

COMMONWEALTH OF KENTUCKY
HOPKINS CIRCUIT COURT
MADISONVILLE, KENTUCKY 42431
CIVIL ACTION NO. 92-CI-00444

LAURA VANNOY PADGETT,

PETITIONER,

VS.

DEPOSITION FOR RESPONDENT

THOMAS CARTER PADGETT,

RESPONDENT.

Deposition of
DR. STEPHEN A. KENT

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Madisonville, Kentucky
May 9, 2001

A P P E A R A N C E S:

FOR PETITIONER:

Hon. William Whitledge
24 Court Street
Madisonville, Kentucky 42431

FOR RESPONDENT:

Hon. Wm. Clint Prow
123 East Main Street
Providence, Kentucky 42450

The deposition of Dr. Stephen A. Kent was taken telephonically at Adams Law Firm, 28 Court Street, Madisonville, Kentucky, on Wednesday, May 9, 2001, with the above-noted appearances.

PRELIMINARIES

MR. WHITLEDGE: I'm Bill Whitledge, and I represent the petitioner in this. And at 8:27 this morning, I received a fax from Mr. Clint Prow, in which he related that--or he sent me notices to take the deposition of a Dr. Kent and a Dr. Pardon, or a Mr. Robert Pardon, telephonically this morning at 9:30 and 10:30 respectfully.

I was notified yesterday afternoon at 2 o'clock that he wanted to take Mr. Kent's deposition this morning. I reluctantly agreed to that. I've worked around my schedule to get everything to take this deposition today. I am going to proceed to take Dr. Kent's deposition by phone, but I object to the taking of any deposition of Mr. Pardon. And the notice was not proper. I'm waiving the requirement of notice on Dr. Kent. All right. Go from there.

Dr. Stephen A. Kent, after being duly sworn, testified as follows via speakerphone:

DIRECT EXAMINATION BY HON. WM. CLINT PROW:

Q. Dr. Kent, my name is Clint Prow. I'm here today representing the respondent, Tom Padgett. Also present is the court reporter who affirmed you in, and also Mr. Bill Whitledge, who's representing the petitioner, Laura Padgett. That's all of the persons that are present here today.

A. Okay. Hello.

Q. First of all-- Can you speak up a little bit, Dr. Kent?

A. I'll try to.

Q. Before we get started, Dr. Kent, have you ever had your deposition taken before?

A. Only once. This is in a case in Austin, Texas, and this was a case involving a car accident.

Q. Okay. Well, I'll go over a few ground rules, then. I'll be asking you some questions, and then Mr. Whitledge will have the opportunity to ask you some questions. If I get to speaking too fast, just let me know and I'll slow down. Be sure to answer all of the questions clearly, as the court reporter is

transcribing us here today. And if you don't understand a question, just let me repeat it, or Mr. Whitley repeat it, and we'll go from there. If for any reason you need to take a break, just let us know and we can do that.

A. Okay. That's fine.

Q. Any questions before we start?

A. I don't think so.

Q. Would you state your name for the record?

A. Yes. My name is Stephen, S-T-E-P-H-E-N, middle initial A, and the last name Kent, K-E-N-T.

Q. And what is your occupation, Dr. Kent?

A. I'm a sociologist in the sociology department at the University of Alberta in Edmonton, Alberta, Canada.

Q. And what is your level of education?

A. I've got a Ph.D.

Q. Where did you attend school at?

A. I got my BA from the University of Maryland, College Park. I got my first master's degree from the American University in Washington, D.C., second master's degree from McMaster. That's M-c-M-A-S-T-E-R. McMaster University in Hamilton- Ontario. and got a Ph.D

from McMaster University in Hamilton, Ontario.

Q. And have you previously provided me a cv dated April 26 that lists your education and your professional contributions and this sort of information?

A. Yes, I did.

MR. PROW: Okay. I'd like to attach that to his deposition as Exhibit A.

MR. WHITLEDGE: Do you have a copy?

MR. PROW: We can make you a copy.

(Dr. Stephen A. Kent's Curriculum Vitae is marked Exhibit A and is filed at the close of this transcript.)

Q. Where are you currently employed, Dr. Kent?

A. At the University of Alberta.

Q. And how long have you been there?

A. I first arrived there in January 1984, and I've been there, except for one year, while I was at the University of Waterloo, which is in Ontario.

Q. And what is your specialization there at the University of Alberta?

A. I'm a sociologist of religion, in the study of what often are called alternative religions. I also teach the sociology of deviance.

Q. What groups have you studied as a

result of that specialty?

