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August 16, 2012

VIA E-MAIL ONLY

Mr. Graydon Carter
Editor, Vanity Fair Magazine
4 Times Square, 22nd Floor
New York, New York, 10036

Re: Mr. David Miscavige

Dear Mr. Carter:

We represent Mr. David Miscavige, Chairman of the Board of Religious Technology Center and the ecclesiastical leader of the Scientology religion.

We are writing regarding your, your editor's and reporter's shoddy journalism, religious bigotry and potential legal liability arising out of *Vanity Fair's* upcoming story about the Tom Cruise divorce. Significantly, while Maureen Orth was preparing her story, *Vanity Fair* ignored its staff and contributors who have firsthand knowledge of Mr. Cruise and of Mr. Miscavige and who would burden her story with the truth.

We have further been informed that you are directing this story personally, that you have intentionally kept your LA Office out of the loop and refused any input by *Vanity Fair* employees with personal knowledge of the Church and Mr. Miscavige. And all of this to intentionally make the Church unaware that a story was even being written about them, until your reporter had written it in full. Her request for an "interview" of Mr. Miscavige was a disingenuous sham, since she couldn't possibly have thought that an "Oh, by the way" phone call to the Church's Public Affairs office requesting an interview with the ecclesiastical leader of the religion could possibly be accommodated. If she were serious, she would have done at least a molecule of research in seeing that Mr. Miscavige travels across the country and around the world almost non-stop, unlike the anti-Scientologist apostate sources who form the basis of her *already-written story* and who are available on a moment's notice at the press of "send" on any anti-Scientology hate-site blog. Is it usual for you to take over the editorial direction of *Vanity Fair* articles or is that reserved for hatchet-jobs of minority religions and its members?

I.
The Ostensible Story

We understand that on August 10, 2012, Ms. Orth left a voice-mail for the Church of Scientology. Her voice-mail stated that she was writing a story about the Tom Cruise divorce – an event that has already been extensively covered by virtually every media company in the world. Her voice-mail also stated that her story would include the relationship between Mr. Cruise and Mr. Miscavige – which has also been extensively covered in the media. Ms. Orth’s description of her story shows that she is merely repeating celebrity gossip, previously published by others. It appears that Ms. Orth is going to report her “revelation” that Mr. Miscavige is a close friend of Mr. Cruise – which, of course, is not “news;” they have been close friends for over two decades and this fact has been widely reported in the media.

Subsequently, *Vanity Fair* sent a list of 31 questions (and later a 32nd question) to the Church about the article – questions that evidence the tabloid nature of the article, Ms. Orth’s reckless disregard of the truth and her religious bigotry. In addition, she copies the style of her ex-Scientologist sources by using banal questions that assume a “frat house” mentality to disparage Mr. Miscavige and the Scientology religion.

For example, *Vanity Fair*, which once had a reputation for journalistic integrity, is now reduced to asking the leader of a religion in its 32nd, and final question: “Would David Miscavige comment on the notion that he has been a kind of third wheel in Tom Cruise’s relationships and marriages?”

Mr. Miscavige is the ecclesiastical leader of a worldwide religion; a man of impeccable character who is dedicated to his faith and to the service of its parishioners. He respects the institution of marriage and those who enter into it. Not only is this highly offensive and grossly inappropriate question lifted from Andrew Morton’s 2008 unauthorized biography of Tom Cruise, but if Ms. Orth had done any research, she would know that Mr. Miscavige’s vocation requires him to travel extensively throughout the world and he is rarely even in the same cities as the celebrities with whom she suggests he spends virtually all of his time. Ms. Orth’s implications are demonstrably false. If she had considered for a minute the respective travel and work demands placed on both Mr. Miscavige and Mr. Cruise, she would have dismissed outright this “third wheel notion” concocted in Mr. Morton’s book.

Mr. Cruise is a movie star; his whereabouts are chronicled constantly in the media. In the last three years, and according to media reports, Mr. Cruise was shooting five movies in locations that include Boston, Spain, Budapest, Dubai, Miami, Pittsburgh, Baton Rouge, New York and Iceland.

