology—

(i) does not significantly interfere with the performance of the provider's system or network or with the intermediate storage of the material;

(ii) is consistent with generally accepted industry standard communications protocols; and

(iii) does not extract information from the provider's system or network other than the information that would have been available to the person described in paragraph (1)(A) if the subsequent users had gained access to the material directly from that person;

(D) if the person described in paragraph (1)(A) has in effect a condition that a person must meet prior to having access to the material, such as a condition based on payment of a fee or provision of a password or other information, the service provider permits access to the stored material in significant part only to users of its system or network that have met those conditions and only in accordance with those conditions; and

(E) if the person described in paragraph (1)(A) makes that material available online without the authorization of the copyright owner of the material, the service provider responds expeditiously to remove, or disable access to, the material that is claimed to be infringing upon notification of claimed infringement as described in subsection (c)(3), except that this subparagraph applies only if—

(i) the material has previously been removed from the originating site or access to it has been disabled, or a court has ordered that the material be removed from the originating site or that access to the material on the originating site be disabled; and

(ii) the party giving the notification includes in the notification a statement confirming that the material has been removed from the originating site or access to it has been disabled or that a court has ordered that the material be removed from the originating site or that access to the material on the originating site be disabled.

(c) Information residing on systems or networks at direction of users.—

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(1) In general.—A service provider shall not be liable for monetary relief, or except as provided in subsection (j), for injunctive or other equitable relief, for infringement of copyright by reason of the storage at the direction of a user of material that resides on a system or network controlled or operated by or for the service provider, if the service provider—

(A)(i) does not have actual knowledge that the material or an activity using the material on the system or network is infringing;

(ii) in the absence of such actual knowledge, is not aware of facts or circumstances from which infringing activity is apparent; or

(iii) upon obtaining such knowledge or awareness, acts expeditiously to remove, or disable access to, the material;

(B) does not receive a financial benefit directly attributable to the infringing activity, in a case in which the service provider has the right and ability to control such activity; and

(C) upon notification of claimed infringement as described in paragraph (3), responds expeditiously to remove, or disable access to, the material that is claimed to be infringing or to be the subject of infringing activity.

(2) Designated agent.—The limitations on liability established in this subsection apply to a service provider only if the service provider has designated an agent to receive notifications of claimed infringement described in paragraph (3), by making available through its service, including on its website in a location accessible to the public, and by providing to the Copyright Office, substantially the following information:

(A) the name, address, phone number, and electronic mail address of the agent.

(B) other contact information which the Register of Copyrights may deem appropriate.

The Register of Copyrights shall maintain a current directory of agents available to the public for inspection, including through the Internet, in both electronic and hard copy formats, and may require payment of a fee by service providers to cover the costs of maintaining the directory.

(3) Elements of notification.—

(A) To be effective under this subsection, a notification of claimed infringement must be a written communication provided to the designated agent of a service provider that includes substantially the following:

(i) A physical or electronic signature of a person authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

(ii) Identification of the copyrighted work claimed to have been infringed, or, if multiple copyrighted works at a single online site are covered by a single notification, a representative list of such works at that site.

(iii) Identification of the material that is claimed to be infringing or to be the subject of infringing activity and that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit the service provider to locate the material.

(iv) Information reasonably sufficient to permit the service provider to contact the complaining party, such as an address, telephone number, and, if available, an electronic mail address at which the complaining party may be contacted.

(v) A statement that the complaining party has a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.

(vi) A statement that the information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

(B)(i) Subject to clause (ii), a notification from a copyright owner or from a person authorized to act on behalf of the copyright owner that fails to comply substantially with the provisions of subparagraph (A) shall not be considered under paragraph (1)(A) in determining whether a service provider has actual knowledge or is aware of facts or circumstances from which infringing activity is apparent.

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(ii) In a case in which the notification that is provided to the service provider's designated agent fails to comply substantially with all the provisions of subparagraph (A) but substantially complies with clauses (ii), (iii), and (iv) of subparagraph (A), clause (i) of this subparagraph applies only if the service provider promptly attempts to contact the person making the notification or takes other reasonable steps to assist in the receipt of notification that substantially complies with all the provisions of subparagraph (A).

(d) **Information location tools.**—A service provider shall not be liable for monetary relief, or, except as provided in subsection (j), for injunctive or other equitable relief, for infringement of copyright by reason of the provider referring or linking users to an online location containing infringing material or infringing activity, by using information location tools, including a directory, index, reference, pointer, or hypertext link, if the service provider—

(1)(A) does not have actual knowledge that the material or activity is infringing;

(B) in the absence of such actual knowledge, is not aware of facts or circumstances from which infringing activity is apparent; or

(C) upon obtaining such knowledge or awareness, acts expeditiously to remove, or disable access to, the material;

(2) does not receive a financial benefit directly attributable to the infringing activity, in a case in which the service provider has the right and ability to control such activity; and

(3) upon notification of claimed infringement as described in subsection (c)(3), responds expeditiously to remove, or disable access to, the material that is claimed to be infringing or to be the subject of infringing activity, except that, for purposes of this paragraph, the information described in subsection (c)(3)(A)(iii) shall be identification of the reference or link, to material or activity claimed to be infringing, that is to be removed or access to which is to be disabled, and information reasonably sufficient to permit the service provider to locate that reference or link.