A. Goodness. Specifically I've published on groups such as Children of God family Scientology, Quakers, a broad area of Puritan groups, and then I've mentioned a lot of new and alternative religions in various publications.

Q. What has been the nature of your study of Scientology?

MR. WHITLEDGE: Note my objection to this question. The court has specifically ruled, both Judge Boteler and Commissioner McClure, that Scientology is not an issue nor to be discussed in this matter.

MR. PROW: I'd like to make a response to that objection for the record, that as the testimony will show, all of this--the evidence presentable will relate to the issues of income and child support along these lines. Go ahead and answer, Dr. Kent.

A. Okay. I've studied various aspects of Scientology, some of the studies have involved analyses of doctrines. Others have analyzed Scientology as a social movement. Some have analyzed the organization's national and international lobbying effort. Some of the analyses have analyzed Scientology, you might say behaviors toward opponents and perceived opponents.

Q. How long have you been studying

Scientology?

MR. WHITLEDGE: Again, note my objection.

A. More or less since about 1986, 1987. Certainly by 1987, I believe my attention shifted toward Scientology as one of the number of groups I was studying at that time.

Q. And has been a continuous study since that time, or do you no longer study Scientology?

A. It's amongst other groups. It remains-- It has been a continuous focus of study. It certainly remains so.

Q. So do you feel you're familiar with their writings and doctrines and beliefs?

A. I am, yes.

Q. Okay. Does Scientology have any policy that you're familiar with through your studies concerning members that leave the group and then criticize Scientology?

MR. WHITLEDGE: Note my objection to that question.

MR. PROW: Go ahead and answer, Dr. Kent.

A. Yes, it does. The policy-- Well, two general ones. I can think of one involves policy towards what the organization calls suppressive persons. The other policy that I can think of relates

to people called PTS, which stands for potential trouble sources.

Q. What are the nature of those policies and how are they used against the persons that identify that--

MR. WHITLEDGE: Again, note my objection.

A. The suppressive person policy allows the organization to identify people and/or organizations that Scientology, Scientology leadership considers to be opponents. By opponents I mean people who take actions, make statements and so on that the organization perceives intend to hurt Scientology or to hurt its image, to hurt its ability to advance, to recruit new members, hurt its standing in the community, and so on.

By identifying a person or an organization as a suppressed person identifies behaviors that Scientologists in good standing are to take towards those perceived enemies. Kinds of actions that Scientologists can make through the suppressive person doctrine certainly involve what in other contexts we would call shunning, avoidance of any and all social contact; but for stronger--for more--for opponents whose actions are perceived to be more intense, then Scientologists can take more aggressive actions against those persons and/or organizations.

MR. WHITLEDGE: Again, note my objection to that. This man has not qualified as an expert. He's a professor at the University of Alberta and has said that he has studied it. There is no showing as to how much study he's done and what his knowledge of Scientology is, where it came from, experiences, et cetera; and I object to any further testimony against Scientology because this fellow has not been qualified as an expert.

MR. PROW: On the record, I believe Dr. Kent's qualification listed in his CV would speak for themselves and would qualify him as an expert, along with his subsequent--his already testimony and the subsequent testimony that he will have will qualify him as such to speak on this topic.

Q. Dr. Kent, these policies that you have testified to, what is your basis of these policies? How are you familiar with them?

A. Oh, I've read them.

Q. What have you read them in? On what basis is your knowledge of these policies?

MR. WHITLEDGE: Again, note our objection.

A. You may recall in the written statement, I talked about the identification of these policies in old volumes published in the 1970's and then in revised versions published in Scientology books

in 1991. I'm talking specifically here about the suppressive person, their policies. So I've read and compared both of those policies in Scientology publications.

Moreover, I've also used other Scientology publications to identify its current policies, for example on what's called disconnection. Disconnection is one kind of behavior that's related to association with a perceived suppressive person. So, in essence, I've used Scientology's own documents.

Q. So your testimony, your previous testimony, your subsequent testimony, this is testimony of these doctrines actually from the literature of Scientology?

A. Oh, yes. Oh, yes.

Q. You define these policies in your previous testimony. Based upon these policies, what sort of examples of actions would members of Scientology take against a suppressive person?

MR. WHITLEDGE: Again, note our objection to this. We've gone to the court and asked that all Scientology discussions be suppressed. The court has affirmed that. Judge Boteler and Commissioner McClure have both stated that Scientology is not an issue in this action.

