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LEAH REMINI,

Plaintiff,

VS.

DAVID MISCAVIGE; CHURCH OF
SCIENTOLOGY INTERNATIONAL, INC.; and
RELIGIOUS TECHNOLOGY CENTER, INC.,

Defendants.

CAPTION CONTINUED ON NEXT PAGE

Case No.:

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

1. CIVIL HARASSMENT
2. STALKING CALIFORNIA
CODE § 1708.7
3. INTENTIONAL INFLICTION
OF EMOTIONAL DISTRESS
4. TORTIOUS INTERFERENCE
WITH CONTRACTUAL
RELATIONSHIP
5. INTENTIONAL
INTERFERENCE WITH
PROSPECTIVE ECONOMIC
ADVANTAGE
6. DEFAMATION AND
DEFAMATION PER SE
7. DEFAMATION BY
IMPLICATION
8. FALSE LIGHT
9. DECLARATORY JUDGMENT -
CALIFORNIA CODE CIVIL
PROCEDURE § 1060

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Deadline

1 Plaintiff, LEAH REMINI, complaining of the Defendants, DAVID MISCAVIGE;
2 CHURCH OF SCIENTOLOGY INTERNATIONAL, INC.; and RELIGIOUS TECHNOLOGY
3 CENTER, INC.; herein by her attorneys, respectfully sets forth and alleges as follows:

4 **I. NATURE OF THE ACTION**

5 1. Beginning in the mid-1960s, the Church of Scientology (“Scientology”), through
6 its founder and leader, L. Ron Hubbard, institutionalized a series of retaliatory activities to be
7 taken against any individual, organization, business, or government that Scientology deems to be
8 an enemy, or Suppressive Person. Reflected in hundreds of published directives --Office of Special
9 Affairs (“OSA”) Network Orders, HCOPL (Hubbard Communication Office Policy Letters),¹
10 HCOBS’s (Hubbard Communications Office Bulletins)², and Executive Directives, these policies
11 mandate “obliteration” of Scientology’s enemies and are commonly referred to as Attackers under
12 the banner of what was termed “Fair Game.”

13 2. Suppressive Persons are also referred to, among other names, as Attackers,
14 Merchants of Chaos, Merchants of Fear, Antisocial personalities, Anti-Scientists, Psychotics,
15 Squirrels, Cancer of Society, Criminals, and Bigots. These classifications, laid out by L. Ron
16 Hubbard’s directives, justify the destruction of Suppressive Persons. One does not need to be a
17 Scientologist or former Scientologist to be on Scientology’s “Enemies List.”

18 3. On March 7, 1965, Hubbard issued a Policy Letter on Suppressive Acts, which are
19 “defined as actions or omissions undertaken to knowingly suppress, reduce or impede Scientology
20 or Scientologists.”

21 4. Such Suppressive Acts include reporting crimes to law enforcement or government
agencies, advocating for victims of Scientology, or “public disavowal of Scientology or
Scientists . . . writing anti-Scientology letters to the press or giving anti-Scientology or
anti-Scientologist evidence to the press; [or] testifying as a hostile witness against Scientology in
public . . .”

5. The Policy Letter continues: “Suppressive Acts are clearly those covert or overt acts
knowingly calculated to reduce or destroy the influence or activities of Scientology or prevent case

¹ Hubbard Communications Office, or HCO, is the communications arm of Scientology, responsible for disseminating orders, policies, and other directives throughout Scientology.

² HCOBs dictate how to think about and handle anyone who speaks negatively of Scientology.

1 gains or continued Scientology success and activity on the part of a Scientologist. As persons or
2 groups that would do such a thing act out of self interest only to the detriment of all others, they
3 cannot be granted the rights and beingness ordinarily accorded rational beings and so place
themselves beyond any consideration for their feelings or well being.”

4 6. On December 2, 1966, L. Ron Hubbard issued an Executive Directive stating: “(a)
5 People who attack Scientology are criminals, (b) That if one attacks Scientology he gets
6 investigated for crimes, and (c) If one does not attack Scientology, despite not being with it, one is
safe.”

7 7. On March 28, 1972, Hubbard wrote a paper titled Counter Attack Tactics,
8 principled upon the idea that “when PR and Legal find themselves engaged in handling attacks,
9 Intelligence has failed.” Counter Attack Tactics laid out the “Plan,” referred to as Three Channel
10 Handling, to attack those who speak out against Scientology’s abuses and advocate for themselves
11 and others. The Plan requires identifying the “instigator” and then, using three different channels
12 or tactics, “[w]hen identified or even suspected as the instigator, draw up a project to cost him his
13 job,” “[d]raw up a second project at once to survey and discover what the person really is
14 defending and threaten it effectively,” “[e]xecute the projects rapidly,” “[o]n achieving success
15 inform PR so that PR can call off the PR counterattack and capitalize on any information gained if
16 it does not expose Intelligence,” and “[i]nform legal so Legal can replan and utilize the information
17 also gained to mop up.” These tactics are to be implemented by the Office of Special Affairs, or
18 OSA, previously Scientology’s Guardian’s Office (or “GO”).³

19 8. On January 10, 1991, HCO issued a Revised Policy Letter reinforcing that publicly
20 departing Scientology is a High Crime—the highest offense against Scientology. Anyone who
21 publicly leaves Scientology is automatically declared a Suppressive Person.

9. Actions against Suppressive Persons are primarily carried out by members of the
Sea Organization (commonly referred to as “The Sea Org”) who belong to OSA, which handles
Scientology’s internal security and outside legal affairs and serves as Scientology’s intelligence
and spying operation. The Sea Org serves as Scientology “clergy” and runs all Scientology

³ The Guardian's Office was established in 1966, and its initial mission was to protect the interests of
Scientology, monitor Scientologists, and gather information on individuals and organizations deemed
enemies of Scientology. The Guardian's Office was disbanded in 1983, and the bulk of its previous
functions were then assigned to OSA. OSA is also referred to as Department 20 or Scientology’s
Organization Board

1 organizations. The Sea Org offers a specialized college-type course⁴ to become a “fully hatted”
2 “Invest Officer” for OSA, or a Department of Special Affairs Investigator commissioned to
address and neutralize disclosure of Scientology’s conduct.

3 10. The Sea Org also maintains and controls a sophisticated internal ethics and justice
4 system that governs every Scientology member. Through its operatives and agents, OSA draws up
5 Counter Attack Tactics handlings and tracks, monitors, and directs retaliation campaigns and
6 ruinous litigation against whistleblowers, survivors of Scientology, and anyone else who exposes
7 Scientology’s unlawful activities. In essence, it is the department tasked with executing operations
8 against Suppressive Persons or attackers at the direction of Defendant Miscavige, who has
9 commanded Scientology since L. Ron Hubbard’s death.⁵

10 11. These policies and directives are not only carried out by the Sea Org (under the
11 direction of David Miscavige), but OSA also activates civilian (non-staff) Scientologists and
12 non-Scientologists allied with Scientology to carry out the operations launched by OSA.
13 Scientology has hundreds of policies and directives, called (among other things) “Public Image,”
14 “Safe Pointing,” and “Special Zone Plan,” that relate to infiltration of law enforcement and
15 government agencies through their front groups and social betterment programs to deter
16 investigation of Scientology.⁶

17 12. The Suppressive Person/Fair Game doctrine and OSA Network Orders are laid out
18 in internal Scientology directives that describe the actions to be taken to destroy its perceived
19 enemies. When one is deemed a Suppressive Person, that person is then Fair Game, as per L. Ron

20 ⁴ The training course, “Department of Special Affairs Investigations Officer Full Hat Check Sheet,” last
21 four weeks, five days each week from 9:00 a.m. to 10:00 p.m. and consists of reading, writing and
demonstrations to prove complete understanding of the directives taught.

⁵ Dec. of Mike Rinder, executed in Pinellas County, FL, Dec. 3, 2013. Rinder, a high-ranking Scientologist
from the age of six and until June 2007, served for an extended period as head of the Office of Special
Affairs (“OSA”). In this role, he provided David Miscavige with daily reports on every legal case, media
action, and investigation happening worldwide and created “Invest Reports” for Miscavige, which included
summaries of ongoing activities of private investigators and intelligence operations working against
Scientology “attackers.” Scientology policy requires members to determine to combat attackers by finding
out “what the person is seeking to protect and threaten[] that,” including family, and “create scenarios that
will cost someone their job by manufacturing false evidence against them.” After Rinder escaped
Scientology in 2007, he was subjected to these attacks himself, including via an extensive campaign of
intimidation, spying, stalking and harassment that continues today.

⁶ HCO Bulletin, 23 June 1960, “The Special Zone Plan”: “A nation or a state runs on the ability of its
department heads, its governors or any other leaders. It is easy to get posts in such areas unless one has
delusions of grandeur or fear of it. Don’t bother to get elected. Get a job on the secretarial staff or the
bodyguard, use any talent one has to get a place close in . . .”

1 Hubbard's directives and the directives of Scientology that Suppressive Persons "[m]ay be
2 deprived of property or injured by any means by any Scientologist without any discipline of the
Scientologist" and may be "tricked, sued or lied to or destroyed."⁷

3 13. The letters and orders that comprise the handling of Suppressive Persons and Fair
4 Game lay out the rules of engagement for OSA operatives, all Scientologists, and their allies, that
5 must be followed with precision until the "Attacker" is put out of commission by Scientology's
operation.

6 14. One order, entitled "Target, Defense," provides: "One cuts off enemy
7 communications, funds, connections. He deprives the enemy of political advantages, connections
8 and power. He takes over enemy territory. He raids and harasses. All on a thought plane – press,
9 public opinion, governments, etc."⁸

10 15. Another directive entitled "Battle Tactics" directs: "The prize is 'public opinion'
11 where press is concerned. The only safe public opinion to head for is they love us and are in a
12 frenzy of hate against the enemy. This means standard wartime propaganda is what one is doing,
13 complete with atrocity, war crimes trials, the lot. . . . Don't give the enemy breathing space."⁹

14 16. The ultimate purpose of the handling of Suppressive Persons or attackers is to
15 "totally restrain[] and muzzle[],"¹⁰ "obliterate,"¹¹ and "ruin utterly"¹² any individual they deem an
16 enemy. Scientology directs followers to "Spot who is attacking us. . . . Start feeding lurid, blood,
sex, crime actual evidence on the attackers to the press. Don't ever tamely submit to an
17 investigation of us. Make it rough, rough on attackers all the way."¹³

18 ⁷ October 18, 1967 Scientology HCO Policy Letter issued by L. Ron Hubbard (emphasis added). This
19 Policy is still in full force and effect today.

20 ⁸ Feb. 16, 1969 HCO PL entitled "Target, Defense."

21 ⁹ Feb. 16, 1969 HCO PL, "Battle Tactics," reissued with updated distribution Sept. 24, 1987.

¹⁰ March 28, 1972, Counter Attack Tactics.

¹¹ Feb. 16, 1969 Hubbard Commc'ns Office Policy Letter ("HCO PL") from L. Rob Hubbard, regarding
Battle Tactics.

¹² L. Ron Hubbard, *A Manual on the Dissemination of Material*, THE MAGAZINE OF DIANETICS AND
SCIENTOLOGY, March 1955 at 157.

¹³ Feb. 25, 1966 HCO PL, "Attacks on Scientology"

1 17. Suppressive Person Policies have been and remain the policy and practice of
2 Scientology, even to this day.¹⁴ Indeed, Defendants' use of Fair Game has been acknowledged by
3 courts in California for many years.¹⁵

4 18. One Los Angeles Superior Court judge observed that: "In addition to violating and
5 abusing its own members' civil rights, the organization over the years with its 'Fair Game' doctrine
6 has harassed and abused those persons not in the Church [of Scientology] whom it perceives as
7 enemies."¹⁶

8 19. Another opinion summarized a sample of Scientology's recent Fair Game tactics:
9 [P]laintiffs allege Scientology's agents committed the following acts
10 against them: surveilled them, hacked their security systems, filmed them,
11 chased them, hacked their email, killed (and attempted to kill) their pets,
12 tapped their phones, incited others to harass them, threatened to kill them,
13 broke their locks, broke into their cars, ran them off the road, posted fake
14 ads purporting to be from them soliciting anal sex from strangers, broke
15 their windows, set the outside of their home on fire, went through their
16 trash, and poisoned trees in their yards. This conduct was alleged to be
17 pursuant to Scientology's policies and procedures. According to plaintiffs'
18 complaint, Scientology's directives are that Suppressive Persons are to be

13 ¹⁴ Scientology claims to have discontinued this practice, but it demonstrably remains in full force and effect.
14 Specifically, an October 21, 1968 Policy Letter from L. Ron Hubbard reads: "The practice of **declaring** people FAIR
15 GAME will cease. FAIR GAME may not appear on any Ethics Order. It causes bad public relations. This P/L **does**
16 **not cancel any policy on the treatment or handling of an SP** ("suppressive person")." (Emphasis added.) In reality,
17 the only policy "ceased" was the writing of the words "Fair Game" on a "suppressive person order," also known as a
18 "Declare." The activities of Fair Game and Scientology's policies directing the tactics to deal with suppressive
19 persons have remained the same.

20 ¹⁵ These cases include *Church of Scientology v. Wollersheim*, (1996) 42 Cal. App 4th 628, 641 ("Declarations of former
21 members and officials of the Church...revealed the practices and policies of the Church, including its 'fair game'
doctrine and employment of litigation practices designed to 'bludgeon the opposition into submission.'"); *Hart v. Cult*
Awareness Network, (1993) 13 Cal.App. 4th 777, 784 ("According to church literature, a suppressive person or group
becomes 'fair game,' and a person or group which is fair game 'May be deprived of property or injured by any means
by any Scientologist without discipline of the Scientologist...[m]ay be tricked, sued, or lied to or destroyed.'");
Church of Scientology v. Armstrong, (1991) 232 Cal.App.3d 1060, 1067 ("These 'declares' subjected Armstrong to the
'Fair Game Doctrine' of the Church, which permits a suppressive person to be 'tricked, sued or lied to or
destroyed...[or] deprived of property or injured by any means by any Scientologist...'"); *Wollersheim v. Church of*
Scientology, (1989) 212 Cal.App 3d 872, 882 ("Wollersheim's bankruptcy and resulting mental distress was the direct
result of the Church's declaration that he was fair game."); *Allard v. Church of Scientology*, (1976) 58 Cal.App.3d 439,
447, n.4 ("The trial court gave appellant almost the entire trial within which to produce evidence that the fair game
policy had been repealed. Appellant failed to do so."); *id.* at 448 ("Inferences can be drawn that the church, through its
agents, was carrying out its own policy of fair game in its actions against respondent.").

¹⁶ *Church of Scientology v. Armstrong*, No. 420153, Memorandum of Intended Decision, Los Angeles Superior Court,
June 20, 1984 (Breckenridge, J.)