(e) **Limitation on liability of nonprofit educational institutions.**—(1) When a public or other nonprofit institution of higher education is a service provider, and when a faculty member or graduate student who is an employee of such institution is performing a teaching or research function, for the purposes of subsections (a) and (b) such faculty member or graduate student shall be considered to be a person other than the institution, and for the purposes of subsections (c) and (d) such faculty member's or graduate student's knowledge or awareness of his or her infringing activities shall not be attributed to the institution, if—

(A) such faculty member's or graduate student's infringing activities do not involve the provision of online access to instructional materials that are or were required or recommended, within the preceding 3-year period, for a course taught at the institution by such faculty member or graduate student;

(B) the institution has not, within the preceding 3-year period, received more than two notifications described in subsection (c)(3) of claimed infringement by such faculty member or graduate student, and such notifications of claimed infringement were not actionable under subsection (f); and

(C) the institution provides to all users of its system or network informational materials that accurately describe, and promote compliance with, the laws of the United States relating to copyright.

(2) **Injunctions.**—For the purposes of this subsection, the limitations on injunctive relief contained in subsections (j)(2) and (j)(3), but not those in (j)(1), shall apply.

(f) **Misrepresentations.**—Any person who knowingly materially misrepresents under this section—

(1) that material or activity is infringing, or

(2) that material or activity was removed or disabled by mistake or misidentification,

shall be liable for any damages, including costs and attorneys' fees, incurred by the alleged infringer, by any copyright owner or copyright owner's authorized licensee, or by a service provider, who is injured by such misrepresentation, as the result of the service provider relying upon such misrepresentation in removing or disabling access to the

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such information will only be used for the purpose of protecting rights under this title.

(3) **Contents of subpoena.**—The subpoena shall authorize and order the service provider receiving the notification and the subpoena to expeditiously disclose to the copyright owner or person authorized by the copyright owner information sufficient to identify the alleged infringer of the material described in the notification to the extent such information is available to the service provider.

(4) **Basis for granting subpoena.**—If the notification filed satisfies the provisions of subsection (c)(3)(A), the proposed subpoena is in proper form, and the accompanying declaration is properly executed, the clerk shall expeditiously issue and sign the proposed subpoena and return it to the requester for delivery to the service provider.

(5) **Actions of service provider receiving subpoena.**—Upon receipt of the issued subpoena, either accompanying or subsequent to the receipt of a notification described in subsection (c)(3)(A), the service provider shall expeditiously disclose to the copyright owner or person authorized by the copyright owner the information required by the subpoena, notwithstanding any other provision of law and regardless of whether the service provider responds to the notification.

(6) **Rules applicable to subpoena.**—Unless otherwise provided by this section or by applicable rules of the court, the procedure for issuance and delivery of the subpoena, and the remedies for noncompliance with the subpoena, shall be governed to the greatest extent practicable by those provisions of the Federal Rules of Civil Procedure governing the issuance, service, and enforcement of a subpoena duces tecum.

(i) Conditions for eligibility.—

(1) **Accommodation of technology.**—The limitations on liability established by this section shall apply to a service provider only if the service provider—

(A) has adopted and reasonably implemented, and informs subscribers and account holders of the service provider's system or network of, a policy that provides for the termination in appropriate circumstances of subscribers and account holders of the service provider's system or network who are repeat infringers; and

(B) accommodates and does not interfere with standard technical measures.

(2) **Definition.**—As used in this subsection, the term "standard technical measures" means technical measures that are used by copyright owners to identify or protect copyrighted works and—

(A) have been developed pursuant to a broad consensus of copyright owners and service providers in an open, fair, voluntary, multi-industry standards process;

(B) are available to any person on reasonable and nondiscriminatory terms; and

(C) do not impose substantial costs on service providers or substantial burdens on their systems or networks.

(j) **Injunctions.**—The following rules shall apply in the case of any application for an injunction under section 502 against a service provider that is not subject to monetary remedies under this section:

(1) **Scope of relief.**—(A) With respect to conduct other than that which qualifies for the limitation on remedies set forth in subsection (a), the court may grant injunctive relief with respect to a service provider only in one or more of the following forms:

(i) An order restraining the service provider from providing access to infringing material or activity residing at a particular online site on the provider's system or network.

(ii) An order restraining the service provider from providing access to a subscriber or account holder of the service provider's system or network who is engaging in infringing activity and is identified in the order, by terminating the accounts of the subscriber or account holder that are specified in the order.

(iii) Such other injunctive relief as the court may consider necessary to prevent or restrain infringement of copyrighted material specified in the order of the court at a particular online location, if such relief is the least burdensome

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criteria in that subsection, and shall not affect a determination of whether that service provider qualifies for the limitations on liability under any other such subsection.

(Added Pub.L. 105-304, Title II, § 202(a), Oct. 28, 1998, 112 Stat. 2877.)

¹ So in original. Two sections 612 of this title have been enacted.

HISTORICAL AND STATUTORY NOTES

Effective Date

1998 Acta. Section 208 of Pub.L. 105-304, provided that: "This title and the amendments

made by this title [Pub.L. 105-304, Title II, Oct. 28, 1998, 112 Stat. 2877, which enacted this section] shall take effect on the date of the enactment of this Act [Oct. 28, 1998]."