A. Well, what I tried to focus on, on here are behaviors, and the range of behaviors that the Scientology organization has taken against opponents are quite varied. It depends upon the kind of social roles that the particular targets are playing.

Scientology has used private investigators extensively in its activities. I think, for example, about reports that appeared in the British press, oh, in the early- to mid-nineties when a biography of a founder, L. Ron Hubbard, was scheduled to appear on British television. In that instance, an American private investigator went to England, and a picture of him actually showed up in a British newspaper, and he was calling around to friends and associates of the producer, trying to get information in an attempt apparently to block this t.v. show from going on.

So the group has used private investigators. Often these investigators contact people's places of employment, the neighborhoods in which they live. Sometimes Scientology--Scientologists will picket. Sometimes Scientologists will attempt to essentially hurt or damage a person's reputation. The logic seems to be that if a person's reputation can be discredited, then comments will carry much less weight.

So, based on all of these kinds of statements

and part of statements that's actually in one of Scientology's old publications about fair game. And if you wanted, we could find this. It has to do with the statement-- The statement has to do with find or manufacture against a person. It's this kind of activity that causes concern among people who make critical comments. That is to say, sometimes Scientology will have legitimate grievances against the person who makes the statement. Other times, these opponents, right or wrong, feel that material evidence-- material or evidence gains them. It's manufactured. It's made up. And this evidence is manufactured or made up simply to discredit the source, and the source in this case would be a suppressive person or organization.

So a broad range of character assassinations--the history of some--dirty tricks, there have been documented cases in the United States as well as Canada about burglaries, break-ins to buildings and so on. So I'd say a wide range of activities all intended to either get dirt, if you will, on a person; in some cases, to manufacture dirt or evidence, and then generally to discredit the person to damage the person's reputation and/or career.

Q. That was my next question, Dr. Kent.

An action by Scientology against a former member and/or someone who criticizes Scientology, would these actions include targeting one's career and professional opportunities?

MR. WHITLEDGE: Note my objection again. Until we get to the point of visitation or child support, this is evidence that the court has specifically instructed the respondent not to delve into. If you've got something that you can contribute to this, Mr. Prow, please get to it, other than your accusations and this man's unverified opinions of Scientology. We object to all further proceedings on this.

MR. PROW: For response, evidence of one's career, as we're getting into now, is going to be relevant in regard to the calculation of child support. Go ahead and answer, Dr. Kent.

MR. WHITLEDGE: How-- Would you please explain to us how that's going to be relevant?

MR. PROW: Well, I don't think we have to argue on the record, but we're-- To calculate child support, we've got to determine appropriate level of income for Mr. Padgett, which is going to be an issue at our hearing.

MR. WHITLEDGE: Does this man know

MR. PROW: We're getting to why Mr. Padgett's income is at the level it is now, and that's the relevance of this testimony. But I don't think we have to argue that today. Go ahead and answer, Dr. Kent.

A. Okay. If I could have you restate the question just so that I stay focused in my answer, that would be very helpful.

Q. That would be fine. You'd mentioned these targets that actions that Scientology would take. My specific question was, would these actions include targeting one's career or professional opportunities?

A. Oh. yes.

Q. What sort of actions, from your research and your knowledge, would a Scientology take to attack one's career and professional opportunities?

MR. WHITLEDGE: Again, note my objection.

A. Well, what seems to happen in a number of cases is that a person's employer will receive phone calls, letters, often anonymous, making character's versions (sic), making derogatory statements about the particular targets; character moral standings and so on; in ways that could, if true, reflect upon the person's ability to perform the job.

Sometimes Scientology will use media, public media, in order to further its own claim. Sometimes

Scientology will use its own media outlet to further its own claims.

In a few instances-- perhaps even more than a few, actually-- Scientology will picket a person's place of work or residence. So any kind of actions to put in an employee's--an employer's--excuse me--an employer's mind that this particular employee who Scientology has identified as a suppressive person is a detriment to the organization.

Q. And what again is your basis of knowledge for these methods that Scientology would use to attack one's career or professional opportunities?

A. Oh, I can even go back to stipulation of evidence involving a conviction of first nine then two more Scientologists by the U.S. Federal Government. The stipulation of evidence--from memory now, I could be off a year or so on the years--probably somewhere between 1978 and 1980, I remember specifically there was an attorney in this particular case named Raymond--I'm not quite sure how to spell his last name. Scientologists dressed up in a gorilla suit--in a baboon suit, in essence, and tried to mock him in that way.

So it's these kinds of actions that go well back in the Scientology history that provide documentation, and the reason I mentioned this

particular incident is, it's documented in--I believe in the stipulation of evidence agreed to by both parties in this particular legal suit.