1 silenced by whatever means necessary. Scientology instructs members 'to
2 damage the person's professional reputation, file frivolous lawsuits, and
3 harass and surveil 'the enemy.' Scientology's 'policies and procedures
4 encourage and/or instruct followers to 'ruin [the individual] utterly.'¹⁷

5 20. In the past 70 years, Scientology, via Defendants, has conducted countless
6 sophisticated, well-funded and brutal operations against Suppressive Persons that have spanned
7 every decade and many countries. Scientology also has undertaken smaller but still devastating
8 operations against anyone or any group that it has labeled Suppressive or Fair Game.¹⁸

9 21. Here, Defendants have undertaken a campaign to ruin and destroy the life and
10 livelihood of Leah Remini—a former Scientologist of nearly 40 years, a two-time Emmy-award
11 winning producer, actress and New York Times best-selling author—after she was deemed a
12 Suppressive Person and declared Fair Game by Scientology in 2013, when she publicly departed
13 Scientology, a Suppressive Act as laid out by Scientology directives.

14 22. For the past ten years, Ms. Remini has been stalked, surveilled, harassed,
15 threatened, intimidated, and, moreover, has been the victim of intentional malicious and
16 fraudulent rumors via hundreds of Scientology-controlled and -coordinated social media accounts
17 that exist solely to intimidate and spread misinformation. Scientology has elevated the reach of
18 some of these posts by using its tax-exempt funds to pay social media companies like Twitter to
19 "promote" these posts. By paying to promote these posts and elevate them on Twitter, Defendants
20 demonstrate that these posts are not the work of a rogue Scientologist, but part of a coordinated
21 campaign to follow long held policy and destroy Ms. Remini. Defendants have also incessantly
harassed, threatened, intimidated, and embarrassed Ms. Remini's family members, friends,
colleagues, and business associates, causing her to lose personal relationships, business contracts,
and other business opportunities.

¹⁷ *Bixler v. Sup. Ct. for Cal.*, 2022 Cal. App. Unpub. LEXIS 302 (Jan. 19, 2022) (cited for references to factual allegations only and not court holding.)

¹⁸ In 1991, Time Magazine published a major investigation by reporter Richard Behar into Scientology entitled "The Thriving Cult of Greed and Power." The cover story devastated Scientology's public reputation and led David Miscavige to go to war against Time Magazine and Behar personally. For years, Behar was trailed and harassed by Scientology's private investigators. In addition, Scientology illegally obtained copies of his phone records and credit reports. Scientology also spent millions of dollars trying to defame Behar's reputation and that of Time Magazine.

1 23. Defendants have caused Ms. Remini significant and ongoing economic harm and
2 have forced her to endure a new but never-normal life in which Scientology's surveillance, abuse,
3 and lies are the punishing, inescapable, daily cost of exercising her First Amendment right and
4 moral duty to speak out about Scientology's conduct. Scientology's policies regarding Suppressive
5 Persons and Fair Game are not religious doctrine; they are old-school, mob-style tactics,
6 modernized, amplified, and weaponized by Scientology's far-reaching network, which goes
7 beyond just social media.

8 24. Despite spending nearly ten years of her life under constant threat and assault by
9 Defendants as a result of her public departure from Scientology, Ms. Remini has worked tirelessly
10 to advocate for current Scientologists, former members of Scientology, and non-Scientologists
11 who have bravely spoken out against Scientology or supported Scientology survivors and
12 whistleblowers.

13 25. Ms. Remini brings this action to recover compensatory and punitive damages for
14 the enormous economic and psychological harm that Defendants have inflicted upon her, to
15 remediate the harm that has been caused, and to punish and deter Defendants from continuing their
16 unlawful campaign of harassment and intimidation.¹⁹ Most importantly, she seeks injunctive relief
17 to end Scientology's policies against Suppressive Persons so that current and former
18 Scientologists, and others who wish to expose Scientology's abuses, including journalists and
19 advocates, may feel free to hold Scientology accountable without the fear that they will be
20 threatened into silence. This lawsuit does not challenge Scientology's ability to defend itself
21 through legal means.

II. THE PARTIES

22 26. Plaintiff, Leah Remini, is a resident of the state of California.

23 27. Defendant Church of Scientology International ("CSI") is a California corporation,
24 which at all material times, was doing business in the County of Los Angeles, State of California.
25 CSI's primary place of business and headquarters is located at 6331 Hollywood Boulevard, Suite
26 1100, Los Angeles, California 90028. CSI is controlled and directed by Defendant Miscavige,
27 directly and through officers and others who report to him. CSI is the licensee of Scientology's

28 ¹⁹ Leah Remini does not assert, and expressly disclaims, any claims relating to Scientology's conduct while she was a
29 member, which Scientology maintains are subject to arbitration pursuant to the enrollment agreements with
30 Scientology's members.

1 intellectual property (“IP”), including trademarks and other IP owned and administered by
2 Defendant Religious Technology Center, Inc. CSI in turn licenses Scientology’s IP to numerous
3 other Scientology-affiliated entities and organizations, which pay CSI licensing fees that it passes
through to the owners of the IP, including Religious Technology Center, Inc.

4 28. Defendant Religious Technology Center, Inc. (“RTC”) is a California Corporation,
5 which at all material times, was doing business in the County of Los Angeles, State of California.
6 RTC’s primary place of business and headquarters is located at 1710 Ivar Avenue, Suite 1100, Los
7 Angeles, California 90028. RTC is the principal management, security, and enforcement entity for
8 Scientology. Pursuant to an assignment agreement with Scientology founder L. Ron Hubbard,
9 RTC owns, administers and enforces certain IP rights, including Scientology’s trademarks and
10 rights in its so-called “advanced tech,” and it receives licensing fees paid for the use of those
11 rights, including their use in Scientology courses and course materials. Operating under Defendant
12 Miscavige’s direction, senior RTC officers oversee and direct the management of each of the other
13 Defendants listed herein. RTC and Miscavige also oversee and direct Defendants’ investigative
14 and policing operations, monitor members’ behavior, and handle matters concerning discipline and
15 punishment of members throughout all Scientology-affiliated entities, groups, and organizations.

16 29. Defendant, David Miscavige (“Miscavige”), is and at all material times was, a
17 resident of Los Angeles, California. Mr. Miscavige is believed to reside at 6331 Hollywood
18 Boulevard, Suite 1100, Los Angeles, California 90028 and his principal place of business is
19 located at 1710 Ivar Avenue, Suite 1100, Los Angeles, California 90028. Mr. Miscavige is the
20 “Chairman of the Board” (“COB”) of the RTC and the *de facto* leader in all aspects of the other
21 named Defendants, controlling and directing the activities of all Defendant entities herein. Among
other things, Mr. Miscavige personally directs, and during the times relevant to this Complaint, did
direct the management and operations of the other Defendants, including the practices and conduct
alleged herein.

17 **III. JURISDICTION AND VENUE**

18 30. This Court has jurisdiction over this action pursuant to California Code of Civil
19 Procedure § 410.10. Plaintiff seeks damages under the statutory and common law of the State of
20 California for Defendants’ wrongful actions.

21 31. Venue is proper in this Court pursuant to California Code of Civil Procedure § 395
because (a) some of the acts and transactions described herein occurred within this county; (b)
Defendants are or were registered to do business in the State of California and/or were doing

1 business within this county; (c) Defendants did do business in this county and Defendants'
2 principal places of business are located in Los Angeles, County; and (d) Defendant Miscavige is
an individual residing in this county.

3 **IV. FACTUAL ALLEGATIONS**

4 **A. Scientology Background**

5 32. "Scientology" was created by L. Ron Hubbard in 1952 following the publication of
6 "Dianetics: The Modern Science of Mental Health." Its practices are mandated by the writings,
thoughts, and teachings of Mr. Hubbard. These teachings are referred to as policies, "The Tech"
(Technology), and "Source."

7 33. The words and teachings of L. Ron Hubbard are the law of Scientology and the law
8 for Scientologists. The policies of L. Ron Hubbard cannot be changed, modified, or interpreted.
In fact, it is a High Crime in Scientology to disobey the exact words and teachings of L. Ron
Hubbard, no matter how antiquated, abhorrent, and illegal they may be.²⁰

9 34. Scientology's authority with respect to its members is absolute, precluding even a
10 role by law enforcement. Defendants strictly forbid members from contacting the police to report
any crimes committed by any practicing Scientologists, no matter how violent or heinous the
11 crime (except when directed by Scientology as part of operations against Suppressive Persons).²¹
12 Scientology trains its members how to lie to law enforcement. Scientologists are also forbidden
from cooperating with law enforcement against another Scientologist and testifying against other
13 Scientologists in court. Defendants also forbid Scientologists from seeking remedies in civil court
against other Scientologists.²²

14 35. The Church of Scientology is organized and operates through a global network of
15 corporations, trusts, and unincorporated associations and organizations. Scientology's
management is fully top-down, with all principal entities and organizations controlled and
16 managed under the direction of Defendant Miscavige, whose authority is second only to deceased
17 L. Ron Hubbard.

18 ²⁰ See October 18, 1967 Hubbard Communications Office Policy Letter (HCOPL) on "High Crimes," the pertinent
19 parts provide: "Recently, during the reorganization of WW, it came to light...that certain [policy letters] and HCOBs
were not to be followed...Any executive issuing such an order shall hereafter be considered as committing a high
crime..."

20 ²¹ See e.g., May 22, 1961 Policy Letter entitled "The Only Valid Security Check", which provides in relevant part:
"[W]e can promise you faithfully that no part of nor any answer you make here will be given to the police or state. No
scientologist will ever bear witness against you in Court[.]"

21 ²² *Id.*

1 36. Defendant Miscavige took control of Scientology in 1986 after L. Ron Hubbard's
2 death. Defendant Miscavige operates, manages, and/or controls RTC, CSI and the entire network
3 of Scientology organizations that fall beneath RTC and CSI. Defendant Miscavige is responsible
4 for ensuring the standards, policies, and ethics of Scientology, including those related to
5 Suppressive Persons and attackers of Scientology, are carried out.

6 37. Defendant Miscavige receives daily reports on and directs the operations of each
7 Scientology-affiliated entity and organization through "command channels," with built-in
8 redundancies to ensure he receives complete and timely information about all aspects of
9 Defendants' operations, including that his directives are fully carried out without variance. He
10 issues directives to every Scientology-controlled entity and every Scientologist, and also receives
11 reports from OSA on its operations against Suppressive Persons.

12 38. While every person who becomes an enemy of Scientology is "fair game" and
13 faces attacks from Scientology's OSA and RTC, Leah Remini is at the very top of Defendant
14 Miscavige's list of Scientology's enemies.

15 **B. Suppressive Persons or Attackers of Scientology**

16 39. Scientology deems an individual a Suppressive Person if they "actively seek[] to
17 suppress or damage Scientology or a Scientologist by Suppressive Acts."²³

18 40. Suppressive Acts are "acts calculated to impede or destroy Scientology or a
19 Scientologist[.]" Applicable to this case, examples of Suppressive Acts include, "[p]ublic
20 disavowal of Scientology or Scientologists in good standing with Scientology organizations" and
21 "[p]ublic statements against Scientology."²⁴

 41. Additional relevant Suppressive Acts include, "[b]ringing civil suit against any
Scientology organization or Scientologist,²⁵ performing welfare checks on family members of those
who departed Scientology, or reporting crimes by Scientology members to civil authorities.

 42. An individual engaged in any of these behaviors is deemed a Suppressive Person.

 43. Once declared a Suppressive Person, the Suppressive Person is known as "Fair
Game" and "has no rights of any kind" and must be silenced by whatever means necessary.^{26, 27}

²³ See Dec. 23, 1965 HCOPL on Suppressive Acts.

²⁴ January 30, 1993 HCOPL on "Suppressive Acts, Suppression of Scientology and Scientologists."

²⁵ *Id.*

²⁶ See July 21, 1968 Hubbard Communications Office Policy Letter (HCOPL) on "Penalties for Lower Conditions," which provides in pertinent part: "Enemy – Suppressive Person Order. May be restrained or imprisoned. May not be protected by any rules of the group he sought to injure as he sought to bar fair practices for others."

²⁷ Dec. of Vicki Aznaran, United States of America v. Steven Fishman, Case No. CR-88-0616-DLJ, NDCA, July 18,

1 44. From the time it was founded in 1953 to the present day, Scientology has inflicted
2 terror on people and organizations it deems to be its enemies pursuant to its policies and
3 directives.

4 45. OSA Operations consist of hundreds of directives written by L. Ron Hubbard.
5 These directives are considered law for all Scientologists and supersede the laws of any country or
6 state that a Scientologist lives in. Scientology believes their laws and Justice Codes are superior to
7 real law and refer to the laws as “wog law.” “Wog” is a derogatory term Scientology uses to
8 categorize a person who is not a Scientologist or any institution that is not under the full control of
9 Scientology.

10 46. One Scientology policy directs: “Don't react to Scientology justice as though it
11 were wog law. In society's ‘courts’ one is given the works, and truth has little bearing on the
12 findings. A mean judge or clever attorney and small legal errors decide a lot of their cases. Wog
13 courts are like throwing dice. There is huge cost and publicity and punishment galore even for the
14 innocent. So we must preserve our justice.”

15 47. The goal of OSA is to handle attackers or Suppressive Persons. The policies OSA
16 implements aim to harass, scare, silence or “ruin utterly” anyone who is considered a Suppressive
17 Person to Scientology. The goal of the Department is a silenced or muzzled Attacker.

18 48. Scientology's directives, laid out as Counter Attack Tactics, teach the methods to
19 use against individuals who are deemed Suppressive or Fair Game: “These persons can always
20 lose their jobs. . . [T]his is a point of vulnerability. If the person's job is . . . not valuable to him or
21 if he cannot be made to cost his job, something can be found which he is seeking to protect and it
can be threatened. . . . Find out what the person considers valuable and use it for restraint.” To
this end, OSA Operations targets their objects' family, career, reputation, and personal security.

 49. Suppressive Persons are “Critics” of Scientology and OSA Network Orders are
carried out by Scientology employees, civilian Scientologists, and agents hired by Scientology.
This creates a far-reaching network dedicated to the destruction of Scientology's targets.

 50. Scientology keeps close track of the assets, skills, and networks of civilian
Scientologists and agents associated with Scientology and its front groups so that it may deploy

19 1990. Ms. Aznaran served as President of Religious Technology Center (“RTC”) and, between 1984 and 1987,
20 Inspector General. In these roles, she oversaw the Scientology policy of Fair Game as it was levied against
21 Suppressive Persons. She testified that Fair Game against enemies was commonplace, and included “burglaries,
assaults, disruption of enemies' businesses, spying, harassing investigations, abuse of confidential communications in
parishioner filed and so on.” Anzaran provided “It is the stated policy and practice of Scientology to use the legal
system to abuse and harass its enemies.”

1 them in operations against Suppressive Persons or Attackers. For example, a civilian Scientologist
2 or one associated with a Scientologist or its front groups who has a cybersecurity company may be
3 activated by Scientology for an operation to gain information to which Defendants would not
normally have access.

4 51. Indeed, historically, Defendants hire lawyers who have then hired private
5 investigators (who may hire other private investigators) to surveil, follow, videotape and
6 photograph individuals who have been deemed Suppressive Persons. But Defendants do not limit
7 their hiring practices to licensed private investigators.²⁸

8 52. Based upon information and belief, operations against Suppressive Persons or
9 Attackers are paid for through Scientology's tax-exempt funds and under the false cloak of
10 religion. Between the financial resources of Scientology and the hyper-dedication and direction of
11 Scientologists, targets of these tactics cannot hope for a fair fight—or even to fight back at all.