CHAPTER 6—MANUFACTURING REQUIREMENTS AND IMPORTATION

§ 601. Manufacture, importation, and public distribution of certain copies

(a) Prior to July 1, 1986, and except as provided by subsection (b), the importation into or public distribution in the United States of copies of a work consisting preponderantly of nondramatic literary material that is in the English language and is protected under this title is prohibited unless the portions consisting of such material have been manufactured in the United States or Canada.

(b) The provisions of subsection (a) do not apply--

(1) where, on the date when importation is sought or public distribution in the United States is made, the author of any substantial part of such material is neither a national nor a domiciliary of the United States or, if such author is a national of the United States, he or she has been domiciled outside the United States for a continuous period of at least one year immediately preceding that date; in the case of a work made for hire, the exemption provided by this clause does not apply unless a substantial part of the work was prepared for an employer or other person who is not a national or domiciliary of the United States or a domestic corporation or enterprise;

(See main volume for text of (2) to (7); (c) to (a))

(As amended Pub.L. 105-80, §§ 12(a)(15), (16), Nov. 13, 1997, 111 Stat. 1535.)

HISTORICAL AND STATUTORY NOTES

Amendments

1997 Amendments. Subsec. (a). Pub.L. 105-80, § 12(a)(15), substituted "nondramatic" for "nondramtic".

Subsec. (b)(1). Pub.L. 105-80, § 12(a)(16), substituted "substantial" for "substantial".

Effective Dates

1997 Acta. Amendments by Pub.L. 105-80 effective Nov. 13, 1997, see section 13 of Pub.L. 105-80, set out as a note under section 119 of this title.

LIBRARY REFERENCES

Encyclopedias

Prohibition of importation of certain items, see C.J.S. Customs Duties § 20.
18 Am Jur 2d, Copyright and Literary Property §§ 263 et seq.

7 Fed Proc, L Ed § 18-5.
Ahrans, Law of Copyright.
Bourstyn, Copyright Law.

Texts and Treatises

Business and Commercial Litigation in Federal Courts §§ 65.2, 65.3, 65.15.

§ 602. Infringing importation of copies or phonorecords

CROSS REFERENCES

Sovereign immunity for violation of this section, see 17 USCA § 611.

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THE DISTRICT OF COLUMBIA

ALSO ADMITTED IN
FLORIDA

OF COUNSEL

AVA PAQUETTE
JEANNE M. DAVIGAN

TELECOPIER MESSAGE

DATE: 22 May 1999 TIME: _____

TO: Quickbyte Legal Dept. FAX NO: 561 740 2108

FROM: Ava Paquette

There are 11 pages to this transmission, including this page.

CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged or confidential. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you received this communication in error, please notify us immediately by telephone and return the original message to us at the address above via U.S. Postal Service. Thank you.

MOXON & KOBRIN

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THE DISTRICT OF COLUMBIA
ALSO ADMITTED IN
FLORIDA

OF COUNSEL

AVA M. PAQUETTE
JEANNE M. GAVIGAN

May 22, 1999
VIA TELEFAX
(561) 740-2108

Quickbyte
Legal Department/Abuse Department
1325 South Congress Avenue
Lakewood, Florida 33426

Re: Unauthorized Use of Copyrighted Materials

Dear Sir/Madam:

Our office represents Religious Technology Center ("RTC") and Bridge Publications, Inc. ("BPI").

RTC holds the exclusive rights under the copyrights to a certain unpublished work known as the "Class VIII Tape - Assists" work. BPI holds the exclusive rights under the copyrights to certain published works of the Scientology religion entitled "Enemy Names", "Attacks on Scientology" and "Amprinistics." These works are registered with the United States Copyright Office under registration numbers TX 2646406 and TXu 593 514, copies of which are attached.

We have obtained information that one of your subscribers, with the e-mail address "pro...1@my-dejanews.com" used your system to post the above-referenced copyrighted works to the Internet. A copy of the headers for each of these postings containing these works are also attached.

As you can see, the NNTP Posting Host listed on these headers is your server. Accordingly, your subscriber's actions in making these postings are a violation of United States copyright law.

We therefore request that you provide us the identity of the person who made these postings so that we may contact this person directly.

Quickbyte
May 22, 1999
Page 2

These copyrighted works were posted verbatim, and I have a good faith belief and in fact know, for certain, that the posting of these works by your subscriber is not authorized by my clients or any agent of my clients, or by the law.

I declare under penalty of perjury that this information is accurate and that I am authorized to act on behalf of RTC and BPI in this matter.

Would you please get back to me about this matter right away, as we would like to stop this person immediately from using your services to engage in any future such infringement.

