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In the  
**Supreme Court of the United States**

OCTOBER TERM, 1970

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No. \_\_\_\_\_, ORIGINAL

FOUNDING CHURCH OF SCIENTOLOGY

PLAINTIFF,

v.

HIS EXCELLENCY LORD CROMER

AND

MR. BRIAN L. CROWE

DEFENDANTS

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**MOTION FOR LEAVE TO FILE COMPLAINT and COMPLAINT**

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*v.*

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\_\_\_\_\_  
**MOTION FOR LEAVE TO FILE COMPLAINT**  
\_\_\_\_\_

Comes now the Plaintiff, pursuant to the Rules of the Supreme Court of the United States, Rule 9, 3, through its counsel, Mr. John J. Matonis, to move this Honorable Court to grant leave to file the attached complaint. In support thereof, Plaintiff states:

1. This Honorable Court has original jurisdiction in this matter by virtue of the original jurisdiction grant of the Constitution of the United States, Article III, Section 2, to wit, "In all cases affecting Ambassadors, other public ministers and counsels . . . the Supreme Court shall have Original Jurisdiction."

2. Defendant, Lord Cromer is the Ambassador to the United States from Her Majesty Queen Elizabeth II, and Defendant Brian Crowe is the First Secretary for Information attached to the Embassy of the United Kingdom in Washington, D.C.

2.

3. Plaintiff is a religious corporation located at 1812 19th Street, N.W., Washington, D.C., 20009.

4. The attached complaint alleges that Defendants committed libel and claims damages as a result of said libel.

THE FOUNDING CHURCH OF SCIENTOLOGY

By its attorneys

JOHN MATONIS

CHARLES KUBINSKI

JOEL KREINER

April 1970

**FOUNDING CHURCH OF SCIENTOLOGY**

**PLAINTIFF,**

*v.*

**HIS EXCELLENCY LORD CROMER**

**AND**

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**DEFENDANTS**

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**COMPLAINT**

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1. Original jurisdiction for this action is founded under The Constitution of the United States, Article III, Section 2, as follows, "In all cases affecting Ambassadors, other public ministers and counsels . . . The Supreme Court shall have Original Jurisdiction."

2. Plaintiff is a religious corporation incorporated under the Laws of the District of Columbia, and is located at 1812 19th Street N.W. Washington, D.C. Defendant Cromer is the Ambassador to the United States from Her Majesty Queen Elizabeth II. Defendant Crowe is the First Secretary for Information at Her Majesty's Embassy in Washington.

3. Defendants on or about March 31, 1970, and at other times, published or caused to be published within the United States letters and pamphlets containing untrue and defamatory statements about the religious principles of The Church of Scientology. These statements included representations that Plaintiff was "not a religion at all" . . . "It is socially harmful and a menace to the public". In addition other derogatory statements such as "It alienates members of families from each other and attributes squalid and disgraceful motives to all who oppose." were published.

4. As a result of the above, Plaintiff suffered injuries, to wit, loss of parishioners, approbrium, reputation and income from contributions and pledges.

5. In addition, Plaintiff has also been injured in that its freedom to conduct services according to its religious preferences and its free exercise of religious doctrine has been threatened.

6. Defendant's utterances are such that it is clear that they were made with actual malice.

7. *Plaintiff* is entitled to punitive damages in the amount of one million two hundred thousand dollars.

8. *WHEREFORE*, Plaintiff demands judgement in the amount of one million dollars in compensatory damages and one million two hundred thousand dollars in punitive damages. Plaintiff also demands a preliminary and final injunction against further such utterances by Defendant and such other and further relief as is just.

THE FOUNDING CHURCH OF SCIENTOLOGY

By its attorneys

JOHN MATONIS

CHARLES KUBINSKI

JOEL KREINER

April 1970