12 53. Once a target is declared Suppressive and Fair Game, the target remains a focus of
13 Scientology until the goal is reached: “a silenced or muzzled attacker.” Until the target
14 (whistleblower, advocate, survivor, reporter, etc.) has lost the ability to speak out, Scientology
15 continues its pursuit.

16 54. Even death may not spare a target from these attacks. For example, though David
17 Miscavige's father, Ron Miscavige, died in 2021, Scientology continues to maintain hundreds of
18 websites dedicated to smearing him.

19 55. When an individual is declared a Suppressive Person by Defendant Miscavige
20 according to Scientology's directives, that individual is cut off from all contact with family
21 members, friends, and employers within Scientology because any Scientologist who maintains
contact with a Suppressive Person is also deemed guilty of a Scientology High Crime and subject
to punishment.

²⁸²⁸ HUBBARD COMMUNIS OFFICE MANUAL OF JUSTICE (1959), provides, in relevant part:

“Overt investigation of someone or something attacking us by an outside detective agency should be
done more often...It's very effective! Often investigation by a private detective has alone closed up
an entheta [anything upsetting to a Scientologist] source or a squirrel organization. In fact at this
writing I can't remember a time when it hasn't!”;

“When we need somebody haunted we investigate.”;

“When we investigate we do so noisily always. And usually mere investigation damps out the
trouble even when we discover no really pertinent facts.”;

“It's almost funny. We sometimes learn nothing useful and yet because people heard we were
investigating their consciences sent them into headlong flight or sudden collapse. There's power in
the question alone!”

1 56. Publicly declaring that a member has left Scientology is not the only offense
2 subject to attacks. Scientology treats asking for a welfare check on a family member who is a
3 member of Scientology; questioning, speaking about, or posting Scientology beliefs; filing a
4 lawsuit against or reporting a Scientologist; or even reading books or watching documentaries that
5 inform the public of Scientology beliefs and abusive practices as violations of Scientology policies.
6 Former members of Scientology can be labeled Suppressive Persons and subject to harassment,
7 stalking and other attacks for these activities.

8 57. The abuse leveled at Ms. Remini is part of a broader policy and practice of
9 intimidation. Other subjects of Defendants' Suppressive Person policies have included the United
10 States Government, including the Internal Revenue Service, the Federal Bureau of Investigation,
11 United States Attorneys,²⁹ elected officials, the American Medical Association, the National
12 Institute of Mental Health, Pulitzer Prize winning reporters, stand-up comedians, cartoonists,
13 university professors, district attorneys, judges, other law enforcement, social media users with as
14 few as ten followers, and a mother in Clearwater, Florida who was concerned about her son's
15 welfare, to name just a few.

16 58. Though carried out as doctrine, the application of Scientology's practices, certainly
17 as to those who, like Ms. Remini, have renounced membership, are contrary to law and subject to
18 review by courts. The banner of religious freedom does not, and could not, give Defendants license
19 to intimidate, harass, and abuse those who have exercised their choice *not* to associate with
20 Scientology. Religious freedom also does not allow Defendants the right to intimidate and attack
21 former Scientologists who act as whistleblowers to expose Scientology's wrongful conduct towards
them or others. Nor does it allow Defendants to apply their laws to do the same to those who were
never members.

 59. In addition to systematic and coordinated campaigns of harassment, including, but
not limited to, stalking and invasion of privacy, Defendants direct the creation of defamatory
websites and social media accounts to spread lies and misinformation about those who unmask
Scientology or tell their own stories of their own experiences as members. These websites accuse

²⁹ The United States Department of Justice recognized that Scientology uses Fair Game to "carte blanche . . . violate the rights of others, frame critics in order to destroy them, burglarize private and public offices and steal documents [.] . . . launch[] vicious smear campaigns, [and] spread[] falsehoods against those they perceived to be enemies of Scientology in order to discredit them and, in some instances, cause them to lose their employment." *US v. Kember, Budlong*, Sentencing Memorandum, Criminal No. 78-401(2) &(3) (D.D.C. Dec. 16, 1980) at <http://suppressiveperson.org/spdl/wp-content/uploads/1980/12/USA-v-Kember-Budlong-Sentencing-Memo-1980-12-16.pdf>

1 these whistleblowers of lying about their own experiences in Scientology, or in the case of
2 non-Scientologists, lying about Scientology, and publish a litany of defamatory assertions about
3 them.

4 60. Defendants have escalated their retaliation tactics in order to damage their targets'
5 reputations, as demanded by Scientology policies on Suppressive Persons and Fair Game. Agents
6 of Defendants picket targets' places of employment, residences, and neighborhoods with posters
7 falsely accusing them of crimes, such as child molestation, with the purpose of humiliating their
8 targets and destroying their reputations and job prospects. Defendants' agents have confronted
9 targets outside their homes, workplaces, and in airports, falsely accusing them of wrongdoing. This
10 harassment aims to create fear in those employing or associating with Scientology's "enemies."

11 61. The tactics used to silence and punish anyone deemed to be an enemy by
12 Scientology are well-known within Scientology. Because of these tactics, Scientologists are not apt
13 to report crimes while they are still members of Scientology. Sea Org members have gone to even
14 more drastic measures, including drinking bleach and other methods of suicide, rather than subject
15 themselves to OSA operations as Suppressive Persons. Others who escape are forced to go into
16 hiding, avoiding any communication with law enforcement, the press, or any former members of
17 Scientology to avoid being attacked as Fair Game.

18 62. Scientology's strictly followed policies on attack of Suppressive Persons were first
19 carried out under the command of L. Ron Hubbard and the Guardian's Office. After Hubbard's
20 death in 1986, David Miscavige and OSA and RTC continued strict implementation of these
21 abusive policies.

63. These directives lay out the game plan and are carried out with precision by
Scientology employees, civilian Scientologists, and non-Scientologists who agree to participate in
the destruction of Scientology's target.

64. The policies of Scientology were written by L. Ron Hubbard, who is the only
source for Scientology's teachings and laws. Because Scientology relies solely on the writings and
directives of Scientology (for nearly every single matter in life), the actions of Scientology and
Scientologists are consistent as demanded and evidenced by the policies and directives and by
their subsequent activities that follow those policies and directives.

65. The only person who can change Hubbard's policies is L. Ron Hubbard. As a result,
none of the laws that govern Scientology and Scientologists can ever be changed. If they were, it
would lead to a crisis of confidence within Scientology because Scientologists believe that

1 Hubbard is infallible, and his policies and teachings are perfect. As a result, Suppressive Person
2 policies and Fair Game policies will never stop because Scientology's policies cannot be changed.
3 It is up to outsiders, especially our legal system, to impose this change before more lives are
destroyed by these policies and the leaders behind them.

4 **C. Leah Remini**

5 **Ms. Remini's Indoctrination into Scientology**

6 66. While this lawsuit concerns what happened after Ms. Remini left Scientology, her
experience in Scientology helps to explain why Scientology has been so determined to silence her
and others.

7 67. Beginning at age eight, Ms. Remini effectively lost her mother as a parent when her
8 mother joined Scientology. Ms. Remini's mother often left her two daughters alone so that she
9 could devote herself to Scientology. At the age of 13, Ms. Remini and her sister were made to
10 leave the only home they ever knew and were forced to join the Sea Org by their mother. As part
11 of joining, they were forced to sign billion-year contracts. Ms. Remini was deprived of a formal
12 education or a normal childhood and made to perform manual labor and spend hours learning the
13 teachings of L. Ron Hubbard. She was taught as a child to believe that her personal sacrifice would
save the planet. Years of brainwashing and conditioning put Ms. Remini in a position where
Scientology was the only reality for her. As with most Scientologists, Scientology was Ms.
Remini's primary caretaker. She was a member of Scientology for over 35 years.

14 68. During the period of time when Ms. Remini was a Scientologist, she was forced to
15 pay for and undergo thousands of hours of Scientology training, at substantial cost to her, to move
16 up what is known as Scientology's Bridge to Total Freedom. These training sessions took many
17 forms of conditioning and abuse which involved verbally, physically, and sexually abusive
18 practices. One training technique known as "bull baiting" placed her, a young girl, with an older
19 male Scientologist who is required to find her "buttons" (vulnerabilities that would bother her),
20 screamed expletives at her, made sexually suggestive remarks to her, and verbally abused her for
21 hours in an effort to condition her to not react to abuse. These training routines ("TRs") which are
required for all Scientologists, are part of the procedures to condition Scientologists to accept
abuse and inflict abuse without hesitation. These TRs rob minor children of their natural protective
instincts and open them up to sexual, physical, and emotional abuse.

1 69. Ms. Remini estimates that she spent over \$5 million over the course of her time as a
2 Scientologist. These funds were spent on her so-called spiritual enlightenment and those of her
3 family members and friends. Approximately half of her funding was for services that she
4 purchased, as from any other business. Ms. Remini's donations also included giving to the
5 International Association of Scientologists ("IAS"), for which there is no exchange of Scientology
6 services. The IAS is known as David Miscavige's war chest. Scientologists are required to pre-pay
7 for their services and after Ms. Remini was declared a Suppressive Person, she was unable to
8 obtain repayment of monies she had in her and her family's Scientology accounts.

9 70. While Ms. Remini was a Scientologist, giving millions of dollars to Scientology,
10 serving as a public face for Scientology, recruiting people individually to join Scientology, helping
11 to move Scientologists on their bridge, and donating to outside groups at the behest of Scientology,
12 she frequently was held up as an example of a model Scientologist and praised repeatedly for her
13 contributions. She was awarded commendations by David Miscavige, Tom Cruise, and by the very
14 people who later attacked her in Scientology-produced videos, despite repeatedly having been
15 asked to appear in Scientology videos herself. As soon as she left and spoke out against
16 Scientology, she was labeled by the organization she supported financially as an untrustworthy
17 apostate, as has been the case for staff members, Sea Org members and other Scientologists who
18 have left Scientology or and who have spoken out, and for non-Scientologists who have made a
19 joke about Scientology, reported crimes against, or advocated for victims of Scientology.

20 71. Scientology's campaign to destroy Ms. Remini began in 2006, seven years before
21 she publicly left Scientology in the summer of 2013. This background is described solely to
provide context for Scientology's attacks on Ms. Remini after she publicly left Scientology.

 72. In 2006, Ms. Remini and her husband attended the wedding of Tom Cruise and
Katie Holmes in Italy. Cruise, David Miscavige's best friend, is essentially second in command in
Scientology. It is a High Crime in Scientology to criticize him in any way. In 2004, David
Miscavige told an audience of Scientologists at a gala in England that Cruise was "the most
dedicated Scientologist I know."

 73. The Cruise-Holmes wedding was billed within Scientology as "The Wedding of the
Century." Because of Mr. Cruise's status within Scientology and how important this event was,
Ms. Remini was shocked to discover that David Miscavige's wife, Michele ("Shelly") Miscavige,

1 was nowhere to be found. Shelly Miscavige held the title of "Assistant to Chairman of the Board
2 (COB)" and her job was to constantly record everything he said so that a team of secretaries could
later transcribe his words and orders for dissemination throughout Scientology.

3 74. When Ms. Remini asked a group of Scientology executives and Tom Cruise's
4 personal handlers, Tom Davis, Jessica Fescback, and Javier Ruiz, "Where is Shelly?," she was
5 immediately admonished by the group, despite the fact that she and Ms. Miscavige were good
friends.

6 75. Ms. Remini witnessed other behavior at the wedding that set off red flags for her,
7 including unethical contacts between various Scientology executives and others at the wedding
which she understood to be forbidden by Scientology teachings.

8 76. While in Italy, Ms. Remini called her Scientology assistant, Melinda Brownstone,
9 and asked her to type up a series of internal reports that Remini was taught to write, known as
Knowledge Reports ("KRs"), sharing her concerns about the behavior she had witnessed and
10 expressing her concerns about Ms. Miscavige's health and safety.

11 77. Ms. Remini dictated these reports over the phone to Brownstone, who wrote and
12 submitted these reports because, from a young age, Ms. Remini had been brainwashed into
believing that by filing reports like this, she was helping Scientology and saving her religion.

13 78. When Ms. Remini returned to Los Angeles, she was ordered to go to Clearwater,
14 Florida, to the Flag Land Base building, also known as "FLAG." FLAG is considered the spiritual
headquarters of Scientology, where Scientologists receive top-level services that cannot be
15 obtained anywhere else.

16 79. Ms. Remini was told that before she could receive the services she had planned on
17 getting while there, she would undergo a quick "ethics cycle". That purportedly quick ethics cycle
18 was one of her life's worst nightmares.

19 80. Upon arrival, Ms. Remini was presented with dozens of internal reports from
20 Scientologists complaining about her behavior at the wedding. It was clear to Ms. Remini that she
21 was being punished for asking where Shelly Miscavige was and for filing reports on David
Miscavige and others.

81. Ms. Remini was held at FLAG for four months while she was put through a process
that cost her hundreds of thousands of dollars and nearly led her to have a psychotic breakdown.

1 The Scientology process is called the "Truth Rundown," which is usually only reserved for Sea
2 Org members. Bruce Hines, a top-level Scientology case supervisor, said he was only aware of one
3 other civilian Scientologist put through the Truth Rundown process. David Miscavige
4 subsequently acknowledged that it was wrong to have subjected Ms. Remini to the Truth Rundown
5 and returned at least some of her money.

6 82. Simply put, Truth Rundown is a form of psychological torture meant to rewrite the
7 target's memories. It is used by Scientology when Sea Org members report an ethical issue within
8 the organization, and Scientology wants to erase their memory and implant new memories.

9 83. After months of psychological torture, Ms. Remini was nearing the point of
10 psychotic breakdown. She finally gave in, rescinded all of her reports, and admitted that she was
11 the problem in this situation (despite it not being true).

12 84. Finally, Ms. Remini was allowed to leave FLAG and return to Los Angeles, where
13 she was forced to lie to her colleagues, friends, and family about what happened while she was in
14 Florida.

15 85. Ms. Remini was made to make "amends" at FLAG not only to David Miscavige but
16 to Tom Cruise. For example, she was forced to donate money to name a seat in a theater after Suri
17 Cruise and was to raise money for donation to Scientology causes led by Tom Cruise.

18 86. After reports of terrible abuse emerged from Scientology's international base,
19 Golden Era Productions, in Riverside County, Remini endured another six months of punishment
20 for looking on the Internet and asking questions about the abuse.

21 87. After her punishment, Ms. Remini resigned from Scientology in 2013.

88. After leaving Scientology, Ms. Remini filed a missing person report on Shelly
Miscavige, who has not been seen in public for 17 years.

Leaving Scientology - Fair Game

89. In 2013, Ms. Remini formally and publicly left Scientology and became an
outspoken public advocate for victims of Scientology. As a result, beginning in 2013 and
continuing to this day, Defendant Miscavige and the other Defendants began to level one of their
most coordinated and malicious assaults against Ms. Remini as part of their policies related to
Suppressive Persons and Attackers.