Very truly yours,

Ava Paquette co

Ava M. Paquette

AMP/co
Attachments



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
REGISTER OF COPYRIGHTS
United States of America

REGISTRATION NUMBER

TXu 593-514



EFFECTIVE DATE OF REGISTRATION

09 07 94
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

681003 CLASS VIII LECTURE 10 CONFIDENTIAL - ASSISTS

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

NAME OF AUTHOR

L. Ron Hubbard

DATES OF BIRTH AND DEATH

Year Born 1911 Year Died 1986

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country USA
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. text

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases.
1968

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month Day Year

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.
Church of Spiritual Technology
PO Box 1182
Los Angeles, CA 90078

APPLICATION RECEIVED
ONE DEPOSIT RECEIVED
TWO DEPOSITS RECEIVED
REMITTANCE NUMBER AND DATE
DO NOT WRITE HERE OFFICE USE ONLY

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.
by assignment

OTE



Instructions are completing space

CHECKED BY

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
 - This is the first published edition of a work previously registered in unpublished form.
 - This is the first application submitted by this author as copyright claimant.
 - This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give Previous Registration Number ▼ Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

- a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼
- b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

—space deleted—

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- a Copies and Phonorecords
- b Copies Only
- c Phonorecords Only

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account Name ▼ Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/Zip ▼

Church of Spiritual Technology
PO Box 1182
Los Angeles, CA 90078

Area Code & Telephone Number ▶ (213) 466-3310

CERTIFICATION I, the undersigned, hereby certify that I am the

Check one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of Church of Spiritual Technology
Name of author or other copyright claimant or owner of exclusive right(s) ▶

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Norman Starkey

date ▶ August 23, 1994

Handwritten signature (with arrow pointing to signature)

MAIL CERTIFICATE TO

Certificate will be mailed in window envelope

Name ▼	Church of Spiritual Technology
Number/Street/Apartment Number ▼	PO Box 1182
City/State/ZIP ▼	Los Angeles, CA 90078

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 10

SEND ALL ELEMENTS IN THE SAME PACKAGE:
1 Application form
2 Non-refundable \$10 filing fee in check or money order payable to Register of Copyrights
3 Deposit material

MAIL TO:
Register of Copyrights
Library of Congress
Washington, D.C. 20540

CERTIFICATE OF COPYRIGHT REGISTRATION

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER



OFFICIAL SEAL

This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 410(a) of title 17, United States Code, attests that copyright registration has been made for the work identified below. The information in this certificate has been made a part of the Copyright Office records.

[Signature]

REGISTER OF COPYRIGHTS
United States of America

TX 2-646-306-306

EFFECTIVE DATE OF REGISTRATION
September 14, 1989

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

TITLE OF THIS WORK

HOO POLICY LETTER OF 25 FEBRUARY 1966 ATTACKS ON SCIENTOLOGY

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Year Date On Page

2

NAME OF AUTHOR

a L. Ron Hubbard

DATES OF BIRTH AND DEATH

Year Born 1911 Year Died 1986

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country USA
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymously? Yes No
Pseudonymously? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed.

Entire text

NOTE

NAME OF AUTHOR

b

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymously? Yes No
Pseudonymously? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed.

NAME OF AUTHOR

c

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymously? Yes No
Pseudonymously? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by the author in which copyright is claimed.

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1966

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

February 25 1966 USA

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

L. Ron Hubbard
6515 Sunset Blvd., Suite 202
Los Angeles, CA 90028

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED
SEP 16 1989
ONE DEPOSIT RECEIVED
TWO DEPOSITS RECEIVED
SEP 14 1989
REMITTANCE NUMBER AND DATE

MORE ON BACK

DO NOT WRITE HERE
Page 1 of 2

TX 2-646-306

EXAMINET	FORM TX
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> DEPOSIT ACCOUNT FUNDS USED	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box)
 - This is the first published edition of a work previously registered in unpublished form.
 - This is the first application submitted by this author as copyright claimant.
 - This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give Previous Registration Number Year of Registration

5

DERIVATIVE WORK OR COMPILATION Complete both spaces 6a & 6b for a derivative work; complete only 6b for a compilation.

- 6a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.
- 6b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

6

—space deleted—

7

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- Copies and Phonorecords
- Copies Only
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DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

CORRESPONDENCE Give name and address to which correspondence about this application should be sent.

Norman F. Starkey
6515 Sunset Blvd., Suite 202
Los Angeles, CA 90028

area Code & Telephone Number (213) 664-6007 ext. 730

CERTIFICATION I, the undersigned, hereby certify that I am the

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of _____

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of owner or other copyright claimant, or owner of exclusive right(s)

Typed or printed name and date If this is a published work, this date must be the same as or later than the date of publication given in space 3

Norman F. Starkey Date September 13, 1989

Handwritten signature (X) 

MAIL CERTIFICATE TO

Name	Norman F. Starkey
Home Street Address Number	6515 Sunset Blvd., Suite 202
City State ZIP	Los Angeles, CA 90028

Certificate will be mailed in window envelope

YOU MUST:

- 1. Complete all necessary blocks
- 2. Sign and date at space 10

SEND TO:

MAIL TO:

Register of Copyrights
Library of Congress
Washington, D.C. 20540

11

17 USC § 106. Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408 or in any written statement filed in connection with the application shall be fined not more than \$2,000.

Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!newshub.northeast.verio.net!news-feeds.jump.net!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail

From: ProXenu <proxenu1@my-dejanews.com>

Newsgroups: alt.religion.scientology

Subject: Bucking for that open spot with SPC ! #7

Date: Tue, 27 Apr 1999 08:49:18 GMT

Organization: Deja News - The Leader in Internet Discussion

Lines: 494

Message-ID: <7g3tme\$94s\$1@nnrp1.dejanews.com>

NNTP-Posting-Host: 209.149.14.80

X-Article-Creation-Date: Tue Apr 27 08:49:18 1999 GMT

X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)

X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80

Xref: nntp.earthlink.net alt.religion.scientology:689302

Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!netnews.com!news.maxwell.syr.edu!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that open spot with SPC ! #6
Date: Tue, 27 Apr 1999 08:44:07 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 222
Message-ID: <7g3tcm\$90h\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:44:07 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:689301

Path: nntp.earthlink.net!newsfeed1.earthlink.net!newspeer.monmouth.com!nntp2.
dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that open spot with SPC !
Date: Tue, 27 Apr 1999 08:07:17 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 263
Message-ID: <7g3r7i\$79g\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:07:17 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:690435

Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!netnews.com!news.maxwell.syr.edu!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that spot with SPC ! #6
Date: Tue, 27 Apr 1999 08:29:56 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 127
Message-ID: <7g3si0\$87r\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:29:56 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:689299

MOXON & KOBRIN

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TELECOPIER (323) 993-4436

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HELENA K. KOBRIN

OF COUNSEL

AVA PAQUETTE
JEANNE M. GAVIGAN

ALSO ADMITTED IN
THE DISTRICT OF COLUMBIA

ALSO ADMITTED IN
FLORIDA

TELECOPIER MESSAGE

Date: May 23, 1999

Time: 8:59 PM

To: Quickbyte

Fax No: (561) 40-2108

There are 9 pages to this transmission, including this page.

CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged or confidential. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you received this communication in error, please notify us immediately by telephone and return the original message to us at the address above via U.S. Postal Service. Thank you.

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LOS ANGELES, CALIFORNIA 90028-6329
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THE DISTRICT OF COLUMBIA

ALSO ADMITTED IN
FLORIDA

OF COUNSEL

AVA M. PAQUETTE
JEANNE M. GAVIGAN

May 23, 1999

VIA TELEFAX
(561) 740-2108

Quickbyte
Legal Department/Abuse Department
1325 South Congress Avenue
Lakeworth, Florida 33426

Re: Unauthorized Use of Copyright Materials by your Subscriber
Proxenu1@my-dejanews.com

Dear Webmaster:

This is a supplement to my cease and desist notice of claimed infringement sent to you yesterday regarding the above-referenced subscriber. In investigating this matter further, we have learned of additional information regarding this subscriber which requires your assistance.

As I had previously informed you, someone calling themselves "proxenu1@my-dejanews.com" posted our clients', RTC and BPI's, copyrighted works to the Internet, through Quickbyte. I have again attached these headers of these postings containing the works. (See Tab A). As you can see, the NNTP Posting Host listed on these headers is your server.

In researching this matter, our computer expert discovered that each of these postings include a PGP key. He was able to locate this PGP key on an MIT server which shows that this particular PGP key belongs to the the user name "mantas6@bigfoot.com". Thus, the simple conclusion is that "proxenu1@bigfoot.com and "mantas6@bigfoot.com"are one and the same

Quickbyte
May 23, 1999
Page 2

person. A further search was done for any postings done by "mantas6". We found only one which we have attached here at Tab B. As you can see the NNTP Posting Host, shows that the posting was made through Quickbyte. Thus, the evidence strongly suggests that "proxenu" and "mantas" are one and the same person or are working in concert to engage in using Quickbyte for copyright infringement purposes.

Accordingly, we also request that you provide us with the identity of "mantas6@bigfoot.com".

I am sure you can understand the urgency of handling this matter immediately, before this person continues in their pattern of infringement.

I appreciate your prompt attention to this matter.

Very truly yours,

Ava M. Paquette

AMP/sg
enc.

Path: nntp.earthlink.net!newsfeed1.earthlink.net!newspeer.monmouth.com!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that open spot with SPC !
Date: Tue, 27 Apr 1999 08:07:17 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 263
Message-ID: <7g3r7i\$79g\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:07:17 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:690435

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA1

Can anyone tell me if this is copyrighted by RTC or not ?

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

Gen Non- HCO EXECUTIVE LETTER OF 27 SEPTEMBER 1965
Remimeo

TO: ORG STAFFS
FROM: RON
SUBJECT: "AMPRINISTICS"

Over the past 15 years we have seen a lot of groups splinter off from Scientology and beat the drum for some off beat use of the technology. We call them "squirrels" because they are so nutty. They come and they go. We're still here and will continue to be.

A vast body of technology such as Dianetics and Scientology can give birth to a thousand "new developments" and never notice it. There are close to a half a billion words of research data in the Archives at Saint Hill, enough to start a thousand fads, any part of it.

The latest squirrels are a group headed by an ex-employee in England who was sacked for homosexuality and theft. Promptly joined by an American who was once deported for 2nd Dynamic reasons and who ran off from his wife and children to join the band, this group is having a rough time of it.

Internal dissension is what tears these splinter groups apart. Formed by people whose overt acts against Scientology prevent case

gain, they rapidly rip one another to pieces.

