

EXHIBIT 1

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

The Founding Church of Scientology)
of Washington, D.C.)
1812 19th Street, N.W.)
Washington, D.C. 20009)

Plaintiff)

vs.)

CA 12-174
Civil Action No. _____

HEINRICH BAUER VERLAG)
2 Hamburg 11)
Katherinstr. 7-9)
West Germany)

Horst Herold)
Bundeskriminalant)
62 Weisbaden)
Thoersta 11)
West Germany)

Fred König)
2 Hamburg 11)
Ost-West Strasse 57)
West Germany)

Horst Ebert)
2 Hamburg 11)
Ost-West Strasse 57)
West Germany)

German Language Publications)
75 Varick Street)
New York, New York 10013)

Defendants)

COMPLAINT FOR LIBEL

1. The jurisdiction of this Court is based upon D.C. Code Title 11, Chapter 9, Section 11-921; and also upon D.C. Code Title 13, Chapter 4, Section 13-423.

2. Plaintiff is and was at all times mentioned herein, a religious organization, duly organized and incorporated under the Non-Profit Corporation Act of the District of Columbia, existing under and by virtue of the laws of the District of Columbia.

3. Plaintiff is engaged in the active exercise, practice, and proselitization of the religion of Scientology in the District of Columbia.



line 1 says:
4. Defendant
Heinrich
Bauer
Verlag is
was at
all times

4. Defendant Heinrich Bauer Verlag is and was at all times mentioned herein, a publishing house and business concern organized under the laws of the sovereign state of West Germany, with its principal offices and place of business at Katherinster 7-9, 2 Hamburg 11, West Germany, and owns and publishes a magazine known as NEUE REVUE, which is and was at all times mentioned herein published at least monthly, on a regular basis, and distributed in the District of Columbia.

5. Defendant Horst Herold is, and was at all times mentioned herein, an official of the German police and a citizen of West Germany, who did act with the other defendants named herein in the preparation of the publication complained of herein.

6. Defendant Fred König is, and was at all times mentioned herein, a writer and citizen of West Germany, whose name appears in the publication complained of herein as the author of the article complained of herein.

7. Defendant Horst Ebert is, and was at all times mentioned herein, the 'Chefredakteur' or Editor-in-Chief of the publication NEUE REVUE and a citizen of West Germany.

8. Defendant German Language Publications is, and was at all times mentioned herein, a corporation incorporated under the laws of the State of New York, with its principal offices and place of business at 75 Varick Street in the City of New York in the State of New York, and is the distributor of the publication NEUE REVUE in the District of Columbia.

9. At all times mentioned herein, defendants Fred König, Horst Ebert, and German Language Publications were the agents, servants, or employees of defendant Heinrich Bauer Verlag, and were acting in such capacity as agents, servants, or employees, within the scope of their agency or employment.

10. Defendants were at all times mentioned herein, and continue to be, engaged in doing business within the District of Columbia, and did publish and distribute the magazine NEUE REVUE in the District of Columbia.

11. In the publication of NEWS WEEK magazine, Number 37, dated July, 1973, published in the District of Columbia by the defendants, and purchased and read therein by the plaintiffs on August 23 and 24, 1973, the defendants did, without privilege to do so, and through evil motive and malice; wilfully, wrongfully, and with intent and desire to injure, disgrace, and defame; and with wanton, reckless, and utter disregard for plaintiff's good name; and with wanton, reckless, and utter disregard for the truth or falsity of the statements therein concerning the plaintiff; and with actual malice, cause to be published of and concerning plaintiff the libelous and defamatory article attached hereto in haec verba as EXHIBIT A, together with a translation from the German into English, attached hereto as EXHIBIT B, which are incorporated herein by this reference.

12. The defamatory material referred to in paragraph 11 of this Complaint for Libel, and contained herewith in EXHIBITS A and B, communicated as aforesaid, did, and was calculated to, cause great injury to plaintiff's reputation, and was for the purpose of exposing plaintiff to public hatred, contempt, ridicule, obloquy, and did cause plaintiff to be shunned and avoided, and was also intended to injure plaintiff and hinder the free exercise of plaintiff's religious practices and cause great damage to efforts of and by the plaintiff to proselytize the religion of Scientology in the District of Columbia, the United States of America, and throughout the world.