1 90. Defendants enlisted dozens of current and former Scientologists to record
2 videotaped messages (in Scientology production studios) to make disparaging and false claims
3 against Ms. Remini—including false and defamatory statements that she was abusive to her
4 mother and daughter, and that she is a racist. These videos continue to be posted at
5 <https://www.leahreminithefacts.org/videos/> and <https://www.leahreminiaftermath.com/videos/>.

6 91. To discredit Ms. Remini's truthful public comments regarding Defendants,
7 Defendants also used and manipulated Ms. Remini's estranged and now deceased father, George
8 Remini and his third wife, Dana, to make false statements about Ms. Remini, including that she is
9 a liar, that she only wanted her name in the news, that she would not help to pay for his cancer
10 treatments, that she turned her back on her half-sister when she was in the hospital, that she
11 ransacked her dying grandmother's apartment, and that she has no morals. These false statements
12 were posted to websites created and controlled by Defendants and continue to be promoted or
13 re-posted by Scientology.

14 92. The statements Mr. Remini made were unquestionably false and contradicted by
15 email communications and financial records. Defendants never approached Ms. Remini to seek
16 comment or fact-check the false allegations her father made about her on camera. Additionally,
17 Ms. Remini never had a relationship of any sort with her father's third wife and only briefly met
18 her twice. Yet Scientology used Dana Remini as a reliable source of information about Ms.
19 Remini.

20 93. In 2015, Ms. Remini released *Troublemaker: Surviving Hollywood and*
21 *Scientology*. Ms. Remini's book, a memoir exposing Scientology's abusive conduct, went on to
become a New York Times bestseller. Ms. Remini's critical and successful memoir further
escalated Defendants' abusive tactics against her.

 94. While Ms. Remini was in New York in 2015 to promote her book, she became
aware that she was being followed by private investigators hired by Defendants. These private
investigators followed Ms. Remini to and from her hotel and to and from all interviews and media
appearances. Defendants' hired surveillance, consistent with Scientology directives, was so
intimidating that it made Ms. Remini fear for her physical safety. As a result, Ms. Remini, for the
first time in her life despite being a public figure, was forced to hire private bodyguards to ensure
her safety during her book tour.

 95. In addition to physically following and harassing Ms. Remini during her book tour,
Defendants sent disparaging and threatening letters to third parties who were promoting Ms.

1 Remini's book, including but not limited to ABC News Senior Vice President, Tom Cibrowski and
2 John Bentley. The intent of the letters was to silence Ms. Remini, damage her reputation, and in
turn, her ability to earn income from her book.

3 96. In 2015, Ms. Remini was set to appear on Anderson Cooper's CNN show to
4 promote "Troublemaker." Due to Scientology's history of aggressive litigiousness, the interview
5 was pre-taped so that it could be vetted by CNN's legal department. Before the interview began,
6 Mr. Cooper warned Ms. Remini that the interview might not air. Mr. Cooper told Ms. Remini that
7 when he aired a five-part series on physical abuse being perpetrated by David Miscavige
(Scientology: A History of Violence), he and his producers faced so many OSA attacks that they
8 might not be willing to face a new storm of harassment. Since Cooper's series aired in 2010, he
has never broadcast another story about Scientology. To this day, Defendants continue to maintain
attack websites against Mr. Cooper and his producers.

9 97. From 2016 through 2019, Ms. Remini created, produced and hosted the award
10 winning A&E documentary series Leah Remini: Scientology and the Aftermath ("Aftermath").
11 This documentary series told the stories of former members who were bankrupt, physically
12 abused, molested, and raped by Scientologists and how the organization covered up those crimes.
13 They told the stories of those whose families have been destroyed by Scientology's disconnection
14 policies, and of those who suffered retaliation for reporting crimes to non-Scientology authorities.
15 The documentary series won two Emmy awards, a Producers Guild Award, Independent
16 Documentary Award (Truth to Power Award), two Gracie awards (Alliance for Women in Media
17 Foundation), and the Barbara Blaine Trailblazer Award from Child USA, again intensifying
Defendants' efforts to silence and discredit her. Scientologists have also attacked Paul Bucci, the
President & Chairman of A&E Networks Group, by creating websites on him and A&E. Due to
this harassment A&E was reluctant to put themselves and their employees, their advertisers at risk
out of fear of further retaliation from Scientology and their agents. Contributors appearing on the
series were thereafter harassed and stalked by Scientology, including through disparaging websites
that were posted almost instantly.

18 98. Scientology was provided an opportunity to comment in every episode. Yet,
19 Defendants have done everything in their power to sabotage Ms. Remini's *The Aftermath* series.
20 Between November 2016 and February 2019, Defendants designed an operation to organize and
21 force practicing Scientologists to write at least 500 letters seeking the cancellation of Ms. Remini's
show. The letters were sent to the network heads at A&E, the CEO of Disney, and innumerable

1 advertisers and sponsors of the series, including Disney, Yahoo, Nissan, Coca-Cola, Nestle, and
2 Expedia, to name just a few.

3 99. Between April and May 2018, Defendants, through the President's office of
4 Scientology's Celebrity Centre in Hollywood, organized a meeting of Scientology celebrities and
5 other Scientologists active in the entertainment industry. In that meeting, attendees were drilled on
6 how to attack Ms. Remini's credibility, based on lies, using talking points that Scientology wrote.
7 A copy of that document shows that attendees were told to state to others that Ms. Remini's
8 contributors (survivors and whistleblowers) were criminals. This blanket smear was followed by
9 the false suggestion that the National Enquirer was more credible than Ms. Remini's documentary
10 series. Additionally, attendees were told to say that Ms. Remini paid survivors and whistleblowers
11 to appear in her documentary series, which is also false.

12 100. In addition to these hundreds of letters, Scientologists, at the urging of Defendants,
13 and in accordance with their Suppressive Person, OSA Network directives, HCOBs, HCOPLs and
14 Fair Game policies, OSA created a front group called the Interfaith Alliance to create the
15 appearance that religious leaders found the series one of religious bigotry. This group, none of
16 whom were actual clergy and all of whom were Scientologists, stood outside of the A&E
17 corporate offices and picketed, demanding cancellation of Ms. Remini's documentary series,
18 falsely claiming that she incited bigotry and hate crimes, including, but not limited to, murder.

19 101. Defendants and Defendants' operatives also engaged in efforts to harass and
20 threaten anyone involved in *The Aftermath*, most notably, ex-Scientologists who were
21 whistleblowers and survivors of Scientology's abuse who agreed to be interviewed for the
documentary series. Defendants then organized the harassment of non-Scientologists, like
producers, crew members, support staff, editors and their family members who were not involved
in the documentary series. They endured ongoing harassment by Scientologists; some of them
continue to be harassed to this day via email, texts and phone calls to their homes as well as their
family member's homes. Agents of Scientology who falsely claim to be journalists also call these
individuals to solicit false information about Ms. Remini for Scientology's attack websites against
her. After *The Aftermath* ended, Scientology publicly (but falsely) took credit for having secured
its cancellation.

102. In 2017, Defendants continued their campaign to harass and discredit Ms. Remini.
For instance, when Ms. Remini appeared on the Conan O'Brien show on January 25, 2017 to
promote *Aftermath*, Defendants' operatives sent Conan O'Brien a personal letter criticizing Ms.

1 Remini and claiming that Remini was only speaking out against Scientology for the fame, money
2 and attention. Mr. O'Brien commented that he has never before received a letter of this character
in his 24 years of hosting late-night talk shows.

3 103. Defendants also began to intentionally and fraudulently accuse Ms. Remini and her
4 *Aftermath* series of inciting hate crimes. In 2016, Defendants, well aware of the falsehoods being
5 leveled at Ms. Remini, accused Ms. Remini in tweets and on their websites of causing a man
6 named Brandon Reisdorf, whose parents were former Scientologists, to throw a rock through a
7 window at the Los Angeles office of Scientology. Mr. Reisdorf, who was forced to disconnect
8 from his brother and parents, was in the midst of a mental health crisis. Scientology policies ban
9 any sort of psychiatric or psychological treatment.

10 104. Both Mr. Reisdorf and his family have publicly stated that Ms. Remini had nothing
11 to do with this episode—yet Defendants continue to stand by their fraudulent accusations and
12 continue to disseminate this false information on social media and on its websites to this day.

13 105. And on January 11, 2019, Defendants falsely and maliciously accused Ms. Remini
14 and *The Aftermath* of inciting the brutal murder of a 24-year-old Taiwanese Scientologist,
15 Chih-Jen Yeh, in its Australian headquarters. Mr. Yeh was working as a security guard and was
16 escorting a woman to begin her program to join the Sea Org, when the woman's 16-year-old son
17 stabbed and murdered Mr. Yeh. Without any basis, Defendants wrote letters to the President of
18 A&E alleging that "the murderer...[was] incited by A&E and the Leah Remini/Mike Rinder
19 series." Ms. Remini has publicly condemned the boy's actions, yet Scientology and Scientology
20 operatives with over 200 Twitter accounts continually tweet and re-tweet intentionally false and
21 libelous information regarding the incident. A sampling of these tweets is below.



Hate Monitor
@standmonitor

...

.@LeahRemini's rap sheet includes attempted bribery, tampering with justice, and inciting hate—from vandalism to murder.

Watch the video Leah Remini—and the media doing her bidding—don't want you to see: standleague.org/reminiunhinged
#HoldLeahReminiAccountable



4:24 PM · Dec 5, 2022

10 Retweets 1 Quote 29 Likes



Hate Monitor
@standmonitor

...

Today is Day 41 of @LeahRemini blocking @standmonitor for simply displaying a video of her own words—and it's Day 1,537 since a man inspired by her hate speech murdered a 24-year-old Scientologist.
@GameShowNetwork



11:00 AM · Mar 19, 2023 · 1,285 Views

5 Retweets 21 Likes

1 106. During the years in which *Aftermath* aired on A&E, Defendants continued to stalk
2 and harass Ms. Remini. In 2017, Defendants hired International Investigative Group, Ltd. (“IIG”),
3 a company comprised of private investigators, to surveil and follow Ms. Remini while she was in
4 New York filming the 2018 movie, *Second Act*, and her TV series that aired from 2016 to 2018,
5 *Kevin Can Wait*.³⁰ Two of these private investigators were Saul Roth, a former Lieutenant in the
6 Nassau County Police Department in New York,³¹ and Yanti Greene. Messages obtained between
7 Mr. Greene and Mr. Roth in unrelated litigation reveal that “word is they [Scientology] want to kill
8 her.”³²

9 107. Defendants continued to stalk, surveil, and harass Ms. Remini from 2020 to the
10 present day. In July and August of 2020, Ms. Remini and residents of her neighborhood in Los
11 Angeles, California noticed a man in a white car, parked outside of Ms. Remini’s home. After
12 reasonable investigation, it was discovered that this man has a history of mental illness and a
13 violent criminal record. Upon information and belief, provided by former top Scientology
14 operatives, Defendants armed this man with a vehicle and money to stalk and surveil Ms. Remini.
15 Over the course of several weeks, at Defendants’ behest, this man rammed his car into the security
16 gates of Ms. Remini’s community and asked residents for Ms. Remini’s address, saying he was
17 waiting to get into her house, falsely claiming he had been there several times before, and that he
18 needed to get a bigger ladder in order to reach her bedroom window. He was eventually arrested
19 and then released, at which point he called the police to allege that Ms. Remini was holding
20 hostages at her home. After police responded to Ms. Remini’s house, he was again arrested.

21 108. Former Scientology operatives have acknowledged that Scientology has a practice
of seeking out individuals with mental illness or who are homeless or addicted to drugs, and other
vulnerable people in order to harass its enemies.

 109. To incentivize successful outcomes, OSA operatives are rewarded with bonus
points for “valuable final products,” including “intelligence furnished that effectively guides the
progress of Scientology”; “public matters and individuals which impede human liberty
investigated and exposed”; and “enemies of scientology depopularized to the point of total

³⁰ See April 21, 2021 Affidavit of Saul Roth in *Smith v. International Investigative Group Ltd.*, et al, NY Sup. Ct. No. 607393/2019 at 3.

³¹ See April 21, 2021 Affidavit of Saul Roth at ¶¶ 3, 13.

³² Ex. 25 to Memorandum of Law in Support of Motion for Partial Summary Judgment in the case of *Smith v. Int’l Investigative Group Ltd.*, Case No. 607393/2019 (Nassau Cty., NY, May 27, 2021) at Bates Nos. 001329-334.

1 obliteration.” There also are points for pickets, negative media, litigation filed, evictions, and
2 government actions, among others.

3 110. Upon information and belief, Defendants also hired Talon Executive Services, Inc.
4 (“Talon”), a company based in Costa Mesa, California, to stalk, harass and surveil Ms. Remini. In
5 2022, employees of Talon showed up at Ms. Remini’s neighbor’s home under the guise that Ms.
6 Remini arranged for Talon to install “free security and surveillance” technology there. In reality,
and based upon information and belief, Scientology had hired Talon to plant equipment that would
allow Scientology to spy on Ms. Remini. Ms. Remini only became aware of this ruse after her
neighbor called to thank her.

7 111. As recently as 2023, an unidentified male was recorded on video surveillance
8 arriving at Ms. Remini’s gated community in a vehicle armed with a hammer. This unidentified
9 man drove to Ms. Remini’s residence and smashed her mailbox, which she has to keep locked, to
illegally seize Ms. Remini’s personal mail. Police responding to Ms. Remini’s call surmised that
he had been sent by Scientology and, upon information and belief, he was sent by Defendants.

10 112. In addition to the physical stalking and harassment of Ms. Remini, Defendants’
11 never-ending harassment extends to Ms. Remini’s friends, family, and colleagues through a
12 process known as a “Noisy Investigation.” Noisy Investigation is a formal Scientology policy
13 written by L. Ron Hubbard involving pretending to conduct a criminal investigation in order to
sow chaos and discredit and create fear for its targets, as well as their family members, friends,
and colleagues.³³

14 113. OSA operatives pretending to be freelance journalists have implemented Noisy
15 Investigations against Ms. Remini to harass her. Scientology has harassed Ms. Remini; Ms.
16 Remini’s sister, Shannon Farrara, at her workplace in Los Angeles; Ms. Remini’s step-mother at
17 her residence in North Carolina; her deceased father, George Remini; various of Ms. Remini’s
former employees and their family members; her step-sons in San Jose (and a friend of one
step-son who tweeted that he was a big fan of *Aftermath*); her sister, Nicole Remini; and her niece
and nephew in Minnesota. In each case, Defendants’ agents claim to be reporters who are doing a
“story” about Ms. Remini and indicate that they have information that Ms. Remini was abusive to

19 ³³ See Hubbard Communications Office HCO Executive Letter of Sept. 5, 1966 entitled “How do to a NOISY
20 Investigation,” which states in pertinent part: “Here’s what you do. Soon as one of these threats starts you get a
21 Scientologist or Scientologists to investigate noisily. You find out where he or she works or worked, doctor, dentist,
friends, neighbors, anyone and phone em up and say I am investigating Mr./Mrs...for criminal activities...It doesn’t
matter if you don’t get much info. Just be NOISY –it’s very odd at first but makes fantastic sense and WORKS.”

