

EXHIBIT "B"

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7 Pro Se

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re:) CASE NO.: 98-51326 ASW-7
12 KEITH HENSON,)
13 Debtor) ADV.NO.035136
14 HILLARY DEZOTELL, KEN HODEN, and)
15 BRUCE WAGONER,)
16 Plaintiffs,) SPECIAL INTERROGATORIES
17 vs.) RELATED TO EXTRINSIC FRAUD IN
18 H. KEITH HENSON) THE UNDERLYING CASES
19 Defendant.)
20)
21)
22)
23)
24)
25)

21 **PROPOUNDING PARTY: DEBTOR H. KEITH HENSON**
22 **RESPONDING PARTY: Clerk of the Hemet Court (Mellisa), 880 N. State Street, Hemet,**
23 **Ca. 92543**
24 **SET NO: ONE (NUMBERS 1-8)**

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INTRODUCTION

In his reply to creditor's (HILLARY DEZOTELL, KEN HODEN, and BRUCE WAGONER) Motion for Summary Judgment, Debtor Henson asked the court for more time to respond, one particular being that one creditor and witness, Ken Hoden, may have been under duress when he testified at the debtor's criminal trial. (Mr. Hoden was reliably reported in the Fall of 2004 to be in Scientology's notorious punishment program known as the "Rehabilitation Project Force" or RPF.) The court gave debtor additional time and permitted debtor to attack the underlying cases to his bankruptcy on the basis of extrinsic fraud.

So that debtor could attempt to show that the underlying criminal judgment was obtained through extrinsic fraud debtor was permitted discovery:

JUDGE WEISSBRODT: You're welcome to send out interrogatories, Mr. Henson. . . . you're not restricted in whom you can send an interrogatory to.

It is unusual for a court to grant such powers. But in this case, the creditors are a corporate front (RTC) for Scientology or interchangeable penurious members of an organization that exercises total control over their lives.

Further, Scientology has a well-established record of framing critics such as Paulette Cooper. The sentencing memorandum (UNITED STATES OF AMERICA v. MARY SUE HUBBARD, et al. Criminal Case No. 78-401) dated Dec. 3, 1979 includes this description:

" . . . [They] considered themselves above the law. They believed that they had carte blanche to violate the rights of others, frame critics in order to destroy them, burglarize private and public offices and steal documents outlining the strategy of individuals and organizations that the Church had sued. These suits were filed by the Church for the sole purpose of financially bankrupting its critics and in order to create an atmosphere of fear so that critics would shy away from exercising the First Amendment rights secured them by the Constitution."

1 Both "bankrupting" and "First Amendment rights" are common to the debtor's case
2 and the events that led up to the above case where 11 high-level Scientologists were sentenced
3 to prison. The above case was also rife with attempts to corrupt the judicial process. It might
4 be noted that Scientology has not changed the "scriptures" such as "fair game" or "training
5 routine lying" that "justified" such behavior in the years since that sentencing memorandum.
6

7 SPECIAL INTERROGATORIES

8 TO: The Party named above named and party's attorney of record, if any.

9 PLEASE TAKE NOTICE, that defendant and debtor above named requests that party
10 answer the following interrogatories under oath within 30 days from the date of service,
11 pursuant to Rule 33 of the Federal Rules of Civil Procedure and Bankruptcy Rules 9014 and
12 7033. Return this interrogatory to the above captioned address in Hemet.

13 In answering these interrogatories, furnish all information available to you, including
14 information in the possession of your attorney(s) and investigator(s) for your attorney(s), and
15 not merely such information known of your own personal knowledge. These interrogatories
16 shall be deemed continuing and in the event you discover further information that is
17 responsive to any of them, you are required to provide supplemental answers in accord with
18 FRCP 16(e). If you cannot answer the following interrogatories in full, after exercising due
19 diligence to secure the information to do so, so state, and answer to the extent possible,
20 specifying your inability to answer the remainder, and stating whatever information or
21 knowledge you have concerning the unanswered.

22 INSTRUCTIONS AND DEFINITIONS OF TERMS

23 The following definitions apply to each of the interrogatories and are deemed to be
24 incorporated therein:

25 1. The word "document(s)" means all handwritten, typed, printed, recorded or graphic
matter, photographic matter, sound reproductions, or computer input or output, however
produced or reproduced, pertaining in any manner to the subject matter identified.