Q. So your knowledge is not only Scientology literature but actual incidents that you've researched yourself?

A. Well, certainly. You may also recall in the statement that I sent, as I specifically quoted excerpts from an article on fair game.

MR. WHITLEDGE: Note our objection. What has he sent that he's quoting from?

Q. Let me go ahead and ask this question so we can get this into the record, Dr. Kent. This literature that you're referring to from Scientology and explanations regarding them, are they included in a written notarized statement that you forwarded to me on April 27, 2001, listing and describing some of the literature that you've testified to so far in your deposition?

A. Not the stipulation of evidence that I mentioned, but I was about to mention, I did quote from--in that document that I sent you, I did quote from an article by a J.P. Kumar titled, Fair Game: Leveling the Playing Field in Scientology Litigation.

Q. Dr. Kent, in some of the--and you have

referenced the literature that you are testifying to in this notarized statement?

A. I referenced this particular article.

MR. WHITLEDGE: Can we examine that?

MR. PROW: Yeah. I'd like to-- We'll give you a copy, and I'd also like to attach this, since Dr. Kent has referred to it, we'd also like to attach this to the deposition as Exhibit B.

MR. WHITLEDGE: I object to it on the grounds that it is again addressing the issue of Scientology, and the court has said on numerous occasions for Mr. Padgett to please stop this proceeding--procedure.

(The statement is marked Exhibit B and is filed at the close of this transcript.)

Q. Dr. Kent, have you had the occasion to meet Mr. Thomas Padgett?

A. I did, yes.

Q. Where did you meet Mr. Padgett?

A. I attended a conference by a group called the Leo J. Ryan Foundation. I could be off on the date, but I believe it was February 1999, and I met Mr. Padgett at that conference.

Q. And at that time, did you have conversations with Mr. Padgett?

A. I did, yes.

Q. Okay. What was the substance of those conversations?

A. Well, just generally speaking, some were short conversations, and then we had an extended conversation that went on for, oh, hours. It could've been six hours, which is, I think, the figure I gave, which means it could've been five hours, it could've been seven hours. But a great deal of that particular conversation I remember was me trying to get a background on his case. I had heard his name, probably read it on the Internet, but I wanted to hear from him what he believed was going on. So we spent a long time talking about his case. Then throughout the conference, you know, we had short conversations. I did also attend a talk that he gave at that conference in which he talked about his case.

MR. WHITLEDGE: Where was that conference?

Q. Where-- I think-- Where was the conference at?

A. It was in Stanford (sic), Connecticut. No. Is that right? It was in Connecticut. I think it was in Stanford (sic), but I could be off on the town.

Q. And have you had conversations with Mr. Padgett since that conference?

A. Actually only a couple. We've talked a

few times, but-- So, yes. I don't know how extensive the conversations have been.

Q. Now, since your conversations with Mr. Padgett and your research into his situation, in your professional opinion do you feel that Scientology would be likely or has targeted Mr. Padgett?

MR. WHITLEDGE: Note our objection. That has not laid the ground work for any evidence to that affect.

MR. PROW: Go ahead and answer, Dr. Kent.

A. The only conclusion that I can reach is that Scientology has targeted Mr. Padgett. The evidence of that conclusion comes from a number of sources. I stated in the declaration that I sent, for example, that in one of Mr. Padgett's locations, I believe it was Florida, he found his garage vandalized. And on the wall--

MR. WHITLEDGE: Note our objection to that. The court has already heard evidence concerning that alleged damage to his garage.

MR. PROW: Go ahead, Dr. Kent.

A. From a copy of--a photocopy of the police report in this incident--and the court will forgive me for using this language--but someone had spray-painted, Shut the Fuck Up, with the S under Shut

emphasized and the P under Up underlined. Those two letters are SP, which is the condition of the character of the negative identification we're talking about here. There was also another incident I believe in Michigan where a person had written Shut Up with the S and the P underlined.

Since submitting my statements, Mr. Padgett provided me with more information. He claims he has received mailings which have similar kinds of statements to him. I also read a report from a private investigator that Mr. Padgett hired, and this private investigator identified a person who himself claimed to be a private investigator who was trying to acquire evidence and information about Mr. Padgett. This person appears himself to be a Scientologist. Now, the private investigator's report did not definitively make that conclusion. It came close. I asked Mr. Padgett about it, and he said that he indeed had found this gentleman's name on a Scientology list of people who use Scientology in so-called business technology

So, in those kind of instances, it seems very clear. And moreover, the Scientology policies are very clear, are very definitive about the kinds of actions that organization representatives must take.