"Ron Howes" was an early example. Joined by undesirables from the Wichita Dianetic Foundation in 1951 they had a brief flurry and this his companions so involved Howes that he was soon in jail and today is reported as a Catholic Priest! The rest of the group dispersed, never to be heard from again.

There was once an "E-Therapy" taken from the "Throg-Magog" example in Dianetics Evolution of a Science, released by a long gone fellow Kitselman. They had people mock up a god to tell them what to do, so avoiding auditing and spun themselves in. This is the nearest thing we've had to "Amprinistics".

The keynote of such "developments" is how to avoid auditing and prevent revealing overts.

Old Joe Winter was another example. And there are many, many more. All gone now, dead or in jail or vanished.

The latest splinter is no exception. It is using Concept Therapy and Rising Scale Processing with "dichotomies" from 1951 Dianetics, fancied up and advertised as "senior Scientology"! Some day somebody will revive the engram running as done in 1950 as the "latest development". These old processes have a history of being grabbed and altered. A Chiropractic group in 1953 really "went to town" with Concept Therapy. It is quite a good process. But limited. It would be about Grade I in modern Scientology, not used because it starts out fine but dead ends. You can find the right processes for it in old books and bulletins. It could make a low level Release if expertly run on a Mark V meter but never a Clear. And to self audit it would be fatal.

We don't object to Dianetics or Scientology being used. We prefer it to have its right name. But we like to have it in clean hands. There's been too much betrayal in this universe already and for fellows whose records include homosexuality and theft to start up a fuss with 14 year old technology is a bit thick.

They are quite violent on the subject of ethics as you ordinarily expect a criminal to be and are savage about organizations, having stolen money and lists from ours. They are being careful not to attack me publicly in the hopes people will think them noble and inspired. They're inspired all right -- by the "buck". But we wish them no bad luck. We don't have to. It's punishment enough just to be themselves and live with what they are.

It's amusing how the group acts within itself. When Horner arrived in England he was supposed to be met with a big cheque so he could lecture all over the world. Of course he got no cheque. This particular auditor has run off to every splinter group that was ever formed and when they collapse, comes back head hanging, case unchanged and fortunes in rags and ruin. He's been doing it

for 15 years. A sort of Jonah! His case doesn't change by the way because no HGC auditor has ever been able to get him into an auditing chair! His dream is total gain without processing. For that he avoids all his withholds.

Soon they'll have another's throats cut or in jail and that will be that.

For a splinter group to try to start up just as Scientology is restoring all past releases and has a large number going Clear at Saint Hill is a tough break for them. We will of course have to refuse them and anyone connected with them any of the materials for Classes and Grades V, VI, VII and VIII in order to prevent their use against people by suppressives. This effectively the way to their personal progress as policy on them states that regardless of amnesty or amends they may never again be trained. And the chances of such finding their own way are zero. A rather bad fate for the sake of a few quick "bucks" or pounds. For we could never trust them again with preclear's cases.

If you meet anyone going off to this group, list them with your Ethics Officer. They will never be given any upper level materials or training.

We don't really wish them any harm. We only hope they don't hurt too many when they crash.

Then I suppose we'll have to pick up the pieces.

We've been doing it for 15 years.

"O Man thou art a foolish beast. The way thou runnest about after gew-gaws, no wonder it took so long for somebody to find the way."

DATA

Amprinistics - Culled from 1951 Dianetics "dichotomies" pretends to be a "Senior Scientology". In actual fact it is a low level self-audit calculated to spin people in with end words. As a suppressive action it seeks to make a virtue out of not being audited thus barring the road. It was probably dreamed up by Horner, not Harry Thompson.

Harry Thompson - At the bottom of the "Death lessons" press scandal was Harry Thompson. He has several wives and many children and is sought by the police for abandonment. He has attacked HCO secretaries. He pretended to the press to be an "American Doctor". He has no certificates or training. He is the subject of an Ethics Order as a Suppressive Person.

Edgar Watson - Was an early subject of Ethics. When investigated for no case gain it turned out he had used a job at Saint Hill to embezzle money and used auditing to obtain subjects to satisfy homosexual appetites. He was quietly dismissed to save us the embarrassment of his being arrested for both crimes but was severely warned. He is a barber by profession, is poorly educated, has a permanent leg injury which does not heal. He is the subject of numerous preclear complaints about his squirrel auditing and the HCO Sec London traced all UK enturbulation to his group in 1963. He owes us a large amount of money.

Jack Horner - This ex-auditor has been a runaway to every splinter group ever formed. When they crash he comes back and begs forgiveness. He is heavily suppressive of pcs and has used any confidential data that came his way illegally. he has been the subject of a Comm Ev for

abuse of materials and when saved by an amnesty promptly committed other offenses. He is violent on the subject of being audited and refused free processing in to HGCs. He has been psychotic on the subject of organizations and has done everything possible to to tear them down. He has used auditing to turn pcs against orgs and in his connections with "Amprinistics" is merely furthering his own hate lines of auditing and organizations. In 1960 he was instrumental in ruining the life of Nibs Hubbard, with the help of Nina West by setting the boy against an organization and then getting him arrested in the Middle West. Smooth and glib, many people have been deluded into helping him. To him can be traced lies about much private auditors should make, luring auditors from orgs and giving them loses when they don't reap fortunes. He has deserted several women, leaving them with children and was the subject of deportation from England for violating a girl who was ward of a court. He owes the organization money.