2. The words "identify" or "identity" when used with reference to a natural person or
persons means to state, in addition to any information which may be specifically requested by
the interrogatory, the following for each person:

a. The person's full name;

b. The person's last known residence and business address;

c. The full name and address of the person's last known employer;

d. The name of any person or entity whom the person is claimed to have represented in
connection with the matter to which the interrogatory relates; and.

1 e. The person's employer and position at the time.

2
3 3. The words "identify" or "identity" when used with reference to an entity means to
4 state, in addition to any information which may be specifically requested by the particular
5 interrogatory, the following:

6 a. The name of the entity;

7 b. The address of the entity's main office;

8 c. The county in which it has its principal place of business;

9 d. The address of the office of the entity which is most directly connected to the matter
10 to which the interrogatory relates; and,

11 e. If a corporation, the state in which it is incorporated and the states in which it is
12 licensed to do business.

13 4. The words "identify" and "identity" when used with respect to a document or
14 documents, means to state, in addition to any information which may be specifically requested
15 by the particular interrogatory, the following for each document:

16 a. The nature and substance of the document;

17 b. Any title, caption, file numbers, symbols or other characteristics sufficient to enable
18 the document to be precisely identified;

19 c. The date or approximate date on which the document was prepared;

20 d. The date, if any, it bears;

21 e. The date it was transmitted;

22 f. The identity (as defined above) of the person who wrote, signed, initialed, dictated,
23 recorded, developed, or otherwise participated in the creation or formation of the document;

24 g. The identity of each addressee or recipient thereof;

25 h. The identity of the present (or last known) custodian thereof and of all copies
thereof; and,

i. To the extent that the answers to the preceding subparts are obtainable by an
examination of the document itself, you may respond to the same by attaching a copy of the
document to the answers to the interrogatories and referring to said document for answers to
each subpart.

5. The word "describe" when used in reference to an act, occurrence, event or
transaction means to provide, in addition to any information which may be specifically
requested by the particular interrogatory, all of the following information:

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a. The date, time and place thereof;

b. Identify as defined above each natural person thereat;

c. The name, employer and position of each natural person who participated therein or was otherwise connected therewith; and,

d. The nature and substance thereof.

6. As used herein, the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used and vice versa; in similar fashion, the use of the masculine form of a pronoun shall be considered to also include within its meaning the feminine form of the pronoun so used and vice versa; in a similar fashion, the use of any tense of a verb shall be considered to also include within its meaning all other tenses of verbs so used.

7. The following definitions apply to terms used herein (except as the context may otherwise clearly require):

a. The words "defendant", "debtor," or "Henson" refer to the defendant and debtor in this action.

b. The words "party", "you", "yours", "plaintiff", "creditor" or "claimant" refer to plaintiff in this action, the attorneys for plaintiff and persons or entities at any time employed by, associated with or acting for or on behalf of any of the foregoing.

c. The words "party", "you" and "yours" may also refer to others subject to these special interrogatories.

SPECIAL INTERROGATORY NO. 1:

As has been explained to Henson by a Hemet court clerk, in the year 2000, indictments were printed on 4-part carbonless paper. The copy marked "DEFENDANTS COPY" was notice to the defendant and was mailed if the defendant is not handed the paper on release. Is this your understanding of the indictment and notification process as it existed in September of 2000?

Yes _____ No _____

SPECIAL INTERROGATORY NO. 2:

1 If the above was not the procedure at that time, please specify how defendants who
2 were not in custody were notified. You may instead attach an official description of the
3 process as it existed September 1, 2000.

4 _____
5 _____
6 _____

7 **SPECIAL INTERROGATORY NO. 3:**

8 Please explain the process where the words "Release with letter to Appear" are entered
9 into the computerized court records. Particularly, is entering this information considered
10 equivalent to a sworn statement the defendant has been notified?

11 _____
12 _____

13 **SPECIAL INTERROGATORY NO. 4:**

14 If you answered yes on SPECIAL INTERROGATORY NO. 3, and the defendant was
15 handed the "DEFENDANT'S COPY" in court at the time of arraignment, would that indicate
16 that the notice to appear had not been mailed?