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At the same time, Mr. Miscavige has a full schedule every week of every year leading the fastest growing religion to emerge in the 20th Century. By way of just one example, Mr. Miscavige opened numerous new Churches during those same years:

- 1) Church of Scientology of Malmo, Sweden
- 2) Church of Scientology of Dallas, Texas
- 3) Church of Scientology of Nashville, Tennessee
- 4) Church of Scientology of Rome, Italy
- 5) Church of Scientology of Washington, D.C.
- 6) The Brussels, Belgium Branch of the Churches of Scientology for Europe
- 7) Church of Scientology of Quebec, Canada
- 8) Church of Scientology of Las Vegas, Nevada
- 9) Church of Scientology of Los Angeles, California
- 10) Church of Scientology of Mexico City, Mexico
- 11) Church of Scientology of Pasadena, California
- 12) Church of Scientology of Seattle, Washington
- 13) Church of Scientology of Melbourne, Australia
- 14) Church of Scientology of Moscow, Russia
- 15) Church of Scientology of Tampa, Florida
- 16) Church of Scientology of St. Paul, Minnesota
- 17) Church of Scientology of Inglewood, California
- 18) Church of Scientology of Hamburg, Germany
- 19) Church of Scientology of Sacramento, California
- 20) Church of Scientology of Greater Cincinnati, located in Florence, Kentucky
- 21) Church of Scientology of Orange County, California
- 22) Church of Scientology of Stevens Creek, located in San Jose, California
- 23) Church of Scientology of Denver, Colorado
- 24) Church of Scientology of Phoenix, Arizona
- 25) Church of Scientology of Buffalo, New York
- 26) Church of Scientology of Los Gatos, California

The information on these Church openings, attended by thousands, is readily available, including photographs of such, on the Church's official website at www.scientology.org.

Mr. Miscavige additionally opened the Church's newly restored historic religious retreat, the *Fort Harrison*, in Clearwater, Florida and will soon open the Church's new spiritual Mecca in Clearwater. www.scientology.org/david-miscavige/building-a-bridge-for-the-future-of-the-scientology-religion.html. Mr. Miscavige is further scheduled to open another new Church overseas this coming week and five more are scheduled to open before the end of the year. For further information, see www.scientology.org/churches/churches-of-scientology.html.

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In just the past few years Mr. Miscavige has also personally led the Church's 25-year program to recover all of its Founder's writings and lectures on Scientology and to make all of the religion's Scripture available to its parishioners. www.scientology.org/david-miscavige/renaissance-for-scientology.html. Mr. Miscavige also saw to the establishment of the Church's all-digital religious publishing facilities, Bridge Publications in Los Angeles and New Era Publications in Copenhagen, Denmark. In 2011 he oversaw the establishment of a dissemination center for the production of materials used in the Church's humanitarian programs. www.scientology.org/churches/bringing-scientology-world.html. He also guided the Church's recent acquisition of a full High Definition television broadcasting facility, previously owned by KCET, as part of the Church's expanded media plan to establish a religious television broadcasting facility. Highlights of Mr. Miscavige's myriad other activities on behalf of the religion he spearheads may be found at www.scientology.org/david-miscavige.html.

As *Vanity Fair* is already well aware, Mr. Miscavige's schedule also includes presiding over no less than 12 religious events held each year (also attended by thousands and replayed internationally) in Los Angeles, Florida, the United Kingdom and the Church's religious retreat in the Caribbean.

Mr. Miscavige is the leader of a dynamic global religion expanding across five continents. His duties are herculean and accomplishments monumental. He is not a "third wheel" to anything or *anyone*. Ms. Orth is apparently willing to besmirch Mr. Miscavige's reputation based on unreliable sources to sell magazines, while ignoring the decades of his tireless service to advance the Scientology religion as well as its international humanitarian programs for all mankind, while also ignoring reliable sources available at her discretion, e.g., ***Vanity Fair* employees who know Mr. Miscavige personally, including a *Vanity Fair* employee who works for Mr. Miscavige in a professional capacity.** Indeed, this *Vanity Fair* staffer has seen Mr. Miscavige in action from Los Angeles to the United Kingdom and points in between, in front of and behind the scenes, and dozens of occasions in the past 8 years. In that regard, this *Vanity Fair* employee is far more aware of and knowledgeable about the Church's programs and expansion than any of Ms. Orth's apostate sources. Similarly, he is also an individual who is knowledgeable of Mr. Miscavige's stature in the Church, his relationship to parishioners and the general public and, in summary, his *character-which* bears no resemblance to the offensive tabloid allegations Ms. Orth so irresponsibly forwards as serious "questions." Has Ms. Orth spoken to this individual? Have you? Were you even aware of his relationship to Mr. Miscavige? And if not, what does that say about the "investigation" by Ms. Orth? If rabid anti-Scientologist/anti-David Miscavige apostates long ago kicked out of the Church are considered "sources" of information, then certainly a respected and objective *Vanity Fair* employee with no axe to grind and who has seen Mr. Miscavige at Church convocations and celebrations year after year in the present time is a far better source of information. And if Ms. Orth never considered this or, worse, was unaware of the relationship, then it means she left to

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the grassy-knoll of the internet for "information" while ignoring truly objective sources of information in her own *offices-current information, in contrast to the stale and ever-changing fiction manufactured by bitter apostates who haven't a clue.*

II.