Mr. Padgett has spoken about Scientology

publicly, I believe at least two conferences. I have a copy, of one fairly long article he wrote, I believe, for the Cape Cod Times. So he has spoken publicly. Moreover, when I saw Mr. Ofman's letter about Tom Padgett to the Cape Cod Times, it seemed very clear to me that Mr. Ofman was following a set of procedures concerning Tom Padgett's identification as being a suppressive person.

What was so striking about Mr. Ofman's letter is that very early in the letter, within the first sentence or two, Mr. Ofman referred to Mr. Padgett as "deadbeat dad, Tom Padgett." It's that kind of phrase that impugns, that damages one's character. That made it very clear to me that Mr. Padgett was a target.

Moreover, I did find a letter that I now have a copy of from Flag. Now, Flag is a Scientology organization in Florida. And Mr. Padgett had written the person. The person wrote back and said, in essence, You are not in good standing. If you wish to become a Scientologist in good standing, you must follow various steps outlined in suppressive person's declare policy. So here was a letter in which a Scientologist responding to Mr. Padgett actually quoted one of the suppressive person Scientology policies back to Mr. Padgett.

Mr. Padgett said he--told me that he learned

from a celebrity center--and I'm not sure which one, I believe it was Nashville--that he, Mr. Padgett, had been declared as a suppressive person. Consequently, the evidence to me looks definitive that Mr. Padgett has been identified as a suppressive person. If so, then a number of the actions that apparently have been taken against him makes sense.

Q. Now, Dr. Kent, in your professional opinion, does Mr. Padgett fit the pattern of an individual-- Why does Mr. Padgett-- You've already testified he does fit the pattern. Why does Mr. Padgett fit the pattern of someone that Scientology would target?

MR. WHITLEDGE: Note our objection to this.

A. Mr. Padgett fits the pattern of someone who would be targeted because he has spoken out publicly of Scientology, and he also apparently has raised the issue of Scientology and Scientology influence in this ongoing battle with his former wife.

Q. Now, Dr. Kent, based upon the information that has been provided to you and the information that you have acquired concerning Mr. Padgett, does the attacks that you've testified against Mr. Padgett, are they consistent with patterns of--that you've uncovered in the past, that actions that

Scientology would take against an individual that's been targeted?

MR. WHITLEDGE: Again, note our objection. The evidence is limited to his income, child support, visitation. We keep delving into Scientology, and Mr. Padgett's alleged effect, which have all been dealt with before by the court. Since 1992, this issue has been coming up. Now, if you've got some evidence to introduce affecting visitation or income, please bring it out.

A. And again, Mr. Prow, if you could restate the question so I can try to answer it as directly as possible.

Q. Okay. Dr. Kent, does the attacks and activities that you've testified against, based upon the information from Mr. Padgett and information you've been provided, would that be consistent based upon your research with actions that Scientology would take against an individual that's been targeted?

A. Oh certainly. Oh, yes. And one of the areas that has certainly direct potential relevance for this case would be a label put on people, including family members who have contact with an identified suppressive person. Family members who have contact with the suppressive person become what Scientology

calls PTS's, potential trouble sources.

And potential trouble sources are problems because whatever gains the Scientology says people may approve through the organization get mitigated or watered down by the contact. Consequently Scientology is very clear that potential troubled sources, PTS's, suppressive persons are encouraged to what Scientology calls disconnect, to cut off any contact with the suppressive person.

In this particular instance, in the case of the Padgett dispute over things like child visitation, a Scientologist in good standing would face a real dilemma if children were having contact, even on non-Scientology issues, with an identified suppressive person. Children moving between the two parents are identified in policy as PTS's, potential trouble sources. But desirable status, yes, in Scientology is to disconnect from the suppressive persons. In this case, pressure would be put on the children to cut off contact with the father.

Q. Now, Doctor, again, you jumped ahead of me a little bit, but we'll go ahead and pursue that since visitation is one of the issues that we have to address at our hearing coming up. From my understanding of your testimony, it's your testimony that if Mr. Padgett was identified as a suppressive person, that

a member of Scientology in good standing would attempt to prevent the children from having contact with that individual?

MR. WHITLEDGE: Note my objection to that. If this fellow knows why the restrictions on his visitation were placed by the court and what Mr. Padgett did that caused this court to place restrictions on Mr. Padgett's visitation in 1995. I do not think that this man is qualified to testify as to the restrictions on visitation or its effects.