1 her family and friends, and then attempt to get Ms. Remini's friends and family to comment on the
2 fake accusations or provide disparaging information.

3 114. Defendants' OSA pseudo-journalists have written false statements and articles on
4 Defendants' website, Freedom Magazine, at freedommag.org.

5 115. Freedommag.org includes various articles and videos aimed to defame and spread
6 fraudulent misinformation about Ms. Remini. Some of these videos are entitled, "Leah Remini: A
7 One-Woman Hate Machine"; "Leah Remini Told Dying Sister 'Get Charity Care,' Family Says";
8 and a video comparing Ms. Remini and the A&E network to Ku Klux Klan members who incite
9 hate crimes.

10 116. This decade-long, coordinated harassment of Ms. Remini, as well as her friends,
11 family, and business acquaintances, has caused severe emotional distress to Ms. Remini, has made
12 her fear for her physical safety and that of her family, and has caused the loss of business
13 opportunities, as laid out below.

14 **Social Media Attacks Against Ms. Remini**

15 117. In addition to physical stalking and harassment, from 2013 to the present day,
16 Defendants have implemented a mass coordinated social media effort against Ms. Remini to
17 spread false and malicious information about her through hundreds of Scientology-run websites
18 and social media accounts.

19 118. Hundreds of websites and social media accounts were created by Defendants,
20 and/or those working at the direction of Defendants, to harass, embarrass, shame, and defame Ms.
21 Remini. Each website was more explicit and offensive than the last, containing attacks on Ms.
Remini's character, her work, her family, her daughter, and every facet of her life. These hundreds
of websites are part of a larger group of websites against enemies of Scientology, which include
over 5,000 separate domains, and include the same coordinated messaging dictated by OSA.

119. For instance, in 2015 the Defendants created a website and front group entitled,
"Scientologists Taking Action Against Discrimination" ("STAND") at: www.standleague.org. The
Stand League Website is one of many websites that Defendants have used for years to attack, lie
about, and harass people who are deemed enemies of Scientology. This website has posted 76
blog posts and 14 articles harassing and churning lies against Ms. Remini, claiming over and over
that she is an "unhinged religious bigot who profits by spreading hate." Some of these articles are
entitled:

- 1 • “Are Leah Remini and A&E responsible for the Wave of Violence Against the
- 2 Jehovah’s Witnesses’ Kingdom Halls?”
- 3 • “Leah Remini is a Disgrace to Women of Valor Everywhere.”
- 4 • “As the World Remembers the Holocaust, Bigot Leah Remini Inspires Praise of
- 5 Hitler.”³⁴

6 120. Defendants also created <https://www.leahreminithefacts.org/>, an entire website
7 designed to attack, intimidate, and harass Ms. Remini. The main page of the website is a narrative
8 created at the direction of Defendants with various tabs leveling outrageous accusations against
9 Ms. Remini, including but not limited to: 1) filing a false police report and then attempting to
10 extort Scientology, and 2) abusing family members, including her half-sister, Stephani, and father,
11 George Remini, both of whom have since passed away. The site also includes articles entitled:

- 12 • Leah Remini to Dying Sister: “Get Charity Care,” with headline reading, “Remini’s
- 13 former stepmother lets loose on how Leah ‘made a complete mockery and disaster’
- 14 of sibling Stephani Remini’s death.”
- 15 • When Vengeance Leads to Words, Words Lead to Hate and Violence, with headline
- 16 reading, “Leah Remini has incited the very bigotry and hate that she herself was
- 17 fearful of and abhorred as a Scientologist.”

18 121. This website includes a separate tab with 55 videos recorded at the direction of
19 Defendants eliciting negative commentary from individuals, some of whom Ms. Remini did not
20 even know or have any real interaction with.

21 122. The online attacks do not end there. Defendants created
<https://www.leahreminiaftermath.com/>, with excerpts entitled, among others, “How Leah Remini
Viciously Breaks up a Family,” “How Leah Remini Callously Treats her Own Family,” and
“Leah’s Anti-Religious Sugar Daddy’s History of Drug Dealing and Cons.”

123. This website includes 131 videos recorded at the direction of Defendants eliciting
false and defamatory commentary from individuals regarding Ms. Remini and 61 blog posts
leveling false and defamatory claims, including, “Another Criminal Remini Source Returns to
Jail,” “A&E and Leah Remini Spread Hate,” “Remini: Aftermath Propaganda Inciting Religious
Hate,” “Leah’s Anti-Religious Sugar Daddy’s History of Drug Dealing and Cons,” “Leah’s New
Liar 4 Hire is a Proud Confederate Flag Lover,” “Leah Remini’s Paid Liar,” “Leah Remini’s

³⁴ This accusation is particularly egregious, as Ms. Remini’s mother is Jewish.

1 Aftermath: Exposed As Lies Once Again,” “Leah Remini’s Family Expose Leah’s Lies,” “Leah
2 Remini’s FRAUD,” “Total Fraud,” “Leah Remini’s Real Aftermath: Hate Speech, Threats, and
Violence,” and “Leah Remini: The Dr. Jekyll and Ms. Hyde of Hollywood,” among many others.

3 124. This website also includes a link to a series of letters written by current members of
4 Scientology in a concerted effort to prevent the production of *Aftermath*.

5 125. In addition to websites created by Defendants and its employees, there are hundreds
6 of Scientology-run Twitter accounts that are actively tweeting daily misinformation about Ms.
7 Remini in furtherance of the Suppressive Person and OSA operations and attacks that Defendants
8 are deploying against her. Based upon information and belief, these individuals create Twitter
accounts for the purpose of harassing Ms. Remini and other whistleblowers and advocates who
have been deemed Suppressive Persons or attackers of Scientology, buy followers on social media,
follow each other’s accounts, and coordinate their attacks on Ms. Remini.

9 126. For instance, since 2017, @standmonitor, created and run by Defendants, has
10 posted thousands of malicious and harassing tweets about Ms. Remini. In March 2023 alone, they
11 have posted over 247 tweets aimed at Ms. Remini, includes dozens of photoshopped images of Ms.
12 Remini in “I love rapists” apparel with similar fraudulent messages purporting to show Ms.
13 Remini’s support of rapists under the hashtag, #ReminiLovesRapists. Just a few of these photos is
14 included herein, but hundreds of similar images appear under Defendants’ Twitter accounts:
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Hate Monitor
@standmonitor

...

After @LeahRemini defended rapist Paul Haggis as a "gentleman" to the media and as a "victim" to a jury, there's no denying she went out of her way to prove she loves rapists.

But the tattoo collection takes it to a new level. #ReminiLovesRapists



7:03 PM · Apr 17, 2023 · 152 Views

Headline



Who said supporting rapists couldn't be colorful?

Certainly not @LeahRemini.

Hence this look from the #ReminiLovesRapists collection.



4:27 PM · May 21, 2023 · 6,653 Views

2 Retweets · 3 Quotes · 11 Likes

127. Scientology-operated Twitter accounts make unsubstantiated claims that Ms. Remini is abusive to her daughter, who is now 18 years old. For instance, on March 22, 2023 @standmonitor tweeted that “@Leah Remini trains her daughter to beat little girls.” And @vettedfacts claims that Ms. Remini’s daughter left “her toxic home life” because Ms. Remini “called her daughter a c**t, all the time.” Scientologist Phil Maasen tweeted “Leah Rimjob is a hateful c*** & it shows even on her stupid, boring game show, citing Leahreminithefacts.org, a website run by Scientology.

128. Defendants, or individuals directed by Defendants, have tweeted untrue and highly damaging claims that Ms. Remini has involuntarily committed her college daughter to a psychiatric facility. These tweets also included questions like “Where is Sofia,” leaving Ms. Remini to fear that Scientology operatives and agents were trying to track down her daughter’s location. These claims have caused Ms. Remini to fear for the safety of her daughter.

129. Defendants, or individuals directed by Defendants, also have control over hundreds of Twitter handles which are regularly used to attack Ms. Remini.³⁵ Indeed, while there are

³⁵ To name just 31 active Twitter accounts, controlled and/or directed by Defendants or persons working for

1 virtually hundreds of Twitter accounts controlled and run by Defendants which actively tweet false
2 and defamatory information against Ms. Remini on a daily, weekly or monthly basis, 31 accounts
3 have tweeted 1,398 tweets about and against Ms. Remini in March 2023 alone. A few examples of
4 the many defamatory tweets from other Twitter handles are below:



19 Defendants, that have spread lies and hate against Ms. Remini in the month of March alone, see :e.g.
20 @BFTSTANDleague; @CESTANDleague; @DMStandLeague; @evamahoney101; @FreedomEthics;
21 @gsstandleague; @standmonitor; @sliverson; @JMStandLeague; @JGStandLeague; @jimrossmeskimen;
@JohnAllender5; @JPdarkn; @DorisPansy534; @SoulPrisoner; @KiwiBoy2020; @lauriejbart; @LCStandLeague;
@MediaEthicsChk; @MKTSTANDleague; @LW_STANDleague; @QReligious; @qcus007; @STANDleague;
@ScientologyDad; @EndBigotryNow2; @ItsBklynSteve; @parismorf; and @XanthiaHare.

1 (1) a weekly “chat podcast”; and (2) a weekly podcast about Scientology. The contract gave
2 iHeartMedia the option to renew each of the two podcasts for an additional two seasons.

3 134. The May 1, 2020 contract was signed by Ms. Remini and Mike Rinder, a former
4 Scientologist, and Conal Byrne, the President of iHeart Podcasts.

5 135. Ms. Remini and Mr. Rinder co-hosted their Scientology-related podcast, called
6 *Scientology: Fair Game*. This podcast included their accounts of Scientology, including its policy
7 and practice of inflicting abusive tactics in the name of Fair Game on those who are deemed to be
8 enemies of Scientology.

9 136. On March 4, 2022, as part of its Fair Game campaign and in order to derail her
10 podcast, Defendants directed and controlled the publication of an article at
11 [https://www.freedommag.org/blog/iheart-produces-outrageous-bigotry-and-they-wont-talk-about-i](https://www.freedommag.org/blog/iheart-produces-outrageous-bigotry-and-they-wont-talk-about-it-0be7bf)
12 [t-0be7bf](https://www.freedommag.org/blog/iheart-produces-outrageous-bigotry-and-they-wont-talk-about-it-0be7bf), claiming that iHeartRadio “allows Remini, in obscenity-laced and abusive language, to
13 insult, defame and demean Scientologists.”

14 137. The article details the measures taken at the direction of Defendants to interfere
15 with and terminate Ms. Remini’s contract with iHeartMedia. For instance, Defendants openly
16 admit that they called and emailed iHeartMedia’s executive vice president and chief
17 communications officer, producer, and the podcast audio editor in an attempt to prevent Ms.
18 Remini’s podcast from airing.

19 138. Indeed, Defendants even took credit for advertisers pulling their advertising from
20 Ms. Remini’s podcast on iHeartRadio.

21 139. Throughout the duration of the contract, Defendants engaged in continuous efforts
to end Ms. Remini’s contract with iHeartMedia. Defendants directed individuals to follow and
harass podcast producers until those producers grew so fearful that iHeartMedia made the decision
to terminate the relationship with Ms. Remini to protect its employees and agents, even though the
show was successful in its ratings.

140. Ultimately, iHeartMedia ended its contract with Ms. Remini after its last episode
aired on March 7, 2022.

AudioBoom Contract

141. On August 1, 2022, Ms. Remini entered into a contract with Audioboom Limited to
be the exclusive audio advertising sales representative for the *Scientology: Fair Game* podcast for
one year. The contract was signed by both Ms. Remini and Stuart Last, the CEO of Audioboom
Limited.

1 142. On August 3, 2022, at the direction of Defendants, STAND sent a letter to CEO
2 Last informing him that “Audioboom will soon be syndicating the hate podcast of two rabid
3 anti-Scientologists.” The letter goes on to explain that “[w]hen the podcast was last running, we
4 reached out to companies to inform them this was the defamation and bigotry they were paying for
5 through their advertising; we heard back from chief communications and marketing officers from
6 Verizon to eBay confirming their ads were no longer running on this hate podcast. The podcast
7 shortly thereafter lost all commercial advertising. Audioboom advertisers deserve the decency of
8 being informed you intend to identify their brands with defamation and hate. We will be so
9 informing them.” The letter is signed by 39 Scientologists and was also sent to the CFO, COO,
10 Director of Operations & Communications, VP of US Content & Partnerships, and Content
11 Manager for Audioboom.

12 143. On August 10, 2022, at the direction of Defendants, STAND sent a letter to Julie
13 Hansen, the US CEO of one of Audioboom’s advertisers, Babel, addressing the podcast and
14 stating, “[w]e trust that, like Verizon, eBay, State Farm and countless other companies, this kind of
15 dehumanizing, hateful content violates your ad-buying guidelines and could not be further from
16 your brand values. Audioboom syndicates hate. Please pull your advertising from this platform.”

17 144. On August 18, 2022, the Chief Content Officer of Audioboom, Brendan Regan,
18 sent the following to agents of Ms. Remini:

19 StandLeague.org has been contacting Audioboom's advertisers saying that we're
20 promoting hate as a company by working with Fair Game. They've sent 6 emails to
21 the CEO of PrettyLitter alone, a client not even associated with Fair Game.

Are you aware of this and has Fair Game been impacted by this before? From the
trailer that was just released it alludes that this may have been the case at iHeart.

145. On August 22, 2022, at the direction of Defendants, STAND sent a letter to the
CEO of Candy Capital, Nick Candy, a significant investor in AudioBoom, informing him that,
“[w]hen this hate podcast was streaming on its previous platform, Verizon, State Farm, eBay and
others pulled their ads upon learning they were sponsoring hate. All commercial advertising then
ceased on the podcast. There have been no new episodes since March 2022,” and asking that, “[a]s
the company’s largest investor, we write requesting you do something about its syndication of
hate.”

1 146. On August 30, 2022, Ms. Remini's agents received a communication from an
2 Audioboom executive which marked the formal termination of Ms. Remini's contract with
3 AudioBoom. This communication specifically noted that the termination of Ms. Remini's
4 AudioBoom contract was due to "STAND's harassment and intimidation of Audioboom's
employees" as well the false and defamatory accusations made by STAND to AudioBoom and its
advertisers, and the negative business implications that would reasonably ensue.

5 **Game Show Network- People Puzzler**

6 147. In January of 2021, Ms. Remini began hosting the show, "People Puzzler" on the
7 Game Show Network, a show which featured contestants answering crossword-style clues about
8 pop culture and celebrities.

9 148. Defendants, in their usual course of action of attacking and harassing Ms. Remini,
10 began posting open letters to the Game Show Network about how it should stop airing a show
11 which allows an "unhinged bigot" to host, as well as claiming that the Game Show Network is
12 employing a "rape apologist as their host" and that "Remini obviously agrees...it's not a big deal'
to sexually abuse women."