The Scurrilous Allegations Having Nothing to do with the Ostensible Story

Based on Ms. Orth's questions, it appears *Vanity Fair* intends to publish the false and contemptible allegation that Mr. Miscavige committed the sacrilege of using Scientology auditing sessions to manipulate parishioners. These alleged events never occurred – and, no credible person has ever said that they did. There are no authentic contemporaneous documents evidencing such events (because such events never occurred).

To be absolutely clear, Mr. Miscavige never videoed auditing sessions, never saw videos of auditing sessions (since there are no videos), never read session reports aloud (since there are no such reports), let alone ever used such information to “manipulate” anyone.

Do you realize how blatantly bigoted these questions are? Ms. Orth shows no sensitivity to Scientology's religious beliefs as she apparently hasn't a clue what those beliefs are. Scientology auditing is the most sacrosanct practice of the Scientology religion and the confidences of parishioners given in auditing are inviolate. Yet the very tenor of Ms. Orth's questions concerning such matters, on the order of “By the way, do you take sugar in your coffee?” evidences her total ignorance and lack of respect for the beliefs of Scientologists. The allegations she forwards are akin to asking the Pope if he threw poison in the wine before failing to bless the Holy Communion during the Easter service. Your apostate sources know that is the nature of what they are insinuating and Ms. Orth, who hasn't the vaguest clue about the practice of Scientology, has been duped into forwarding their anti-Scientology agenda. Considering the subject of her questions, the ecclesiastical leader of the Scientology religion, *Vanity Fair's* lack of even a “Scientology 101” education is ethically and journalistically irresponsible. Especially since that information is readily available on the Church's website. Instead, Ms. Orth appears to have only gleaned her information from fringe hate sites and their webmasters. If she were writing a story about a Sikh religious leader, would she first latch onto the sites of white supremacists, then interview their most virulent and violent members and follow it up with mere “fact check” questions to the Sikhs themselves? At the eleventh hour? And refuse to give the names of her white supremacist sources? The scenario is no different here. Scientology is a new religion and its beliefs not as well known as those of more ancient history. That does not excuse you or Ms. Orth for being ignorant. Rather, it demands you be even more sensitive to finding out what the true beliefs are of Scientology-which can only be told by the religion itself. Just because you don't *think* you are bigoted doesn't mean you aren't. Bigotry and ignorance go hand in hand and you are *definitely* and *wilfully* ignorant of the actual beliefs of Scientology and the activities of its Churches.

The people who manufactured these calumnies have a sordid history of committing perjury, destruction of documents and obstruction of justice (see Section III, below). The implication that Mr. Miscavige would violate the Scripture is defamatory. It also shows the depth of the religious intolerance and insensitivity with which your writer is approaching this article. What you are asking cuts to the core of religious belief and the responsibilities of ministering to parishioners, and thus his functions and duties as the head of the religion. Not only did these actions not occur, but had they occurred at any Church, Mr. Miscavige would have been the one rectifying and defrocking the minister concerned. Mr. Miscavige is implicitly trusted by Scientologists throughout the world.

No responsible journalist would publish that the leader of a religion betrayed his faith where, as here, there is no bona fide corroborating evidence of such an explosive charge. Under these circumstances, any publication of such allegations by *Vanity Fair* to its millions of readers is irresponsible journalism, religious bigotry and defamation per se.

Reporting that such sensational accusations have been made, even if accompanied by the fact that they were asserted by unreliable sources, with no corroborating evidence, under circumstances evidencing that there is no basis in fact for the accusations, is irresponsible journalism. Readers tend to remember the accusations more than they remember their refutation.

III. A Rogues' Gallery of Unreliable "Sources"

Earlier stories that made the same specious allegations Ms. Orth appears bent on regurgitating were based on apostate "sources" who have a history of manufacturing ever more sensational allegations about Scientology and Mr. Miscavige to the media, looking for publicity, revenge and personal gain (some even being paid for making such allegations).