17 Yes _____ No _____

18 **SPECIAL INTERROGATORY NO. 5:**

19 Were mailed "DEFENDANT'S COPY" pages folded before being placed into an
20 envelope at that time?

21 Yes _____ No _____

22 **SPECIAL INTERROGATORY NO. 6:**

23 Are the names and addresses of the jury members and alternates still contained in the
24 records of your office?

25 Yes _____ No _____

1 **SPECIAL INTERROGATORY NO. 7:**

2 If the answer to the above question is no, where would this list be found?

3 _____

4 **SPECIAL INTERROGATORY NO. 8:**

5 In April 2001 what list was used to select jury pool members?

6 _____

7 **SPECIAL INTERROGATORY NO. 9:**

8 In April 2001 what process was used to select jury pool members?

9 _____

10 **SPECIAL INTERROGATORY NO. 10:**

11 In April 2001 were the notices mailed to jury pool members?

12 Yes _____ No _____

13 **SPECIAL INTERROGATORY NO. 11**

14 In April 2001 were any precautions in place to prevent jury pool notices from being
15 stolen or diverted?

16 Yes _____ No _____

17 **SPECIAL INTERROGATORY NO. 12:**

18 In April 2001 when jury pool members reported, were they identified by any means
19 other than the mailed notice?

20 Yes _____ No _____

21 **SPECIAL INTERROGATORY NO. 13:**

22 If the answer to the above question is yes, what methods (example, driver's license)
23 were used?

24 _____

25 _____

1 **SPECIAL INTERROGATORY NO. 14:**

2 You may attach a list of names and addresses (if known) of actual jury members and
3 alternates and skip the next question. If you cannot provide such a list, proceed to the next
4 question.

5 **SPECIAL INTERROGATORY NO. 15:**

6 Below is a list of the 55 members of the jury pool. Put a J after the names of the 12
7 persons were chosen as a jury member and an A after the names of the two alternatives.

- 8 ALEXANDER, TONI MARIE _____
9 ALLEN, JACK ELWYN _____
10 ANDREWS, SAMANTHA JANE _____
11 BASKETT, CONSTANCE HELEN _____
12 CABRERA, KAREN NICOLE _____
13 CAMERON SR, RAYMOND RONALD _____
14 CAPEK, RICHARD CHARLES _____
15 CARRISOZA, PAUL NANEZ _____
16 CRUM, PATRICIA ANN _____
17 CULLINS, COLLEEN DIANE _____
18 DANIELS, WILLETHA SHAVON _____
19 DEWIT, KRISTIN JEAN _____
20 DUNTON, BILL LEE _____
21 DUVAL, COQUETTE ROMA MICHELE _____
22 EUBANK, BRET WAYNE _____
23 EWALT, LINDA MARLENE _____
24 FOSTER, KENNETH SCOTT _____
25 GROVEUNDER, DONNA LEE _____
HATHAWAY, RICHARD CLINTON _____
HITCHCOCK, MARY R _____

- 1 JOHNSON, TYRA ANN _____
- 2 JOHNSTON, PAMELA ELAINE _____
- KENDRICK, MISTY ANN _____
- 3 KINGSTON, JOHN EDWARD _____
- 4 KITCHEN WENDIFRED C _____
- 5
- LANGE, JAMES KEITH _____
- 6 LINDQUIST JR, ROBERT VERNON _____
- 7 LOMBARDY, BRANDY LYNN _____
- 8 LOYD, CONNIE LOU _____
- 9 LUOMA JR, DANIEL JAMES _____
- 10
- MACON JR, CHESTER R _____
- 11 MARQUEZ, GEORGE _____
- MARSHALL, SUSAN DELORES _____
- 12 MC CANN, ROGER ALAN _____
- 13 MCCALL, JOYCE ELAINE _____
- 14
- MENDEZ, ROSA _____
- 15 METCALFE, BEVERLY MAIN _____
- 16 MITCHELL, TAMARA RENE _____
- 17 MONTEMAYOR, MARINA _____
- 18 O MALLEY, TARA MAUREEN _____
- 19
- OCONNOR, CHARLES MICHAEL _____
- 20 RAULSTON, DOLORES ANN _____
- RENCK, ALLISON LEIGH _____
- 21 RUE, GARY ALAN _____
- 22 SCHMIDT, RUDY ELIAS _____
- 23
- SCOTT, KIRK EUGENE _____
- 24 SHAUGHNESSY, KEVIN FRANCIS _____
- 25 SMITH, JOHN ALLEN _____
- SOREN, NORMAN _____

1 SPEAR, DAVID AARON _____
2 VAIL, DEBORAH LYNN _____
3 VONWECKMANN, PAUL BERNARD _____
4 WATTS, DOROTHY LORRAINE _____
5 WHALIN, KIMBERLY DAWN _____
6 WHITE, ELIZABETH M _____

H. Keith Henson

9 Dated Aug. 9, 2005

H. Keith Henson, pro se,
(Acting under the July 26, 2005 order of
Federal Bankruptcy Judge Arthur S. Weissbrodt)

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