MR. PROW: Go ahead and answer, Dr. Kent.

A. Again, if you could restate the question, please.

Q. In general-- And I believe you just testified to this, I was just restating it for the record and getting it clear. If a member of Scientology was in good standing and the other parent had been declared a suppressive person, would that member in good standing attempt--would it be their duty to restrict contact with the children with that suppressive person?

A. Oh, yes. The policy is clear. Yes. You will see for example in the statement that I offered, I discuss these issues in paragraphs 37 to 40, and if I could quote paragraph 38. Paragraph 38 says, "More specifically, a PTS Type I is one who is

associated with or connected to a suppressive person in his present time environment. By 'connected' is meant in the vicinity of, or in communication with in some way, whether a social, familial, or business relationship." That quote comes from the Church of Scientology International, The Scientology Handbook, published in Los Angeles by a Scientology publisher, Bride Publications, in 1994, and that quote comes from page 428.

Q. And, again, in general from your research and study of Scientology and this doctrine of disconnection that you testified to, would a member in good standing therefore attempt in any way possible to restrict contact between that suppressive person and children that they share together?

A. A member in good standing would have to attempt to restrict contact. At the very least, restrict. Certainly the goal would be to prevent any contact at all if the person wants to remain a member in good standing.

Q. Okay. And this would be an important-- This is an important doctrine, then, to a member in good standing, to avoid, I think you said, contact whatsoever?

A. Yes, it is.

Q. Where is that doctrine found?

A. Which one?

Q. The doctrine that you're testifying to, to prevent contact altogether?

A. Well, that's probably-- If you'd looked in paragraphs 37 and 38, you'll see the references that I've got there and also-- Well, to the extent that disconnection is a logical outcome of suppressive person documents, probably just looking at the very suppressive person sections that I've cited in the quotes combined with the PTS and disconnection would give you all of the policy citations that you need.

Q. Okay. Now, going back to the issue that we were pursuing in regard to these attacks that you've testified to upon Mr. Padgett. I believe you've testified that in your opinion you believe that he's been targeted, and he's been attacked.

A. Yes.

Q. Okay. In your professional opinion, do you believe that these attacks, and from what you know, have had an impact on Mr. Padgett's career opportunities?

MR. WHITLEDGE: Note our objection to that. I don't think that this witness is qualified as an occupational expert. I don't think this witness has

testified as to what work might be available to Mr. Padgett. I don't think that this fellow is qualified as a psychologist or a psychiatrist, and any testimony relating to it is improper testimony, and I object to him testifying to this.

MR. PROW: Go ahead and answer, Dr. Kent.

A. Well, let me just say that the intent of the suppressive person policy would be to severely limit Mr. Padgett's occupational opportunities, and the reason for these attempted limitations would in part be in the context of character assassinations but also in the context of helping the organization portray doctor-- (sic) or portray Mr. Padgett as a deadbeat dad.

Insidious--a hateful logic can go on here. The logic would be to hinder, damage, limit Mr. Padgett's ability to meet things like child support by causing damage to various jobs he's had and the ability of former employees or the willingness of former employers to hire him back. They use that economic damage as part of the portrayal of a deadbeat dad, which is exactly what Mr. Ofman did in his letter to the Cape Cod Times.

Q. Thank you, Dr. Kent. Have you-- Final question, Dr. Kent. Have you received any form of compensation for your testimony here today from any source?

A. No, I've not, and it's actually--it's cost me money in phone calls and courier things and whatnot. So.

MR. PROW: Thank you. That's all of the questions I have.

DIRECT EXAMINATION BY HON. WILLIAM WHITLEGE:

Q. Mr. Kent, what's your definition of deadbeat dad?

A. My definition of deadbeat dad is a person who is not--no obligation, responsibilities, especially when he has the means to do so.

Q. Would you classify a person who had income of a hundred and six thousand dollars in a particular year and did not pay any child support as ordered by the court to fall within that definition of a deadbeat dad?

A. Well, I'm not fortunately or unfortunately a social worker. So it's-- Nor am I legally trained. So I can give you an opinion, but it can't really be an expert one.

Q. Well, you have defined deadbeat dad as a father who has the means but it (sic) not supporting his children.

A. I did, but I can't even offer that as

an expert statement because I'm not trained as a social worker. I don't know specifically what the--

Q. Well, then, how can you say that a deadbeat dad statement in a newspaper is an attack on this fellow by Scientology?

A. Well, my opinion about what happened there, in this particular incident, the newspaper article identified Mr. Padgett as being thrown in jail for five years for being a deadbeat dad. And if I'm not mistaken, Mr. Padgett was out in, I think, thirty-three days, and he had been thrown in apparently because of an administrative error. I understand that he had filed checks, and an office in the state of Kentucky had lost or misplaced them. So that's my understanding.

