

**EXHIBIT "D"**

H. Keith Henson  
c/o Ida Camburn  
1270 Vista Grande Dr.  
Hemet, CA 92543  
Telephone: (519) 770-0646  
(519) 774-1620 cell

Pro Se

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re:	)	CASE NO.: 98-51326 ASW-7
	)	
KEITH HENSON,	)	ADV.NO.035136
Debtor	)	
	)	
HILLARY DEZOTELL, KEN HODEN, and	)	
BRUCE WAGONER,	)	<b>SPECIAL INTERROGATORIES</b>
	)	<b>RELATED TO EXTRINSIC FRAUD IN</b>
Plaintiffs,	)	<b>THE UNDERLYING CASES</b>
	)	
vs.	)	
	)	By the order of Judge Weissbrodt
H. KEITH HENSON	)	
	)	July 26, 2005
Defendant.	)	
	)	
	)	

---

**PROPOUNDING PARTY: DEBTOR H. KEITH HENSON**

**RESPONDING PARTY: DAVID J. COOK, ESQ. (State Bar # 060859), COOK,  
PERKISS & LEW, A PROFESSIONAL LAW CORPORATION 333 Pine Street, Suite  
300, San Francisco, California 94104**

**SET NO: ONE (NUMBERS 1-35)**

**INTRODUCTION**

**EXHIBIT D**

In his reply to creditor's (HILLARY DEZOTELL, KEN HODEN, and BRUCE

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.”

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

## SPECIAL INTERROGATORIES

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

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

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

### INSTRUCTIONS AND DEFINITIONS OF TERMS

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

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

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

- a. The name of the entity;

- b. The address of the entity's main office;
- c. The county in which it has its principal place of business;
- d. The address of the office of the entity which is most directly connected to the matter to which the interrogatory relates; and,
- e. If a corporation, the state in which it is incorporated and the states in which it is licensed to do business.

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

- a. The nature and substance of the document;
- b. Any title, caption, file numbers, symbols or other characteristics sufficient to enable the document to be precisely identified;
- c. The date or approximate date on which the document was prepared;
- d. The date, if any, it bears;
- e. The date it was transmitted;
- f. The identity (as defined above) of the person who wrote, signed, initialed, dictated, recorded, developed, or otherwise participated in the creation or formation of the document;
- g. The identity of each addressee or recipient thereof;
- 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:

- 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.

d. Some of the questions may be directed to determining the party responsible for the continuing extralegal harassment of the debtor (related to the continuing extrinsic fraud).

### **SPECIAL INTERROGATORIES**

On April 29, 2005, in Brantford, Ontario, debtor held for the police and eventually identified a private investigator, Robert Del Bianco. Del Bianco is now charged with assault. Del Bianco was working for a private investigation agency run by David Brewer. An Ontario Provincial Police officer (Gino Tatasciore) informed debtor that Mr. Brewer's agency was subcontracted to another agency and that he talked with the client of this second level agency. The person to whom Officer Tatasciore spoke claimed to "be involved" in a lawsuit against debtor in the US. The officer was reluctant to name the party, citing Canadian privacy laws although Canadian privacy laws probably do not apply to non-Canadians outside of Canada.

This bankruptcy is the only legal action in the US of which the debtor has been informed. Assuming the person did not lie, the OPP officer could have talked to RTC, Hilary Dezotell, Ken Hoden, Bruce Wagoner, the US Trustee or any of the attorneys or previous attorneys for these parties.

July 26, 2005, Judge Weissbrodt permitted debtor to propound interrogatories to determine who hired the PI firm whose agent harassed debtor and investigate debtor's claim that the underlying cases contributing to this bankruptcy were extrinsic fraud.

**SPECIAL INTERROGATORY NO. 1:**

Were you the person the OPP officer spoke to about this matter?

Yes \_\_\_\_\_ No \_\_\_\_\_

**SPECIAL INTERROGATORY NO. 2:**

Do you know who did speak to the OPP officer named above?

Yes \_\_\_\_\_ No \_\_\_\_\_

**SPECIAL INTERROGATORY NO. 3:**

If the answer to SPECIAL INTERROGATORY NO 2 is yes, who was it?

\_\_\_\_\_

**SPECIAL INTERROGATORY NO. 4:**

Do you know who hired the Canadian private investigators?

Yes \_\_\_\_\_ No \_\_\_\_\_

**SPECIAL INTERROGATORY NO. 5:**

If the answer to SPECIAL INTERROGATORY NO. 4 is yes, who was it?

\_\_\_\_\_

**SPECIAL INTERROGATORY NO. 6:**

Do you know anything about the hiring of a Canadian agency in regard to this case or the debtor other than what you have learned from the debtor?

---

---

---

---

**SPECIAL INTERROGATORY NO. 7:**

Your firm usually takes only a percentage of the recovery from cases it takes.

Was that the arrangement for this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

**SPECIAL INTERROGATORY NO. 8:**

If the answer to the above question was no, then what additional payment or other consideration was required?

---

**SPECIAL INTERROGATORY NO. 9:**

If payment or other consideration was required per above, the creditors you represent are known to be without funds. What party is responsible for payment or other consideration?

---

Dated Aug. 14, 2005

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

**SPECIAL INTERROGATORY NO. 9:**

---

DAVIS & WOJCIK A PROFESSIONAL LAW CORPORATION ROBERT A.

DAVIS, JR.,

State Bar No. 160357 JOSEPH M. WOJCIK, State Bar No. 177296 1105 E.

Florida Ave. Hemet, CA 92542 Telephone: (909) 652-9000 Facsimile:

(909) 658-8308

LAW OFFICES OF ELLIOT J. ABELSON ELLIOT J. ABELSON, State Bar No.

41846 8491 West Sunset Blvd., Suite 1100 Los Angeles, CA 90069-1911

Telephone: (323) 960-1935 Facsimile. (323) 650-0398

, DAVID J. COOK, ELAINE M. SEID, SAMUEL D. ROSEN, HELENA K.  
KOBWIN, KENDRICK MOXON, CAROL WU, SUSAN LUCE, UNITED STATES  
TRUSTEE, Gilbert Y. Nishino, JOSEPH M. WOJCIK, and ELLIOT J. ABELSON.