13 149. Defendants also assailed the advertisers of the Game Show Network urging these
14 advertisers, including but not limited to Kellogg's and Proctor & Gamble to pull their support
15 from the network by falsely asserting that Ms. Remini has inspired "hundreds of threats and acts
16 of violence...including declarations of intent to...murder Church [of Scientology] members."

17 150. Defendants also use Twitter to post images of Ms. Remini juxtaposed against the
18 logos of well-known brands as part of an effort to leave the impression that major brands are
19 pulling out as advertisers of "People Puzzler" due to Ms. Remini, including advertisers that have
20 not withdrawn their support.

21 151. Defendants also sent OSA operatives claiming to be journalists to the set of People
Puzzler, asking producers about "claims" that Ms. Remini is allegedly abusive in the workplace.

152. Production on the fourth season of People Puzzler should be underway. However,
production has not started, and Ms. Remini has not been contacted to begin the new season,
which, upon information and belief, is the result of the ongoing harassment experienced by the
network.

VICE News Documentary

153. In December of 2022, Ms. Remini was contacted by a documentary filmmaker and correspondent and producers for Vice News to make a documentary about the disappearance of Defendant Miscavige's wife, Shelley Miscavige.

154. After two months of creative discussions between Ms. Remini and Vice, Ms. Remini's agents were abruptly informed on March 2, 2022, that the project would not be moving forward. Based upon information and belief, Vice ceased its discussions with Ms. Remini due to Defendants' Fair Game campaign.

ID/PR

155. On February 24, 2023, Scientology started a new campaign against Ms. Remini.

156. Ms. Remini has been a client of the entertainment publicity firm ID/PR for nearly a decade. During her time as a client, Ms. Remini would take a hiatus occasionally when she didn't plan to do any press appearances and would therefore not pay a retainer during this time.

157. ID/PR represents hundreds of entertainment industry figures, from actors to directors to writers. It also represents production companies and other media businesses.

158. Other clients of ID/PR have, from time to time, made jokes or statements related to Shelly Miscavige or Tom Cruise. Scientology's immediate response to those individuals was vicious attacks on social media, publicly calling these individuals, among other things, bigots.

159. This is a standard operating procedure for Scientology to evoke Scientology sympathy for being attacked by alleged religious bigots.³⁶

160. On February 24, 2023, Scientology's OSA Operations began an attack on Ms. Remini's publicity firm. Through official Scientology accounts and Scientology-controlled accounts, operatives began disseminating a set of conspiracy theories that were utterly false and defamatory and involved Kelly Novak, the founder of ID/PR, being the leader of an anti-Scientology cabal. Scientology also posted pictures of Ms. Novak with Harvey Weinstein, suggesting that she supported sexual abuse.

161. Other conspiracy theories included the false allegation that Ms. Remini was the head of ID/PR and covertly directed an anti-Scientology campaign from her position.

³⁶ Feb. 17, 1966 HCO PL entitled "Public Investigation Section," which reads in pertinent part: "Associating the attacking group's activities with reprehensible groups in the past by using similar descriptive words will be found very effective. For example, if the work "white" has been made hateful to the public by some past criminal group we use "white" in our descriptive terminology concerning the group that is attacking us and whom we are investigating."

1 162. Scientology then started tagging the Twitter accounts of other celebrities known to
2 be clients of ID/PR to ask them if they were aware of this non-existent anti-Scientology
3 conspiracy being run by ID/PR.

4 163. All of these tweets, which eventually grew to over 100, were intended to get Ms.
5 Novak to buckle under the pressure and drop Ms. Remini as a client, which would further isolate
6 Ms. Remini in the entertainment industry.

7 164. Ms. Novak later direct messaged the Scientology account @StandMonitor and told
8 them that Ms. Remini was no longer a client.

9 165. At the time, Ms. Remini was also on hiatus with ID/PR, as she did not have any
10 press commitments. She, however, remained a client of the firm as she had been for many years.

11 166. Scientology tweeted that Ms. Novak had dropped her as a client. Official
12 Scientology and Scientology-controlled accounts cheered on this news and praised Ms. Novak for
13 dumping Ms. Remini.

14 167. Scientology further pushed the idea that influential entertainment industry figures
15 abandoned Ms. Remini due to her “toxicity” and “bigotry.”

16 168. A few days after her initial direct message to @standmonitor, Ms. Novak messaged
17 the account again to tell them that not only was Ms. Remini a client of ID/PR but that they were
18 also misrepresenting her words.

19 169. Scientology then turned on Ms. Novak again and started attacking her and Ms.
20 Remini, falsely suggesting that Ms. Remini had threatened Ms. Novak into retracting her previous
21 direct message.

22 170. Since this defamatory campaign began, official Scientology accounts have tweeted
23 these defamatory allegations well over 100 times.

24 171. Since the day Ms. Remini left Scientology, Defendants have stalked Ms. Remini,
25 harassed Ms. Remini, disseminated hateful, false, and defamatory information about Ms. Remini,
26 and done everything in their power to interfere with any and every business relationship in an
27 effort to prevent her disclosing what goes on inside Scientology.

28 172. While Defendants have not succeeded in “muzzl[ing],” “obliterat[ing],” nor
29 “ruin[ing] utterly,” they have threatened and harmed what Ms. Remini holds most valuable—her
30 family, her security, her reputation, and her career. Scientology has orchestrated, and continues to
31 impose, a daily drumbeat of lies, misinformation, harassment, surveillance, threats, and invasions
32 of Ms. Remini’s privacy.

1 173. Scientology has made the expected abuses and harassment a weight Leah Remini
2 always carries, knowing that she will be followed, her trash will be searched, her image distorted,
3 and her college-age daughter baited. It has made virtually every contract Ms. Remini is offered
4 problematic, and deterred her from seeking opportunities, for fear of what would be unleashed on
5 her business partners—all exactly as Defendants intended.

6 174. Defendants have committed a litany of legal violations that must be restrained and
7 remedied. Defendants' constant, life-altering, tortious behavior cannot continue.

8 ***Scientology's Pattern and Practice of Abusing Those Deemed Suppressive Persons***

9 175. Scientology's campaign against Leah Remini is rooted in Scientology policies and
10 is consistent with, and a continuation of, similar efforts. A few examples, though not an exhaustive
11 list, are described below.

12 176. In 1971, journalist and Holocaust survivor Paulette Cooper published an
13 investigative book about Scientology's abusive practices and criminality entitled "The Scandal of
14 Scientology." According to files later seized by the FBI, Hubbard, implementing the policies he
15 wrote, designed plans and activities against her to silence and destroy Paulette Cooper as a
16 Suppressive Person.

17 177. Upon Hubbard's command, the Guardian's Office initiated an operation named
18 "Operation Dynamite," which was intended to frame Cooper. Agents for the Guardian's Office
19 obtained Cooper's fingerprints, her letterhead, and gained access to her typewriter without her
20 authorization, and manipulated a bomb threat sent to Scientology. As a result, Cooper was indicted
21 by federal authorities. Cooper was later fully vindicated when an FBI raid of Scientology in 1977
uncovered internal Scientology directives about the plan to frame her.

15 178. In 1976, because Cooper had not yet been silenced, Hubbard commanded the
16 Guardian's Office to initiate an operation called "Operation Freakout." The operation included
17 plans to attribute to Cooper threats against President Ford, Secretary of State Kissinger, and Arab
18 consulates. The stated goal was to get Cooper "incarcerated in a mental institution or jail or at least
19 to hit her so hard that she drops her attacks" and "[t]o remove PC from her position of power so
20 that she cannot attack the C of S [Church of Scientology]."

21 179. Over nearly a decade, Scientology continued its mission to follow the policy to
destroy Cooper's reputation, her mental health, and her life, including but not limited to destroying
her father's finances and business, illegally wiretapping her phones, having agents of Scientology
befriend her and move in with her to spy on her; send smear letters filled with lies to her friends

1 and family; paper her neighborhood with fliers filled with lies about her sexual activities; have her
2 book officially imported into countries that had much stricter libel laws so Scientology could sue
her; and break into her psychiatrist's office to steal her medical records.

3 180. In 1973, upon Hubbard's command and his wife Mary Sue Hubbard's leadership,
4 the Guardian's Office initiated an operation called "Operation Snow White." At the time,
5 Scientology faced significant scrutiny from governments worldwide, especially in the United
States. These government agencies were put on Scientology's target list and they too received
"Guardian's Office Handlings."

6 181. By the time it ended in 1977 with a massive FBI raid, Operation Snow White had
7 become the most extensive infiltration into the United States government and its agencies in
8 history. Thousands of Scientologists obtained jobs to infiltrate the federal government to steal
records, destroy records, alter records with false information, and gather intelligence on the federal
government's investigations into Scientology and L. Ron Hubbard.

9 182. The Department of Justice Sentencing Memorandum³⁷ for the Scientology
10 members indicted in the conspiracy reads:

11 The brazen and persistent burglaries, thefts and buggings directed against the United
12 States Government were but one minor aspect of the defendants wanton assault
upon the laws of this country. The well-orchestrated campaign to thwart the federal
13 Grand Jury Investigation by destroying evidence, giving false fingerprints in
response to a Grand Jury subpoena, harboring a fugitive, kidnapping a witness,
14 preparing an elaborate cover-up story and assisting in the giving of false statements
to the Grand Jury shows the contempt which these defendants had for the judicial
15 system of this country. . . . The standard of human conduct embodied in such
practices represent no less than the absolute perversion of any known ethical value
16 system. In view of this, it defies the imagination that these defendants have the
unmitigated audacity to seek to defend their actions in the name of 'religion.'

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20 ³⁷ *United States v. Hubbard*, 686 F.2d 955 (D.C. Cir. 1982), Sentencing Memorandum of the United States
of America, Dec. 3, 1979.

1 183. Scientology had also successfully infiltrated governments in 30 countries
2 worldwide and Interpol, the international organization that facilitates law enforcement cooperation
globally.³⁸

3 184. In 1975, Scientology landed in Clearwater, Florida, intending to turn it, per
4 Hubbard, into a "Scientology city." But Scientology entered Clearwater under a pseudonymous
entity and began buying up well-known properties in downtown Clearwater.

5 185. For a period, Scientology operated under the name of a shell company called
"United Churches of Florida."

6 186. The plan to infiltrate Clearwater and take it over was known internally in
7 Scientology as "Project Normandy." Once city officials became aware that Scientology, not the
8 United Churches of Florida, was buying up properties in Clearwater, officials like Mayor Gabe
Cazares became alarmed and started to speak out. Cazares said Scientology's attempt to take over
Clearwater in such an underhanded way was a "paramilitary operation by a terrorist group."

9 187. For expressing his concerns, Cazares was declared Fair Game and subject to one of
10 the more horrific sets of operations in Scientology history. The goal of these operations remained
11 consistent with Scientology's Fair Game laws: to "silence and muzzle" and "obliterate" the
attacker.

12 188. Most of what is known about attempts to destroy Cazares was discovered after the
FBI raided Scientology buildings in 1977.

13 189. At least five significant operations were conducted against Cazares by Scientology.
14 The names of these operations included "Operation Cazares Handling," "Operation Keeler,"
"Operation Speedy Gonzales," "Project Taco-Less, and "Operation Italian Fog."

15 190. While he was in Washington DC (Cazares was running for Congress at the time), a
16 Scientology operative worked her way into Cazares' life and convinced him to give her a ride.
17 Another Scientology operative pretended to be hit by Cazares' car. Cazares' Scientology
companion in the car persuaded him not to return to the scene.

18 _____
19 ³⁸ March 13, 1961 HCO PL: Department of Official Affairs: Issue 1, stating in pertinent part "f. The action
20 of bringing about a pro-Scientology government consists of making a friend of the most highly placed
government person one can reach, even placing Scientologists in domestic and clerical posts close to him
and seeing to it that Scientology resolves his troubles and case;"
21 <https://www.nytimes.com/1993/10/14/us/scientologists-granted-tax-exemption-by-the-us.html?sec=&spon=&pagewanted=all>

1 191. The goal of Operation Keeler was to give the media and Democratic Party officials
2 to whom Scientology operatives wrote the impression that Cazares was not only involved in a
3 hit-and-run but that the passenger in his car when the accident happened was a woman with whom
he was having an extramarital affair.

4 192. Scientology had operatives and agents call Cazares's home pretending to be women
5 who had a sexual interest in Cazares to destroy his marriage. In addition, Scientology operatives
6 planted a fake marriage certificate in Mexican government files to try and frame him for bigamy.
7 At one point, Cazares hired Merrell Vannier to serve as his attorney as he took on Scientology.
8 However, Cazares later learned that Vannier was, in fact, an agent for Scientology's Guardian's
9 Office.

10 193. The Cult Awareness Network (CAN) was founded in 1978 in the aftermath of the
11 cult mass murder in Jonestown, Guyana. The total destruction of CAN is one of many examples of
12 an organization, rather than a specific individual, that was targeted for speaking out against
13 Scientology.

14 194. CAN became a critical hub of information and support in the pre-internet days for
15 people who were concerned that their family members, friends, and loved ones were being
16 brainwashed by Scientology. People who wanted to learn more about what Scientology was could
17 call one of CAN's 23 chapters and speak to a volunteer who could educate them on the realities of
18 Scientology or 200 other cults.

19 195. CAN officials also spoke out publicly about Scientology's abuses. For example, in
20 1991, Cynthia Kisser of CAN was quoted in TIME Magazine's cover story about Scientology.
21 Kisser said: "Scientology is quite likely the most ruthless, the most classically terroristic, the most
litigious and the most lucrative cult the country has ever seen. No cult extracts more money from
its members."

196. Scientology routinely attacked CAN and referred to it as a "religious hate group."
As part of its operation against CAN, Scientology commanded 50 civilian Scientologists to try and
become members of CAN. When these Scientologists were rejected for membership, they filed
discrimination lawsuits against CAN. The attorney filing these lawsuits on their behalf was
Scientologist Kendrick Moxon, whose law firm primarily handles matters related to Scientology.

197. Moxon also represented, on a pro-bono basis, non-Scientologists who wanted to
sue CAN for non-Scientology related matters.

1 198. These operations achieved their objectives when CAN was forced into bankruptcy
2 as a result of litigation directed and paid for by Scientology.

3 199. As part of the reorganization of CAN in bankruptcy, its assets were auctioned off.
4 This included use of the CAN name, control over its website, and even its phone numbers.

5 200. These assets were won at auction by a Scientologist who promptly turned them
6 over to Scientology.

7 201. In the nascent days of the internet, people were still not aware that Scientology had
8 gained control of CAN's assets. As a result, people would call CAN seeking help on getting their
9 loved ones out of Scientology, but would have no idea that they were receiving advice from a
10 Scientologist.

11 202. In 1991, Time Magazine published an investigation by reporter Richard Behar into
12 Scientology entitled "The Thriving Cult of Greed and Power." The cover story devastated
13 Scientology's public reputation and led David Miscavige to go to war against Time Magazine and
14 Behar personally. For years, Behar was trailed and harassed by Scientology's private investigators.
15 In addition, Scientology illegally obtained copies of his phone records and credit reports.
16 Scientology also spent millions of dollars trying to tarnish Behar's reputation and that of Time
17 Magazine.