Q. That's your understanding from Mr. Padgett, and I'm assuming that you have not reviewed the court record in neither the criminal action in which he pled guilty as a felon, nor have you reviewed the civil action involved in this matter?

A. I've looked at a lot of court documents. I can't tell you specifically which ones I've examined. And what sometimes happens in these kind of court cases is that people get really financially and emotionally worn down. And part of the tactic in Scientology seems to be to continue to drag people out

through extensive and expensive litigation. That kind of tactic, for example, is what is identified in Mr. Kumar's article that I mentioned in my declaration. So, whatever pleadings may or may not have gone on, there may be a larger social context for them.

Q. All right. Now, have you reviewed the court statement and the reasons that the restrictions were placed upon Mr. Padgett's visitation with the children?

A. I believe I have. I may be getting them confused with early statements, because, if I'm not mistaken, there's been a shift in the court's opinions about visitation.

Q. All right. And what was your understanding of the original reason for restrictions on visitation?

A. Well, the original reasons for visitation, it was that the children seemed to be doing very well in their environment in Kentucky, but Mr. Padgett had been granted the opportunity to have, oh, what, six weeks, I believe, if not longer, in the summer where he could visit the children, and then occasional visits on weekends that he would have to pay for or travel to visit himself. Now, I think over time, different courts, different proceedings have altered

those agreements. So it's always helpful to identify specifically the time frame here.

Q. Were you aware of the fact that he refused to return those children at the end of that designated visitation?

A. I don't know the details about these incidents. It seems to me I've heard something along these lines, but I cannot tell you details.

Q. Were you aware of the fact that he forced these infant children to sign affidavits that were later placed on the Internet for review by everyone?

A. I don't know that these children were infants. I have seen copies of statements signed by the children. I do not know the circumstances in which they were made, except I believe one of them supposedly has a witness, a minister. So I can't tell you anything more about them.

Q. So, in other words, you really don't know what the entire reasons for restrictions on visitation were?

A. Well, I don't know if I know the entire reasons.

Q. Now, your expertise is in religion in modern western society. Is that not true?

A. I'd say it's in alternative religions. Religion in modern western society is fairly broad.

Q. All right. And is it my further understanding that you have no training or experience in occupations within the United States and available work?

A. If you could explain that. You may notice that my BA and first MA are in the United States. And during that time and prior to it, I held jobs. I helped pay my way through university in part by working as a dormitory counselor and a teaching assistant.

Q. But you've never testified as to available work available to people in the United States, have you?

A. No, sir.

Line 16 on Page 34 through Line 7 on Page 35 deleted at the request of non-parties to this litigation to remain anonymous to assure protection as not to become targets and victims of FAIR GAME themselves.

Q. Now, it's my further understanding that this is the first time in which you've testified as an expert concerning religion, sociology, or modern western society?

A. No, sir. I've been admitted as an expert in--

Q. My question was, have you testified?

A. Yes. I testified in--well, let me see now-- three Canadian cases.

Q. Is the only time that you've given your deposition in the Texas car accident?

A. That's right. Yes.

Q. And have you ever testified in open court?

A. Three times in Canada.

Q. All right. And where were those three times?

A. One was in Edmonton, one was in a

courtroom just outside Edmonton, a place called Stony Plain; and a third was--I believe it was in a town called, if you can believe the name, Moose Jaw, Saskatchewan.

Q. In what? What was the name of the town?

A. Moose Jaw, M-O-O-S-E J-A-W, I believe.

Q. That's in Alberta, isn't it?

A. You know, sir, when you get down in southern Alberta and Saskatchewan, I think Moose Jaw is in Saskatchewan. There's a Medicine Hat, Alberta, but I believe my testimony was in Moose Jaw. It's been a number of years ago, so I'm not quite sure.

Q. All right. And those did involve sociology?

A. Yes. These were cases where the courts wanted my opinion on matters before it.

Q. And you testified in open court before the Queen's bench in those cases?

A. As far as I know, they were all before the Queen's bench. I know certainly the one in-- The one in Edmonton was a criminal case. So I'm not sure if that's Queen's bench or not. I'm not-- I've never studied in detail the Canadian legal system, so I may get some of the actual courts wrong in terms of their

title. But the one in Stony Plain, I was actually hired by prosecutors in--what was it--family services. Again, some of the titles might be a bit off, but I worked for them and did a report and then testified in open court about it.