Forecast - The group will grab any money in sight and skip after doing orgs as much damage as possible and in a few months will never be heard from again, following the course of all such groups.

TREATMENT - They are each fair game, can be sued or harassed. Horner can be barred out of any Commonwealth Country or England as he was the subject of a deportation order from England and his file has come alive again in the Home Secretary's Office. Harry Thompson's wives and victims are always looking for him to have him arrested. Watson is set-up for arrest as a homosexual. Any meeting held by them should be torn up. The names of any persons attending should be collected and they should be labelled as SP as they have left Scientology. These people are Sp because they are seeking to avoiding auditing and retain their withholds. Once labelled, these persons will not then be covered by amnesty and will never be admitted to further training or processing. Persons messing themselves up with Amprinistics self audit and restim should be refused any assistance. If these person move into your area act through any agency you can to have them deported or arrested on whatever grounds. England is currently too hot for them so

they may tour about. Horner's UK deportation order, Thompson's police record and Watson's homosexuality have made them very vulnerable to deportation.

They do not have our mailing lists but have contacted only people whose addresses appeared in the last years to auditors. By holding meetings in the vicinity of each Scientology organization they hope to recruit applicants.

Their influence is far less than they pretend. They seem big (like any SP) because they sent literature to our org officers in an effort to suppress them. Their public reach is very tiny. Don't help it. Therefore this is our policy:

- (1) Do not mention the name Amprinistics in public or in our magazines or issues.
- (2) Harass these person in any possible way.
- (3) label publicly "ideas which preach no-auditing as simply Suppressive Actions to deny people case gains"
- (4) Tear up any meeting held and get the names of those attending and issue SP orders on them and you'll have lost a lot of rats.
- (5) Promote like mad and get the new Foundation Course and Grades of Release in so you'll be on firm ground if they upset your area.

They may bring temporary enturbulation to your area but beyond that have no other importance as such groups die easily and we make a habit of survival.

LRH:ml

L. Ron Hubbard

--
Thanks !

ProXenu

"To improve on L. Ron Hubbard, if Scientology is communicating, be in doubt." - (c) Gerry Armstrong

-----BEGIN PGP SIGNATURE-----

Version: PGPfreeware 5.5.3i for non-commercial use <<http://www.pgpi.com>>

iQA/AwUBNyVvV/dCqoNocDX7EQJVtwCg51A3aYPash9hyX6J7/BAR/GJcacAoLvc
FVOG/3opa8MCAzZPKOHeh2yD

=makA

-----END PGP SIGNATURE-----

-----= Posted via Deja News, The Discussion Network =-----
<http://www.dejanews.com/> Search, Read, Discuss, or Start Your Own

From: Mantas6@bigfoot.com (Al)
Subject: Importing a vehicle
Date: 05 May 1999 00:00:00 GMT
Message-ID: <hC8Y2.3138\$4S.2040226@WReNphoon3>
X-Trace: WReNphoon3 925963789 10.0.3.176 (Wed, 05 May 1999 21:09:49 PDT)
Organization: <http://www.remarq.com>: The World's Usenet/Discussions Start Here
X-Originating-Host: 209.149.14.65
NNTP-Posting-Date: Wed, 05 May 1999 21:09:49 PDT
Newsgroups: soc.culture.costa-rica

I am vacationing in Costa Rica later this month and I was wondering if anyone reading this has successfully imported a personal vehicle to Costa Rica from the US and what steps you took...
Thank you !

**** Posted from RemarQ - <http://www.remarq.com> - Discussions Start Here (tm) ****

From: Mantas6@bigfoot.com (Al)
Subject: Importing a vehicle
Date: 05 May 1999 00:00:00 GMT
Message-ID: <hC8Y2.3138\$4S.2040226@WRenphoon3>
X-Trace: WRenphoon3 925963789 10.0.3.176 (Wed, 05 May 1999 21:09:49 PDT)
Organization: <http://www.remarq.com>: The World's Usenet/Discussions Start Here
X-Originating-Host: 209.149.14.65
NNTP-Posting-Date: Wed, 05 May 1999 21:09:49 PDT
Newsgroups: soc.culture.costa-rica

I am vacationing in Costa Rica later this month and I was wondering if anyone reading this has successfully imported a personal vehicle to Costa Rica from the US and what steps you took...
Thank you !

**** Posted from RemarQ - <http://www.remarq.com> - Discussions Start Here (tm) ****

(Relief request, i.e., State what you want the Court to do or award)

Wherefore, THE ATTACHED SUBPOENA IS ISSUED
BY THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA IN
ACCORDANCE WITH 17 U.S.C. § 512 (h).

Signed this: 24 day of MAY, 19 99.