13. Said libelous and defamatory article has been, and does continue to be, read by persons in the District of Columbia, the surrounding area served by the Founding Church of Scientology of Washington, D.C., and by other persons throughout the United States and the world. The defendants, and each of them, by writing and publishing said defamatory material, intended to be understood by readers and the general public, and it was so understood by them, charges and assertions that plaintiff was and is not involved in a religious movement, but rather that plaintiff was undertaking some form of unlawful and unethical activity, and further that

plaintiff employs unlawful methods in furthering its policy, that no matter what the religious doctrines and practices of the plaintiff are, that they are evil and have only bad effects.

14. Plaintiff at all times mentioned herein prior to the writing and publication of said defamatory articles in NEWS WEEK enjoyed a good reputation and good name as a religious organization.

15. At all times herein mentioned, plaintiff has been a non-profit religious organization depending upon contributions and donations from members, prospective members, and the general public for its financial support. As a direct and proximate result of the aforementioned defamatory publication, plaintiff has suffered the pecuniary loss of such support in substantial and continuing amount.

16. Plaintiff has suffered general damages in the amount of five hundred thousand dollars (\$500,000.00).

17. Plaintiff, by virtue of the actual malice and wanton, utter, and reckless disregard for the truth or falsity of the libelous material complained of herein, is entitled to exemplary and punitive damages in the amount of one million dollars (\$1,000,000.00).

WHEREUPON, plaintiff prays for judgment in this Court against defendants for five hundred thousand dollars (\$500,000.00) as general damages, one million dollars (\$1,000,000.00) as exemplary and punitive damages, costs of this action, and for any and all other relief as this Court shall deem proper.

Dated September 4, 1973
in Washington, D.C.

David A. Splitt
Attorney for Plaintiff

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EXHIBIT A

(Article published in NEUE REVUE in haec verba)

(TITLE OF ARTICLE)

"DIE MIESEN GESCHÄFTE DER FALSCHEN CHRISTEN"

(SUB-TITLE OF ARTICLE)

SIE SPRECHEN MIT SCHÖNEN WORTEN VON SEELE UND GEIST,
ABER IN WIRKLICHKEIT PLÜNDERN SIE NUR DIE BRIEFTASCHEN
IHRER GUTGLÄUBIGEN OPFER. AUCH IN DEUTCHLAND
KASSIEREN SIE MILLIONEN. SELBST VOR TERROR
SCHRECKEN SIE NICHT ZURÜCK.

(TEXT OF ARTICLE)

Die Morddrohung kam mitten in der Nacht.
Telefonisch drohte ein Mann: "Morgen werden
Sie umgebracht!"

Zuerst glaubte die 25jährige Constanze Elsner aus München
an einen schlechten Scherz. Doch die Terror-Anrufe
häuften sich. Nacht für Nacht erhielt Constanze Elsner
unzählige Morddrohungen.

Die blonde Münchnerin: "Tagelang traute
ich mich nicht mehr aus dem Haus. Ich war
kurz vor einem Nervenzusammenbruch."

Schließlich ermittelte die Post durch eine
Fangschaltung die Telefon-Nummer des nächtlichen
Anrufers. Es war die Nummer 53 12 71.

Eine Telefonnummer, die Constanze Elsner nur zu gut
kannte. Der Anschluß gehörte Hermann Brendel,
einem leitenden Funktionär der sogenannten
"Scientology-Kirche". Über diese abenteuerliche
Sekte hatte Constanze Elsner belastendes Material
gesammelt. Deshalb wurde sie terrorisiert!

Noch schlimmer erging es der Münchner Sekretärin
Hildegarde Sch. (21), die behauptet: "Sie hielten
mich fest und verhörten mich stundenlang. Ich durfte
nicht einmal zur Toilette gehen."

Hildegarde Sch. hatte nach kurzer Zeit das miese Spiel
dieser Sekte durchschaut und war wieder aus der
Organisation ausgetreten. Erst ihr Freund konnte sie
aus dem Münchener Sekten-Hauptquartier befreien.
Die Amerikanerin Lee Moate (23) gab sogar zu Protokoll:
"Ich wurde zehn Tage regelrecht gefangengehalten." Auf
einem Schiff im Kopenhagener Hafen. "Es war wie in
einem Konzentrations-Lager."