18 203. In 1997, investor Bob Minton became a Fair Game target of Scientology after he
19 began funding efforts to expose Scientology's abuses and financially supporting former
20 Scientologists who were whistleblowers. Minton, who was never a Scientologist, became a key
21 focus of David Miscavige. Under Miscavige's command, Scientology got Minton's bank accounts
in Switzerland frozen based on false money laundering charges from the Nigerian government.

 204. After Minton spent \$10 million on efforts to expose Scientology, he finally gave up
after he was left penniless and fled to Ireland.

 205. David Touretzky a research professor in the Computer Science Department at
Carnegie Mellon University, has also been the object of Fair Game. Though he has never been a
member of Scientology, he has been a public critic, particularly of Narconon, a Scientology drug
rehabilitation program. Narconon promotes the idea that drugs reside in the body fat, where they
can be released years later, and promotes the use of saunas for detoxification. OSA directed a
campaign to "get DST removed from his position at CMU and neutralized as an attacker." It
included efforts to gin up a Congressional investigation, cut off Touretzky's federal funding,
circulate letters to Carnegie Mellon faculty and flyers to businesses where Touretzky shopped,

1 activate Carnegie Mellon alumni, field websites critical of Touretzky, and spread false stories in
2 the media, including tales that Dr. Touretzky would be responsible for another Columbine. The
3 goals was also to keep Touretzky "distracted and under attack on the Net by tripling the negative
4 postings that were being done previously."

5 206. Tory Christman, a former Scientologist and former Office of Special Affairs agent,
6 became the focus of several OSA operations in 2000 after she publicly left Scientology. The
7 sophisticated operation Scientology ran against Christman due to her being declared Fair Game
8 was revealed in a leaked March 2006 Office of Special Affairs Order which explained in detail
9 how OSA was to destroy Christman.

10 207. In "find[ing] what they seek to protect and destroy it," OSA reviewed Christman's
11 confidential religious and ethics files and determined that Christman sought to protect her health,
12 reputation, relationships with the media, and job. The goal of the OSA operation was stated: "Tory
13 dismissed as an attacker or totally restrained and muzzled."

14 208. Among the nefarious activities listed in the OSA memo: Have Christman's
15 ex-husband (who remained in Scientology) call and write to news outlets and her employer to
16 smear her as a liar.

17 209. The OSA memo directed that a Scientology private investigator infiltrate the
18 consulting business at which Christman worked with clients under the ruse of becoming a new
19 client. After signing with Christman, the private investigator was to complain to her boss that she
20 was incompetent. The OSA Order also instructed operatives to place negative reviews about
21 Christman on message boards and the Better Business Bureau website. The comments should
include "that [Christman] is a crazy person taking anti-depressants."

22 210. In 2013, a private investigator who had just been arrested by law enforcement in
West Allis, Wisconsin, revealed that he was being paid \$10,000 a week by Scientology to track
David Miscavige's father, Ron Miscavige.

23 211. The senior Miscavige had fled his son's reign at a secretive Scientology base in
Southern California and was living in exile in Wisconsin.

24 212. The private investigator told authorities that while monitoring Ron Miscavige, he
thought Miscavige might be having a heart attack. The investigator called David Miscavige to pass
on this information. The private investigator told authorities that David Miscavige told him that if
he witnessed his father having a heart attack, he was not to interfere and let him die.

213. In 2016 when Ron Miscavige's memoirs were published, Scientology registered hundreds of websites to smear his reputation and even went so far as to have Scientology's top attorney Monique Yingling falsely attack Ron Miscavige in a television interview.

214. These operations, among others, demonstrate a pattern and practice of harassment, defamation, and abuse through hundreds of Scientology orders, carried out since its inception and spanning over seven decades through today, affecting Ms. Remini and others, and likely to endanger others in the future.

V. CAUSES OF ACTION

COUNT I

CIVIL HARASSMENT

215. Plaintiff incorporates and realleges all allegations contained in the foregoing paragraphs as though fully set forth herein.

216. From the moment Plaintiff Remini departed Scientology, she was declared a suppressive person and has been subjected to a series of acts of harassment by Defendants and Defendants' operatives.

217. Defendants' course of conduct includes, but is not limited to, following, surveilling, and stalking Plaintiff, sending Scientology operatives to break into Ms. Remini's gated community, stealing her personal residential mail, vandalizing her mailbox, planting and/or attempting to plant spyware in close proximity to her home, sending harassing correspondence to Plaintiff and to others, including business associates and sponsors regarding Plaintiff, and creating a social media smear campaign against Plaintiff that includes false and malicious accusations made against Ms. Remini, and at times, her family. As Defendants' pattern of conduct was defamatory and conducted with the intent to harass, it was criminal in nature not protected by the veil of religious practice.

218. Plaintiff also experienced scores of incidents of credible threats of violence, placing Plaintiff in fear for her own safety and the safety of her immediate family. These threats of violence could not, and did not, serve any legitimate purpose.

219. Defendants' stalking of Plaintiff constitutes unlawful violence in violation of Section 646.9 of the California Penal Code.

1 220. Defendants' knowing and willful course of conduct directed at Plaintiff has
2 occurred for at least ten years and continues to this day; it has alarmed, annoyed, and harassed her,
3 without any legitimate purpose other than to cause her harm. The conduct is at such a level as to
4 cause a reasonable person to suffer substantial emotional distress as has been suffered by Ms.
Remini.

5 221. Some examples of Defendants' harassment, as described above, include:

- 6 a. Being physically harassed and surveilled by private investigators, private
7 citizens, and OSA members of Scientology at the behest of Defendants;
- 8 b. Defendants directing and coordinating an extensive and decade-long social
9 media campaign against Ms. Remini via hundreds of Scientology-run and
10 directed Twitter accounts and websites by means of false pretenses,
misrepresentations and lies; and
- 11 c. Using social media and other means to send hundreds of letters to Ms.
12 Remini's business associates and advertisers threatening these individuals
13 and entities to cease their affiliation with Ms. Remini based on lies and
misinformation.

14 222. Defendants' willful acts of harassment entitles Plaintiff Remini to an order
15 enjoining Defendants, and their agents, from harassing, intimidating, stalking, threatening,
16 contacting, either directly or indirectly, by mail, social media, correspondence, or otherwise, or
17 coming within a specified distance of, or disturbing the peace of, Plaintiff.

18 223. Further, an award of compensatory and punitive damages to Plaintiff from
19 Defendants is justified.

20 WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against
21 Defendants for civil harassment and award such other and further relief as it deems appropriate.

COUNT II

STALKING - CALIFORNIA CODE § 1708.7

22 224. Plaintiff incorporates and realleges all allegations contained in the foregoing
23 paragraphs as though fully set forth herein.

24 225. Defendants engaged in a pattern of conduct from 2013 and continuing to the
25 present, with the intent to follow, alarm, place under surveillance, stalk, and harass the Plaintiff.

226. This continuous course of conduct in which Defendants engaged against Plaintiff includes being physically harassed and surveilled by private investigators (through their lawyers), private citizens, and OSA members of Scientology at the behest of Defendants as described herein. Defendants have also engaged in stalking of Plaintiff by posting threatening information to various websites and via social media on a continuing basis.

227. As a result of Defendants' continuing pattern of harassing conduct over the last ten years and through present day, Plaintiff reasonably feared for her safety and the safety of her family.

228. As a result of Defendants' continuing pattern of harassing conduct over the last ten years and through present day, Plaintiff reasonably suffered severe emotional distress.

229. Defendants, as part of their pattern of conduct alleged herein, made credible threats to the Plaintiff with the intent to place the Plaintiff in reasonable fear for her safety, despite the Plaintiff on multiple occasions clearly demanding that Defendants cease and abate their pattern of conduct.

230. As such, an award of compensatory and punitive damages to Plaintiff from Defendants is justified.

WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against Defendants for civil stalking and award such other and further relief as it deems appropriate.

COUNT III

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

231. Plaintiff incorporates and realleges all allegations contained in the foregoing paragraphs as though fully set forth herein.

232. Since 2013, Defendants have engaged in a continuing course of conduct towards Ms. Remini that constitutes extreme and outrageous conduct.

233. Defendants intended their extreme and outrageous conduct to cause the distress and suffering of Plaintiff or knew that such conduct would cause Plaintiff distress and suffering.

234. As a result of the continuing course of extreme and outrageous conduct of Defendants, Plaintiff has suffered severe emotional distress, mental anguish, and has suffered damages.

235. As such, an award of compensatory and punitive damages to Plaintiff from Defendants is justified.

1 WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against
2 Defendants for intentional infliction of emotional distress and award such other and further relief
3 as it deems appropriate.

4 **COUNT IV**
TORTIOUS INTERFERENCE WITH CONTRACTAL RELATIONSHIP

5 236. Plaintiff incorporates and realleges all allegations contained in the foregoing
6 paragraphs as though fully set forth herein.

7 237. Plaintiff had a binding and valid contract with iHeartMedia.

8 238. Plaintiff had a binding and valid contract with AudioBoom.

9 239. Defendants knew about the contractual relationship between Ms. Remini and
10 iHeartMedia and Audioboom.

11 240. Defendants intentionally interfered with Ms. Remini's contractual relationship with
12 iHeartMedia, without any justification, through actions including but not limited to: writing false
13 and disparaging accusations about Ms. Remini and her podcast on various social media websites
14 and twitter accounts owned, operated and/or controlled by Defendants and Defendants' operatives;
15 sending disparaging letters about Ms. Remini to iHeartMedia's executive vice president and COO,
16 producer, podcast audio editor, and advertisers; and harassing iHeartMedia's podcast producers
17 until they decided to end its contractual relationship with Ms. Remini on March 7, 2022.

18 241. Defendants intentionally interfered with Ms. Remini's contractual relationship with
19 AudioBoom, without any justification, by engaging in conduct that included, but is not limited to
20 sending disparaging letters about Ms. Remini and her podcast to the CEO of AudioBoom as well
21 as AudioBoom's advertisers and investors, encouraging AudioBoom to end their relationship with
Ms. Remini until AudioBoom did end its contractual relationship with Ms. Remini on August 30,
2022. Engaging in the aforesaid conduct, Defendants intended to disrupt the contractual
relationships with Ms. Remini and AudioBoom and iHeartMedia or knew that the disruption of
these relationships was substantially certain to occur.

22 242. As a direct and proximate result of Defendants' tortious interference with Ms.
23 Remini's contractual relations, Ms. Remini's contractual relationships with AudioBoom and
24 iHeartMedia were indeed disrupted.

25 243. As a direct and proximate result of Defendants' tortious interference with Ms.
26 Remini's contractual relations, Ms. Remini suffered economic harm, including without limitation,

1 the loss of revenues and fees Ms. Remini would have derived had iHeartMedia and Audioboom
2 maintained a contractual relationship with Ms. Remini.

244. Accordingly, Ms. Remini has suffered damage as a result of Defendants' tortious
3 interference with Ms. Remini's contractual relationship with iHeartMedia and AudioBoom.

245. As such, an award of compensatory and punitive damages to Plaintiff from
4 Defendants is justified.

WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against
5 Defendants for tortious interference with a contractual relationship and award such other and
6 further relief as it deems appropriate.

7 **COUNT V**

8 **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**

246. Plaintiff incorporates and realleges all allegations contained in the foregoing
9 paragraphs as though fully set forth herein.

247. Ms. Remini and AudioBoom were in an economic relationship that, had this
10 relationship continued, likely would have resulted in an economic benefit to Ms. Remini.

248. Ms. Remini and iHeartMedia were in an economic relationship that, had this
11 relationship continued, likely would have resulted in an economic benefit to Ms. Remini.

249. Ms. Remini and Game Show Network were in an economic relationship that, if this
12 relationship continues, likely will result in an economic benefit to Ms. Remini.

250. Ms. Remini and Vice News were in an economic relationship that probably would
13 have resulted in an economic benefit to Ms. Remini.

251. Ms. Remini's business relationships with AudioBoom, iHeartMedia, Vice News,
14 and the Game Show Network contained the probability of future economic benefits to Remini in
15 the form of revenues.

252. Defendants knew of the economic relationship between Ms. Remini and
16 AudioBoom, iHeartMedia, the Game Show Network, and Vice News and intentionally took
17 outward measures to destroy these relationships.

253. Defendants intentionally interfered with Ms. Remini's economic relationship with
18 AudioBoom by engaging in conduct that included sending disparaging letters about Ms. Remini
19 and her podcast to the CEO of AudioBoom as well as AudioBoom's advertisers and investors,
20 encouraging AudioBoom to end their relationship with Ms. Remini.

1 254. Defendants intentionally interfered with Ms. Remini's economic relationship with
2 iHeartMedia by engaging in conduct that included: writing false and disparaging accusations about
3 Ms. Remini and her podcast on various social media websites and twitter accounts owned,
4 operated and/or controlled by Defendants and Defendants' operatives; sending disparaging letters
5 about Ms. Remini to iHeartMedia's executive vice president and COO, producer, podcast audio
6 editor, and advertisers; and harassing iHeartMedia's podcast producers until they decided to end
7 their business relationship with Ms. Remini.

8 255. Defendants intentionally interfered with Ms. Remini's economic relationship with
9 the Game Show Network by engaging in conduct that included: sending disparaging and false
10 open letters to the Game Show Network claiming that Ms. Remini is an "unhinged bigot," a "rape
11 apologist" and someone who believes "it's not a big deal to sexually abuse women;" sending
12 disparaging letters to the Game Show Network's advertisers, encouraging them to pull their
13 support from the Game Show Network for airing Ms. Remini's show; and sending Defendants'
14 operatives to the Game Show Network with false claims that they were investigating allegations of
15 Ms. Remini's alleged abusive behavior in the workplace. Upon information and belief, Defendants
16 intentionally interfered with Ms. Remini's economic relationship with Vice News by harassing
17 employees and directors at Vice News and encouraging them not to work with Ms. Remini.

18 256. By engaging in the aforesaid conduct, and based on the policies and practices under
19 the Fair Game banner, Defendants intended to disrupt the economic relationships with Ms. Remini
20 and AudioBoom, iHeartMedia, the Game Show Network, and Vice News, and ID/PR or knew that
21 the disruption of these relationships was substantially certain to occur.

 257. As a direct and proximate result of Defendants' malicious and intentional actions,
Ms. Remini's economic relationships with AudioBoom, iHeartMedia, the Game Show Network
and Vice News was indeed disrupted.

 258. As a direct and proximate result of Defendants' malicious and intentional actions,
Ms. Remini suffered economic harm, including without limitation the loss of revenues and fees
Ms. Remini would have derived from these economic relationships.

 259. In addition to AudioBoom, iHeartMedia, Vice News and the Game Show Network,
Defendants have intentionally interfered with and thwarted an untold number of additional
business opportunities by virtue of their attack campaign against Ms. Remini, which includes the

1 incessant harassment of any and all individuals and business entities who align themselves with or
2 seek to do business with Ms. Remini.

260. Accordingly, Ms. Remini has suffered damage as a result of Defendants'
3 intentional interference with Ms. Remini's prospective economic relations.