(Signature of plaintiff)
(Address)
(Phone Number)
(Facsimile Number)
(Florida Bar Number)

ROSANA E. HERNANDEZ ESQ
ZUCKERMAN, SPAEDER, TAYLOR,
& EVANS, L.L.P.
201 SOUTH BISCAYNE BOULEVARD
SUITE 900
MIAMI, FLORIDA 33131
phone (305) 579-9749
fax (305) 579-0110
FL BAR # 0155713

EXHIBIT A

Copies of 4 unpublished, copyrighted works known as HCO Executive Letter of 27 September 1965 "Amprinistics," HCOPL 16 February 1969 "Enemy Names," HCOPL 25 February 1966 "Attacks on Scientology" and 681003 Class VIII Lecture 10 Confidential - "Assists," some of which are registered with the United States Copyright Office under registration numbers: TX 264 306 and TXu 593 514, which were posted on April 27, 1999 from the DejaNews account, "Proxenu1@my-dejanews.com," under the attached headers.

Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!newshub.northeast.verio.net!news-feeds.jump.net!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail

From: ProXenu <proxenu1@my-dejanews.com>

Newsgroups: alt.religion.scientology

Subject: Bucking for that open spot with SPC ! #7

Date: Tue, 27 Apr 1999 08:49:18 GMT

Organization: Deja News - The Leader in Internet Discussion

Lines: 494

Message-ID: <7g3tme\$94s\$1@nnrp1.dejanews.com>

NNTP-Posting-Host: 209.149.14.80

X-Article-Creation-Date: Tue Apr 27 08:49:18 1999 GMT

X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)

X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80

Xref: nntp.earthlink.net alt.religion.scientology:689302

Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!netnews.com!news.maxwell.syr.edu!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that open spot with SPC ! #6
Date: Tue, 27 Apr 1999 08:44:07 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 222
Message-ID: <7g3tcm\$90h\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:44:07 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x0.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:689301

United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

IN THE MATTER OF THE APPLICATION OF
RELIGIOUS TECHNOLOGY CENTER AND BRIDGE
PUBLICATIONS, INC. FOR A SUBPOENA
TO IDENTIFY INFRINGER PURSUANT TO
17 U.S.C. SECTION 512(h)

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 99-8388-CV-

TO: Legal Department
QuickByte Inc.
1325 South Congress Avenue
Lake Worth, Florida 33426

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

YOU ARE COMMANDED, pursuant to 17 U.S.C. Section 512(h), to expeditiously disclose to Religious Technology Center and Bridge Publications, Inc., by and through its attorneys, Zuckerman, Spaeder, Taylor & Evans LLP, on or before the date set forth herein, information sufficient to identify the alleged infringer of the works described in Exhibits A and B attached here to the extent such information is available to you.

PLACE

Zuckerman, Spaeder, Taylor & Evans LLP
201 South Biscayne Blvd.
Miami, Florida 33131

DATE AND TIME

May 25, 1999
10:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

CARLOS HUENKE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

5/24/99

ISSUING OFFICER'S NAME ADDRESS AND PHONE NUMBER

By: *[Signature]*
Deputy Clerk

Path: nntp.earthlink.net!newsfeed1.earthlink.net!newspeer.monmouth.com!nntp2.
dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that open spot with SPC !
Date: Tue, 27 Apr 1999 08:07:17 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 263
Message-ID: <7g3r7i\$79g\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:07:17 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1-22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:690435

FROM
Path: nntp.earthlink.net!newsfeed1.earthlink.net!news.idt.net!netnews.com!news.maxwell.syr.edu!nntp2.dejanews.com!nnrp1.dejanews.com!not-for-mail
From: ProXenu <proxenu1@my-dejanews.com>
Newsgroups: alt.religion.scientology
Subject: Bucking for that spot with SPC ! #6
Date: Tue, 27 Apr 1999 08:29:56 GMT
Organization: Deja News - The Leader in Internet Discussion
Lines: 127
Message-ID: <7g3si0\$87r\$1@nnrp1.dejanews.com>
NNTP-Posting-Host: 209.149.14.80
X-Article-Creation-Date: Tue Apr 27 08:29:56 1999 GMT
X-Http-User-Agent: Mozilla/4.0 (compatible; MSIE 5.0; Windows 98)
X-Http-Proxy: 1.1 x9.dejanews.com:80 (Squid/1.1.22) for client 209.149.14.80
Xref: nntp.earthlink.net alt.religion.scientology:689299

EXHIBIT B

From: Mantas6@bigfoot.com (Al)
Subject: Importing a vehicle
Date: 05 May 1999 00:00:00 GMT
Message-ID: <hC8Y2.3138\$4S.2040226@WRenphoon3>
X-Trace: WRenphoon3 925963789 10.0.3.176 (Wed, 05 May 1999 21:09:49 PDT)
Organization: <http://www.remarq.com>: The World's Usenet/Discussions Start Here
X-Originating-Host: 209.149.14.65
NNTP-Posting-Date: Wed, 05 May 1999 21:09:49 PDT
Newsgroups: soc.culture.costa-rica

I am vacationing in Costa Rica later this month and I was wondering if anyone reading this has successfully imported a personal vehicle to Costa Rica from the US and what steps you took...
Thank you !

**** Posted from RemarQ - <http://www.remarq.com> - Discussions Start Here (tm) ****

AO 88 (11/91) Subpoena in a Civil Case

PROOF OF SERVICE

SERVED	DATE	PLACE
	SERVED ON (PRINT NAME)	
SERVED BY (PRINT NAME)		MANNER OF SERVICE
		TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in per-

son, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.