(TEXT OF ARTICLE....CONTINUED)

"Scientology", eine sinnlose Abwandlung des englischen Wortes für Wissen, hat mit echtem Christentum überhaupt nichts zu tun. Ganz im Gegenteil. In vielen Ländern ermittelt die Polizei gegen diesen Verein.

Ein Verein, der gewissenlos mit der Dummheit und der Angst der Menschen Millionen-Geschäfte macht. Gründer ist der Amerikaner Ron Hubbard (62), der nach Vermutungen, von Scotland Yard jede Woche mindestens 75 000 Mark von seinen Anhängern steuerfrei kassiert.

Dafür bietet er einmalige "religiöse" Erkenntnisse wie diese an: "Auch Tomaten haben ein Seelenleben."

Ein Mann, der ernsthaft behauptet, am 9. Mai zu einem Besuch im Himmel gewesen zu sein!

Hubbard:

"Vom Eingang aus auf der linken Seite steht ein Schild mit der Aufschrift 'Hier ist der Himmel', auf der rechten eins mit der Aufschrift 'Hölle'."

Unnachsichtig verfolgen die falschen Christen jeden, der ihre miesen Geschäfte mit einer angeblichen Religion stört.

Die englischen Behörden:

"Es ist bekannt, daß sich einige Mitglieder der Organisation mit anderen zusammengetan haben haben, um unschuldige Leute in kriminelle Angelegenheiten zu verwickeln."

Auch das Bundeskriminalamt in Wiesbaden befaßt sich bereits mit den Geschäftspraktiken der "Scientology".

Denn die Anhänger der Sekte werden ausgenommen wie Weihnachtsgänse. Die Kurse, die jeder "Gläubige" besuchen muß, kosten ihn alles in allem runde 15 000 Mark. Viele Sekten-Mitglieder büßten sogar ihr ganzes Vermögen ein.

Und täglich finden die falschen Christen neue Opfer in der Bundesrepublik. Menschen, die den Anforderungen des Lebens nicht gewachsen sind. Denn nur labile Menschen lassen sich den Unsinn einreden, daß sie mit Hilfe eines sogenannten Widerstandsmessers ihre Persönlichkeit entwickeln konnten.

Jeder neue Anhänger der Sekte muß sich dieses Gerät, das auch als Beichthilfe bezeichnet wird, für 550 Mark kaufen, das in der Herstellung ein paar Mark kostet.

Der evangelische Pfarrer Friedrich Wilhelm Haack, Beauftragter für Sektenfragen:
"Scientology ist keine Kirche, sondern die Erfindung eines gerissenen Geschäftsmannes, der damit Millionen verdient."

(TEXT OF ARTICLE....CONTINUED)

Der Pfarrer weiter:
"Im Fall dieser Sekte kann ich nur eines:
warnen und beten. Beten für die, die schon in
die Fänge dieser 'Kirche' geraten sind."

Der Däne Jakob Anderson hat ebenfalls die
Machenschaften dieser Sekte aufgedeckt,
deshalb sollte auch er mundtot gemacht werden.
In anonymen Anzeigen wurde er des Rauschgifthandels
beschuldigt. Die Polizei aber fand schnell seine
Unschuld heraus.

Außerdem wurde er verklagt. Ebenfalls ohne Erfolg,
er gewann jetzt den Prozeß in Kopenhagen.

In der Verhandlung sagte ein Arzt aus, er habe
sogar schriftliche Beweise über Erpressungsversuche
der Sekte.

Die Fragen, die jeder Neuling in der Sekte wahrheitsgemäß
beantworten muß, bieten die Grundlage für mögliche
Erpressungsversuche. Es sind Fragen wie diese:
"Sind Sie vorbestraft? Haben sie Eheschwierigkeiten?
Haben Sie eine Handlung begangen, für die Sie belangt
werden können?"

Niemand kann bei dieser Sekte sicher sein, daß solche
vertraulichen Angaben nicht später dazu benutzt werden,
um die Mitglieder unter Druck zu setzen.