Q. Now, your expertise is in sociology, is that not true?

A. Yes.

Q. And could that be defined as the science of human relations?

A. I define it a bit differently. I define it--well, sociology to be the study of the extent to which groups influence, if not determine, human behavior. It's a bit differently focused from the definition that you gave. The definition you gave has merit, but it seems broader. Your definition seems more applicable to social sciences in general.

Q. Now, just a couple of more questions. Your knowledge and contact with Mr. Padgett came from this one meeting in March--February or March of '99, in which you had up to a six-hour conversation with Mr. Padgett. Is that what you have testified to?

A. Yes, in addition to smaller conversations that weekend. Some subsequent-- Mr. Padgett and various other people have mailed to me

hundreds of pages of documents.

Q. Have -you made any attempt in any way to verify any of the statements that were made by Mr. Padgett to you at that meeting in February or March of '99?

A. I've not done any--I've not made any outside attempts to verify them in terms of getting a private investigator or whatnot.

Q. So it's my understanding that your opinion today is based totally upon what Mr. Padgett has related to you?

A. It's based in large part upon documents that I've got in my possession.

Q. Would you go through what documents you have in your possession?

A. Court of Kentucky, Hopkins Circuit Court, Order, dated 3-18-1994.; Commonwealth of Kentucky, Hopkins Circuit Court, Order, dated--there's no date, but there's April 1994.; Commonwealth of Kentucky, Court of Appeals, Appendix, which I believe is dated June 20, 1995. It's quite a number of pages here. Commonwealth of Kentucky, Court of Appeals, Appendix. This looks like March 13, 1996. Again, this is--I don't know. I'm guessing. I'll say fifty pages more, give or take. June 10, 1996, Commonwealth of Kentucky, Brief

for Appellant. Commonwealth of Kentucky, Brief of Appellant. I believe this date is May 18, 1997. A letter from the office of Attorney General, from Mark Rangleman, dated May 19, 1997. Looks like a report from Robert B. Sivley, S-I-V-L-E-Y, August 29, 1996. Commonwealth of Kentucky, Replied Brief for Appellant, August 1, 1997.

Q. Would it be a fair statement to say that he has supplied you with limited material concerning this proceeding?

A. You know, sir, I can't say one way or the other.

Q. Did he supply you with any of the appellee briefs?

A. I have to check. I thought there was material from the appellee in here, but I'd have to check to say definitively. What should I-- I'm waiting.

Q. I mean--

A. Sorry?

Q. He has not supplied you with much of the court record?

A. Well, he would--

Q. It is selective material that he has sent to you?

A. Well, again, not knowing the fully-- not

knowing the full extent of the court record, I can't really say how much I have versus how much there actually is.

Q. Okay. Would it be fair to say that you've got two full boxes of material?

A. Oh, I do not have two full boxes of material, no.

Q. Would you have a half a box of material?

A. Oh, no. I've got two large binders of material, if that helps.

MR. WHITLEDGE: Okay. I have no further questions.

MR. PROW: I have no further questions. Thank you, Dr. Kent.

MR. WHITLEDGE: I would like just for the record to ask that all of this testimony be stricken. This man has offered nothing to assist the court in ruling on Mr. Padgett's income or his ability to earn, nor has it in any way enlightened us on visitation and the lifting of the restrictions placed by the court in 1995 on Mr. Padgett's visitation.

MR. PROW: In response for the record, I believe the testimony of Dr. Kent has shown there would be reasons for the organization of Scientology to attack

his professional opportunities, which would have an effect upon his income, which is relevant for child support. Dr. Kent has also testified actions that Scientology would take against--a member in good standing would take against Mr. Padgett, which would be relevant in regard to seeking to restrict his visitation.

MR. WHITLEDGE: Thank you.

Witness excused

C E R T I F I C A T E

**STATE OF KENTUCKY
COUNTY OF MUHLENBERG**

I, Mildred S. Wells, a Shorthand Reporter and Notary Public in and for the State of Kentucky at Large, do hereby certify that the foregoing transcript of the deposition of Dr. Stephen A. Kent, having been duly sworn, on Wednesday, May 9, 2001, is true and accurate to the best of my knowledge, skill and ability.

**IN WITNESS WHEREOF, I have hereunto set
my hand and seal this 20th day of June, 2001.**

Mildred S. Wells

My commission expires: 2-06-05