## IN THE CIRCUIT COURT FOR THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA CIVIL DIVISION

ESTATE OF LISA MCPHERSON, by and through the personal Representative, DELL LIEBREICH,

Plaintiff,

Case No. 00-5682-CI-11 Division 11

VS.

CHURCH OF SCIENTOLOGY FLAG SERVICE ORGANIZATION, JANIS JOHNSON, ALAIN KARTUZINSKI and DAVID HOUGHTON, D.D.S.,

Defendants.

AND RELATED COUNTERCLAIM.

STATE OF OKLAHOMA )

COUNTY OF PITTSBURG )



## AFFIDAVIT OF GARY W. SMITH

GARY W. SMITH, being duly sworn, depose and says:

1. I am a parishioner of the Church of Scientology Flag Service Organization.

Since May 1989, I have been the Executive Director of the principal Narconon drug and rehabilitation program, located initially in Kay County, Oklahoma, and relocated to Arrowhead State Park in Pittsburg County, Oklahoma in July, 2001.

2. Narconon (meaning "non-narcosis" or "no drugs") is a drug-free withdrawal, detoxification and rehabilitation program that utilizes technologies developed by L. Ron Hubbard to cure drug and alcohol addictions in society at-large. The Narconon program is delivered at a state of the art facility located on 257 acres within Arrowhead State Park, and at approximately 100 other Narconon centers worldwide. Narconon has received many recognitions from government authorities, both in the United States and internationally, for its extraordinarily high success rate.

The Narconon Arrowhead property and facilities were funded entirely by

Scientologists and a significant portion of those donations came from parishioners of

Church of Scientology Flag Service Organization.

- 3. Devoting my life to forward the aims of Narconon and making a difference in the war against drugs on this planet comes from my application of the principle of the optimum solution: taking those actions which do the greatest good for the greatest number of dynamics.
- 4. Attached to this Affidavit is a 22 minute video tape that provides an overview of the Narconon program. This tape includes a segment on the origin and development of Narconon based upon Mr. Hubbard's research and writings, as well as its current application at the Arrowhead campus. The tape also includes interviews of leading international (United States, Canada, United Kingdom and India) authorities in the field

of drug rehabilitation, speaking of the vital role of Narconon in combating drug addiction.

Geylus J. Gary W. Smith

STATE OF OKLAHOMA

**COUNTY OF PITTSBURG** 

The foregoing instrument was sworn to and subscribed before me this 16 day of July 2002, by Gary W. Smith, who produced identification /is personally known to me.

COMM EXP 01-18-2008 PITISBURG COUNTY

**NOTARY PUBLIC**