Deshalb hatte schon vor Jahren Interpol London die
deutsche Kriminalpolizei offiziell informiert:
"Die Tätigkeit dieser Organisation besteht aus einer
psychologischen Amateur-Analyse des Menschen, was als
eine Art Gehirnwäsche bezeichnet werden kann."

Sektengründer Hubbard, der auf seiner Luxusjacht die
Weltmeere kreuzt, kümmert das kaum. Seine frühere
Ehefrau, die sich vor Jahren scheiden ließ:
"Er ist hoffnungslos geisteskrank."

Ein Bericht von Fred König

(CAPTION OF PHOTOGRAPH #1)

Sektengründer Ron Hubbard prüft hier mit dem
Voltmeter eine Tomate. Er behauptet: "Auch Tomaten
haben ein Seelenleben."

(CAPTION OF PHOTOGRAPH #2)

Junge Sekten-Funktionäre in einer Prozeßpause vorm
Gericht in Kopenhagen. Fanatisch verfolgen sie jeden
Kritiker. Aber den Prozeß verloren sie.

(CAPTION OF PHOTOGRAPH #3)

Der bärtige Jakob Anderson war von der Sekte verklagt worden.
Constanze Elsner sagte für ihn als Zeugin aus (Foto).
Er gewann das Verfahren.

EXHIBIT A Page Four

(CAPTION OF PHOTOGRAPH #4)

Sekten-Kritikerin, Constanze Elsner vor dem Schiff der Sekte in Kopenhagen. Sie sollte mit Morddrohungen zum Schweigen gebracht werden..

(CAPTION OF PHOTOGRAPH #5)

Funktionär Hermann Brendel. Von seinem Telefon aus wurden nachts Kritiker der Sekte mehrmals mit Mord bedroht.

(CAPTION OF PHOTOGRAPH #6)

Die Sekretärin Hildegard Sch. klagt die Sekte an: "Als ich austreten wollte haben sie mich stundenlang verhört."

(CAPTION OF PHOTOGRAPH #7)

Diese junge Amerikanerin versichert: "Die Sekte hat mich wie in einem Konzentrationslager gefangengehalten."

EXHIBIT B

(Translation of the German text of Exhibit A)

(TITLE OF ARTICLE)

"THE WRETCHED BUSINESS DEALINGS OF THE FALSE CHRISTIANS"

(SUB-TITLE OF ARTICLE)

THEY SPEAK WITH FINE WORDS ABOUT SOUL AND SPIRIT, BUT IN REALITY THEY ONLY PLUNDER THE WALLETS OF THEIR CREDULOUS VICTIMS. EVEN IN GERMANY THEY RAKE IN MILLIONS OF DEUTCHMARKS. THEY DO NOT EVEN SHRINK FROM USING TERRORISM.

(TEXT OF ARTICLE)

The murder threats came in the middle of the night. Over the telephone a man threatened: "Tomorrow you will be killed!"

At first, the 25-year old Constanze Elsner from Munich thought it was a bad joke. However, the terror phone calls heaped up. Night by night Constanze Elsner received countless murder threats.

The blond girl from Munich, Constanze Elsner, said: "For days I did not dare to go out of the house any more. I was on the verge of a nervous breakdown."

Finally, the Post Office ascertained the telephone number of the night phone caller, by means of an interception device. It was number 53 1271.

A telephone number that Constanze Elsner knew only too well. The phone connection belonged to Herman Brendel, a leading official of the so-called 'Church of Scientology'. Constanze Elsner had collected masses of material about this adventurous cult. It was on account of that that she was terrorized!

The Munich secretary Hildegard Sch. (aged 21) fared still worse. She maintains: "They held me imprisoned and interrogated me for hours on end. I was not even allowed to go to the toilet."

Hildegard Sch. had seen through the wretched game of this cult after a short time and had left the organization again. Only her boyfriend could liberate her from the headquarters of the cult in Munich. The American woman Lee Moate (aged 23) even gave the following report in evidence: "I was held completely captive for ten days. On a ship in Copenhagen harbour." The young woman continued, "It was like being held in a concentration camp."

"Scientology", a meaningless variation of the English word for knowledge, has nothing at all to do with orthodox Christianity. Quite the contrary. In many countries the police have investigated this association.