Ms. Orth has admitted she spoke with Marty Rathbun and Mike Rinder, a dynamic duo of lunatic venom and untrustworthy bile. The substance of her questions also evidences, whether she spoke to them or not, that Ms. Orth is also relying on information from Tom De Vocht (who admits he is a compulsive liar and has suborned perjury in legal proceedings), Marc Headley (who has admitted in legal proceedings that he has sold stories for thousands of dollars to tabloid publications including *News of the World*) and Amy Scobee (who was expelled from the Church for having sexual relations with a parishioner she was ministering). At least three of these individuals have also self-published their "memoirs" and are virtually for-hire of any publications wanting a scandalous story on Scientology, whereupon they never fail to give a plug for their "books."

There are only three possibilities regarding *Vanity Fair's* reliance on these discredited sources: (a) Ms. Orth has told *Vanity Fair* that she uncovered Messrs. Rathbun, Rinder, Headley, DeVocht's and Scobee's unsavory past, but *Vanity Fair* does not care about their complete lack

of credibility; (b) Ms. Orth has uncovered their past, but hid it from *Vanity Fair* because she shares their religious bigotry; or (c) Ms. Orth's reporting is incompetent. We hope that it will not take a jury to find out which possibility proves true.

IV. The Other Questions

Further questions range from the obscene to absolutely ludicrous and for which there could be no basis in fact except the lowest tabloid standard of listening to uninformed gossip, finding a willing "corroborator" who profits by providing "corroboration" (including more sales of the source's "book") and calling it fact. Mr. Miscavige has never had any involvement with the hiring of Mr. Cruise's professional staff or press agents, certainly has never spoken to Mr. Cruise's sister about them and allegations of joking around about Mr. Cruise's romantic relations are manifestly false since it is inconceivable (to the entire world) that Mr. Cruise would have difficulty getting a girlfriend. This goes beyond not wanting to dignify a question with a response, but goes to the credibility and ethics of your journalist.

Beyond that, Ms. Orth's questions descend to tabloid gossip. It is nothing short of unbelievable that *Vanity Fair* would be so myopic (and stoop so low) as to be asking such ridiculous things as an unnamed girlfriend (which one?) "insulting" Mr. Miscavige (no matter the name of this *Vanity Fair* refusal-to-name-girlfriend, it never occurred-since Mr. Miscavige doesn't remember any girlfriend of anyone, in his entire life, insulting him), household staff reporting about, apparently, the daily recipe (anybody but a totally biased individual would see this as a ridiculous claim, since one hardly believes *Vanity Fair* believes Mr. Miscavige would hear about the comings and goings of his own household staff). Is Mr. Miscavige asked something sensible such as "How have you managed to organize the largest ongoing Church expansion project of any religion today, with millions of square feet of Church facilities under construction or renovation and new Churches opening on a monthly basis?" No. Instead, *Vanity Fair* forwards stupid questions akin to high school locker-break girlfriend/boyfriend gossip. Either way, the allegations are false.

As to the other questions directed to Mr. Miscavige, all of which Ms. Orth channeled from disreputable sources, the allegations contained therein are false.

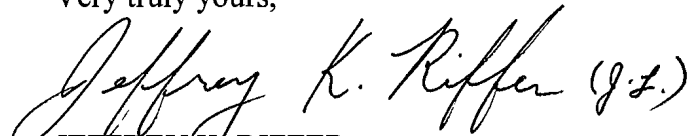
V. Don't Print Any Defamatory Allegations

The disgraceful allegations *Vanity Fair* apparently plan to publish about Mr. Miscavige are defamatory. If *Vanity Fair* goes forward with publication of such defamatory allegations, now that it is on notice that the story is false, the stain on its reputation will last long after any reader even remembers the article. The sting of the jury verdict will last longer still; far longer than any pleasure from racing to publish a poorly researched and sourced story.

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There is no need to rush to publish the scurrilous allegations at issue here. This is not a story about national security, physical safety or "hot news." It is a story based on fictions manufactured by unsavory individuals who wish to do Scientology and Mr. Miscavige harm. Accordingly, we trust that *Vanity Fair* will not publish anything defamatory about Mr. Miscavige and that we will not need to meet at a deposition or in a court.

Very truly yours,

A handwritten signature in cursive script that reads "Jeffrey K. Riffer (J.K.)". The signature is written in black ink and is positioned above the printed name.

JEFFREY K. RIFFER

Elkins Kalt Weintraub Reuben Gartside LLP

JKR:JL

Ms. Maureen Orth
Vanity Fair Magazine

Mr. Wayne Lawson
Vanity Fair Magazine