261. As such, an award of compensatory and punitive damages to Plaintiff from
4 Defendants is justified.

5 WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against
6 Defendants for intentional interference with prospective economic advantage and award such
other and further relief as it deems appropriate.

7 **COUNT VI**

8 **DEFAMATION & DEFAMATION *PER SE***

9 262. Plaintiffs incorporate and reallege all allegations contained in the foregoing
10 paragraphs as though fully set forth herein.

263. Since 2013, and continuing to this day, Defendants knowingly and willingly
11 published, or caused to be published, false and defamatory statements about Ms. Remini. These
false and defamatory statements include, but are not limited to:

12 a. Statements accusing Ms. Remini of inciting hate crimes:

13 i. A January 31, 2023 article on standleague.org, a website owned, operated
and/or controlled by Defendants, which claims that Ms. Remini's "hate
speech has resulted in violent and deadly attacks on innocents[.]"

14 ii. An August 4, 2022 article on standleague.org which fraudulently claims
15 that: "In 2019, a man incited by Leah Remini's hate speech murdered a
24-year-old Scientologist, Aaron Yeh, outside the Australasian headquarters
16 of the Church."

17 iii. An April 13, 2023 tweet from Hate Monitor, a twitter account owned,
operated, and/or controlled by Defendants that falsely claims that Leah
18 Remini "is responsible for hundreds of threats and multiple acts of violent
hate crime against Scientologists."

19 i. A tweet dated April 18, 2023 from Hate Monitor, a twitter account owned,
20 operated, and/or controlled by Defendants that falsely stated "On January 3,
2019, a man incited by Leah Remini's hate speech murdered a 24-year-old
21

1 Scientologist. @LeahRemini has blood on her hands.” The tweet then refers
2 readers to Scientology-run standleague.org.

3 iv. An undated article on leahreminithefacts.org, a website owned, operated
4 and/or controlled by Defendants which falsely alleges: “Remini's series
5 generated unprecedented waves of hate and threats against Scientologists,
6 the Church and its leadership in the hashtag name of #LeahRemini and/or
7 her TV show and its incendiary bigotry, including threats of bombings,
8 arson, assassinations and mass murder.”

9 b. Statements on social media that Ms. Remini supports rapists:

10 i. In March of 2023 alone, twitter accounts owned, operated and/or controlled
11 by Defendants have posted over 247 false and fraudulent photoshopped
12 images of Ms. Remini wearing apparel that says, “I love rapists.”

13 ii. A January 29, 2023 statement on standleague.org, a website controlled
14 and operated by Defendants and Defendants’ operatives, that fraudulently
15 claims that Ms. Remini is a “rape apologist” and “obviously agrees with the
16 actions of these men [accused of rape] or feels that ‘it’s not a big deal’ to
17 sexually abuse women[.]”

18 iii. An April 10, 2023 tweet from Hate Monitor, a twitter account owned,
19 operated, and/or controlled by Defendants that falsely claims that
20 “@LeahRemini is a bigot who inspires violent hate crimes and defends
21 rapists.”

 c. Statements on social media and Defendant-run websites claiming that Ms. Remini
 is a religious bigot who has inspired praise of Hitler:

 i. A February 2, 2022 article on standleague.org entitled “As the World
 Remembers the Holocaust, Bigot Leah Remini Inspires Praise of Hitler.”

 ii. A January 29, 2023 statement on standleague.org that maliciously and
 fraudulently claims that Ms. Remini is “a vicious, lying, narcissistic,
 deranged, demented and dangerous bigot.”

 d. That Ms. Remini had her 18-year-old daughter involuntarily committed to a
 psychiatric facility, including:

 i. A March 9, 2023 statement made on a Twitter account operated by a
 Scientology operative, at the behest of Defendants, that states: “I wonder

1 where Sofia, @leahremini daughter is? Last time she was in NY and came
2 back to LA and Leah sent her to a psych and then back to NY.”

3 264. These false and defamatory statements were published on various social media, and
4 in a seemingly unending stream continue to be released and/or republished on other social media,
5 for public consumption as well as to third parties with whom Ms. Remini has or had business
6 relationships. Indeed, Defendants’ defamatory statements are continuously distributed via so many
7 social media outlets, many of them with intentionally concealed identities, it would be impossible
8 for her to track each one.

9 265. Defendants published these false and defamatory statements to third parties with
10 actual knowledge that the statements were false or with reckless disregard for whether these
11 statements were false, as part of Scientology’s campaign to destroy Ms. Remini’s personal and
12 professional life.

13 266. Defendants knew that publishing the statements about Ms. Remini on the internet
14 would have a damaging impact on Plaintiff’s credibility and reputation.

15 267. These defamatory statements were not name calling or rhetorical hyperbole but
16 constitute specific acts and factual allegations that are actionable.

17 268. These defamatory statements falsely associated and continue to falsely associate
18 Ms. Remini with things viewed as abhorrent in the community.

19 269. Defendants’ decade-long crusade of abuses and attacks against Ms. Remini, which
20 continues to present day and is expected to continue into the future without judicial action,
21 including the defamatory statements made by Defendants or Defendants’ operatives, has subjected
Ms. Remini to public contempt, ridicule, and disgrace.

22 270. The defamatory statements made by Defendants or Defendants’ operatives have
also injured Ms. Remini in her profession as an actress and businesswoman and have caused in the
past and, upon information and belief, continue to cause her to lose business relationships and
business opportunities.

23 271. The publication of such defamatory statements at the behest of Defendants has in
fact caused damages to Ms. Remini resulting in loss of revenue and lost business opportunities and
is expected to cause her to lose such revenue and opportunities in the future.

WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against
Defendants for defamation and award such other and further relief as it deems appropriate.

COUNT VII

1 **DEFAMATION BY IMPLICATION**

2 272. Plaintiffs incorporate and reallege all allegations contained in the foregoing
3 paragraphs as though fully set forth herein.

4 273. Since 2013, and continuing to this day, Defendants knowingly and willingly
5 published, or caused to be published, various statements about Ms. Remini that are not true or
6 substantially true and which could reasonably be construed as defamatory. These false statements
7 include but are not limited to:

8 a. Statements accusing Ms. Remini of inciting hate crimes:

- 9 i. A January 31, 2023 article on standleague.org, a website owned, operated
10 and/or controlled by Defendants, which claims that Ms. Remini's "hate
11 speech has resulted in violent and deadly attacks on innocents[.]"
- 12 ii. An August 4, 2022 article on standleague.org which fraudulently claims
13 that: "In 2019, a man incited by Leah Remini's hate speech murdered a
14 24-year-old Scientologist, Aaron Yeh, outside the Australasian
15 headquarters of the Church."
- 16 iii. An April 13, 2023 tweet from Hate Monitor, a twitter account owned,
17 operated, and/or controlled by Defendants that falsely claims that Leah
18 Remini "is responsible for hundreds of threats and multiple acts of violent
19 hate crime against Scientologists."
- 20 iv. A tweet dated April 18, 2023 from Hate Monitor, a twitter account owned,
21 operated, and/or controlled by Defendants that falsely stated "On January
3, 2019, a man incited by Leah Remini's hate speech murdered a
24-year-old Scientologist. @LeahRemini has blood on her hands." The
tweet then refers readers to Scientology-run standleague.org.
- v. An undated article on leahreminithefacts.org, a website owned, operated
and/or controlled by Defendants which falsely alleges: "Remini's series
generated unprecedented waves of hate and threats against Scientologists,
the Church and its leadership in the hashtag name of #LeahRemini and/or
her TV show and its incendiary bigotry, including threats of bombings,
arson, assassinations and mass murder."

b. Statements on social media that Ms. Remini supports rapists:

- 1 i. In March of 2023 alone, twitter accounts owned, operated and/or
2 controlled by Defendants have posted over 247 false and fraudulent
3 photoshopped images of Ms. Remini wearing apparel that says, “I love
4 rapists.”
- 5 ii. A January 29, 2023 statement on standleague.org, a website controlled
6 and operated by Defendants and Defendants’ operatives, that fraudulently
7 claims that Ms. Remini is a “rape apologist” and “obviously agrees with
8 the actions of these men [accused of rape] or feels that ‘it’s not a big deal’
9 to sexually abuse women[.]””
- 10 iii. An April 10, 2023 tweet from Hate Monitor, a twitter account owned,
11 operated, and/or controlled by Defendants that falsely claims that
12 “@LeahRemini is a bigot who inspires violent hate crimes and defends
13 rapists.”
- 14 c. Statements on social media and Defendant-run websites claiming that Ms. Remini
15 is a religious bigot who has inspired praise of Hitler:
- 16 i. A February 2, 2022 article on standleague.org entitled “As the World
17 Remembers the Holocaust, Bigot Leah Remini Inspires Praise of Hitler.”
- 18 ii. A January 29, 2023 statement on standleague.org that maliciously and
19 fraudulently claims that Ms. Remini is “a vicious, lying, narcissistic,
20 deranged, demented and dangerous bigot.”
- 21 d. That Ms. Remini had her 18-year-old daughter involuntarily committed to a
psychiatric facility, including:
- i. A March 9, 2023 statement made on a Twitter account operated by a
Scientology operative, at the behest of Defendants, that states: “I wonder
where Sofia, @leahremini daughter is? Last time she was in NY and came
back to LA and Leah sent her to a psych and then back to NY.”

274. The above statements were published on social media for public consumption and have created the implications that Ms. Remini is responsible for inciting murder and other hate crimes, that she “loves” rapists and supports sexual abuse, that she is abusive to her daughter, and that she is a Holocaust supporter and religious bigot.

275. These challenged statements reasonably create implications that are not true or substantially true.

276. The implications drawn from the challenged statements convey the assertions of objective facts and not opinions.

277. Plaintiffs' interpretation of Defendants' statements is reasonable and has created an overall impression of Ms. Remini in the manners described.

278. These challenged statements could reasonably be deemed as defamatory and such statements have injured Ms. Remini's personal and professional reputation as detailed herein.

279. These defamatory statements and implications falsely associated and continue to falsely associate Ms. Remini with things viewed as abhorrent in the community.

280. Defendants' decade-long crusade of abuses and attacks against Ms. Remini, including the defamatory statements made by Defendants or Defendants' operatives, has subjected Ms. Remini to public contempt, ridicule, and disgrace.

281. The defamatory statements and implications made by Defendants or Defendants' operatives have also injured Ms. Remini in her profession as an actress and businesswoman and have caused her to lose business relationships and business opportunities and is expected to cause her to lose such relationships and opportunities in the future.

WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against Defendants for defamation by implication and award such other and further relief as it deems appropriate.

COUNT VIII
FALSE LIGHT

282. Plaintiffs incorporate and reallege all allegations contained in the foregoing paragraphs as though fully set forth herein.

283. Since 2013, and continuing to this day, Defendants knowingly and willingly published, or caused to be published statements about Ms. Remini, as set forth herein, on social media for public consumption.

284. Such statements and negative publicity have placed Ms. Remini before the public in a false light that is and would be highly offensive to a reasonable person.

285. Defendants published these false statements to third parties with actual knowledge that the statements were false or with reckless disregard for whether these statements were false, as part of Scientology's campaign to destroy Ms. Remini's personal and professional life.

286. Defendants knew that publishing the statements about Ms. Remini on the internet would have a damaging impact on Plaintiff's credibility and reputation.

287. These false statements that placed Ms. Remini in a false light before the public were not name calling or rhetorical hyperbole but constitute specific acts and factual allegations that are actionable.

288. These false statements falsely associated Ms. Remini with things viewed as abhorrent in the community.

289. Defendants' decade long crusade of abuses and attacks against Ms. Remini, including the false statements made by Defendants or Defendants' operatives, has subjected Ms. Remini to public contempt, ridicule, and disgrace.

290. The false statements made by Defendants or Defendants' operatives have also injured Ms. Remini in her profession as an actress and businesswoman and have caused her to lose business relationships and business opportunities.

291. The publication of such false statements at the behest of Defendants has in fact caused damages to Ms. Remini resulting in loss of revenue and lost business opportunities.

WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a judgment against Defendants for defamation and award such other and further relief as it deems appropriate.

COUNT IX

DECLARATORY JUDGMENT- CALIFORNIA CODE CIVIL PROCEDURE § 1060

292. Plaintiffs incorporate and reallege all allegations contained in the foregoing paragraphs as though fully set forth herein.

293. Defendants maintain and implement a policy of abuse and attack against former members who speak out against Scientology.

294. Upon departure from Scientology, an individual should not be stalked, harassed, targeted, or made to fear for their life or livelihood.

295. Religious freedoms do not permit criminal or tortious behavior. Nor may so-called religious doctrine or directives shelter the commission of crimes or torts against former members who exercise their rights to disassociate from or criticize an organization to which they once belonged.

1 296. The abuse leveled at Ms. Remini is part of a broader policy and practice of
2 intimidation. Ms. Remini is just one of thousands of former-Scientologists who Defendants have
3 terrorized as part of their systemic practice of Fair Game.

4 297. The implementation of the Suppressive Persons policy as it pertains to Ms. Remini
5 or any other former member or perceived critic of Scientology is unlawful.

6 298. Therefore, Plaintiff Remini seeks a judicial declaration that the practice of
7 Suppressive Persons operations are unlawful and should be ceased immediately.

8 299. Plaintiff Remini is in doubt as to her rights and privileges with respect to the crimes
9 and torts being committed against her by Defendants and is entitled to have such doubt removed.

10 300. There is a bona fide, actual, present, and practical need for a declaration of the
11 rights of Ms. Remini with respect to the practice of attacks against Suppressive Persons, as
12 described above.

13 WHEREFORE, Plaintiff, LEAH REMINI, requests that the Court enter a declaratory
14 judgment that Defendants be prohibited from implementing the Suppressive Persons attack policy
15 so that she is free from tortious and criminal conduct and award such other and further relief as it
16 deems appropriate.

17 **PUNITIVE DAMAGES SOUGHT AGAINST DEFENDANTS & RESERVATION**
18 **OF RIGHTS**

19 Defendants are, based on information and belief, religious corporations, organized under
20 the laws of California, and therefore, are afforded the protection of Code of Civil Procedure
21 §425.14. Upon such time as appropriate, the Plaintiff expressly reserves the right to file a Motion
to Amend the instant Complaint in order to allege facts sufficient to constitute punitive damages
against Defendants in accordance with Civil Code §3294.

PRAYER FOR RELIEF

1. Plaintiff demands a trial by jury of all issues in this action that are triable;
2. For a declaratory judgment that Scientology has violated the law;
3. For injunctive relief requiring Scientology to cease and desist its harassment, defamation, and other unlawful conduct and striking all Suppressive Person and Fair Game policies, directives and OSA Network Orders;
4. For compensatory damages in an amount to be proven at trial;

1 5. Damages for the disruption of contractual relationships and lost business
2 opportunities in an amount to be proven at trial;

3 6. Punitive damages and damages for severe emotional and mental distress in an
4 amount to be proven at trial;

5 7. Liquidated damages for any future violations as to Ms. Remini; and

6 8. For such other relief as is just and proper

7 Dated: August 1, 2023

8 Respectfully submitted,
9 Seth Lehrman, Esq.

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Deadline