An association that unscrupulously makes a fortune out of the stupidity and fear of human beings. The founder is the American Ron Hubbard (aged 62) who, according to the suppositions of Scotland Yard, each week rakes in at least 75,000 marks tax-free from his adherents.

In return for that, he offers unique 'religious' realizations like this: "Even tomatoes have a spiritual life."

A man who seriously maintains that he went on a visit to heaven on the 9th of May!

Hubbard states:

"At the entrance there stands on the left hand side a notice board with the inscription "Here is Heaven," and on the right one with the inscription "Here is Hell".

The false Christians relentlessly prosecute everyone who upsets their wretched business with its alleged religion.

The English authorities state:

"It is known that some members of the organization united with others, to involve innocent people in criminal activities."

The Federal Criminal Affairs Bureau in Weisbaden, also is occupied with the commercial machinations of "Scientology".

For the adherents of the sect are drawn, like Christmas geese and fleeced. The courses, that each believer must take, cost them all in all around 15,000 Marks. Many members of the sect lose their entire fortune.

And each day the phony Christians find new victims in the Federal Republic. People, who are no match for the demands of life. For only unstable people let themselves be talked into the nonsense that they could develop their personalities with the help of a so-called ohm-meter.

Each new adherent of the sect must buy this instrument, which is also termed a confessional aid, for 550 Marks - this instrument, that costs a couple of Marks to manufacture.

The Lutheran parson Friedrich Wilhelm Haack, Commissioner for Sectarian Affairs, says:

"Scientology is not a Church at all, but the invention of a wily businessman, who earns millions with it."

EXHIBIT B Page Three

(TEXT OF ARTICLE.....CONTINUED)

The parson continues:
"In the case of this cult I can only do one thing:
warn and pray. Pray for those who have already
fallen into the clutches of this 'Church'."

The Danish Jakob Anderson has likewise exposed
the machinations of this cult. For that reason
he too was supposed to be reduced to silence.
In anonymous reports he was accused of drug trafficking.
But the police quickly found out he was innocent.

In addition, he was sued. Likewise without success.
He has won the lawsuit in Copenhagen.

In the trial a doctor stated in evidence that he
even had written proof of the blackmail attempts
of the sect.

The questions that each novice in the sect must
truthfully answer, offer the opportunity for
possible blackmail attempts. There are questions
like: "Have you got a criminal record? Have you
got marital problems? Have you committed an act
for which you could be prosecuted?"

No one can be sure with this sect, that such
confidential declarations cannot later be used
to put pressure on the members.

For that reason, Interpol London had already officially
informed the Criminal Police of Germany years ago
that: "The activity of this organization consists of
an amateur psycho-analysis of people, which can be
termed a kind of brainwashing."

The founder of the cult, Hubbard, who is cruising
the ocean on his luxury yacht, is hardly worried
about that. His former wife, who got divorced years
ago, says:
"He is hopelessly insane."

A report from Fred Konig

(CAPTION OF PHOTOGRAPH #1)

Cult founder, Ron Hubbard, is shown here examining a
tomato with a voltmeter. He asserts: "Even tomatoes
have a spiritual existence."

(CAPTION OF PHOTOGRAPH #2)

Young officials of the sect in a break in the legal
proceedings, in front of the Court of Justice in
Copenhagen. They fanatically prosecute every critic.
But they lost the law suit.

(CAPTION OF PHOTOGRAPH #3)

Bearded Jakob Andersen was sued by the sect. Constanze
Elsner gave evidence for him as a witness (Photo below
left). He won the proceedings.

EXHIBIT B FOUR

(CAPTION OF PHOTOGRAPH #4)

Constanze Elsner, a critic of the sect, in front of the sect's ship in Copenhagen. It was intended that she be silenced by murder threats.

(CAPTION OF PHOTOGRAPH #5)

Hermann Brendel, official of the sect. It was from his telephone that critics of the sect were repeatedly threatened, by night, with murder.

(CAPTION OF PHOTOGRAPH #6)

Hildegarde Sch., secretary, accuses the sect: "When I wanted to leave, they interrogated me for hours on end."

(CAPTION OF PHOTOGRAPH #7)

This young American girl assures us: "The sect held me captive like a prisoner in a concentration camp."