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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Case No. 8:13-cv-220-T27 TBM

LUIS A. GARCIA SAZ, and wife,
MARIA DEL ROCIO BURGOS GARCIA,

Plaintiffs,

vs.

CHURCH OF SCIENTOLOGY RELIGIOUS
TRUST, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF MICHAEL J. RINDER

Taken on Behalf of the Defendants

DATE TAKEN: JANUARY 6, 2015
TIME: 9:08 A.M. - 1:31 P.M.
PLACE: ZUCKERMAN SPAEDER, LLP
101 EAST KENNEDY BOULEVARD
SUITE 1200
TAMPA, FLORIDA

Examination of the witness taken before:

Susan D. Wasilewski
Registered Professional Reporter
Certified Realtime Reporter
Certified CART Provider Certified
Manager of Reporting Services
Florida Professional Reporter
~ Realtime Systems Administrator ~

1 declarations in connection with the Garcia matter, you
2 don't recall whether you had a hard copy of the policies
3 in front of you or whether you searched for them on the
4 Internet; is that fair?

5 A. No. And some of them are attached to things
6 that have been filed in the case, so I -- I don't know.

7 Q. Do you have a copy of pleadings that have been
8 filed in the case?

9 A. I have a copy of some of the pleadings.
10 They're online.

11 Q. I see. And how did you get the copies of
12 those?

13 A. I read Tony Ortega's blog. That's how I
14 usually get them.

15 Q. Tony Ortega, who is Tony Ortega?

16 A. He is a guy that has a blog in New York.

17 Q. And he's covered or published information about
18 this case?

19 A. Yes, he has, routinely.

20 Q. And you are -- and you are a regular reader of
21 information about this case?

22 A. Yes.

23 Q. Okay. Now, in connection with your consulting
24 services in this case, are you being compensated?

25 A. For consulting? Well, I was up until, I don't

1 know, April or May or something.

2 Q. April or May of 2014?

3 A. Yes, that's right.

4 Q. And about how much money in total have you
5 received as a consultant in this case?

6 A. I don't know. I'm sure -- I'm sure you've got
7 that number, Mr. Deixler.

8 Q. Do you have an estimate?

9 A. No.

10 Q. So in excess --

11 A. Maybe, like, you know, \$2,000 a month or
12 something. I -- I really actually don't know, but I'm
13 sure you've got it, so whatever the number is, you've
14 got it and I agree to it. It's whatever my bills are
15 that I assume have been turned over because I'm sure
16 you've asked for them. I know that they were turned
17 over before the last hearing and there hasn't been very
18 much since then, so whatever.

19 Q. And do you charge a rate or a flat fee, or how
20 do you calculate the value of your service?

21 A. By hour.

22 Q. Okay. And what's your hourly rate?

23 A. \$175.

24 Q. And is that the same consulting rate you've
25 charged in all of the other cases against the Church of

1 **Scientology or its affiliates?**

2 **A.** **Yes,** although some -- some of those I -- I
3 mean, it is the rate that I would charge but I don't
4 think that anybody else has paid me anything.

5 Q. So the only persons who have paid you for your
6 consulting work in cases adverse to the Church of
7 Scientology or their affiliates are the Garcias?

8 A. Correct.

9 Q. And you've been paid directly by the Garcias or
10 were you paid by lawyers?

11 A. No, by lawyers.

12 Q. Okay.

13 A. Oh, I'm sorry, Mr. Deixler. That Atlanta law
14 firm paid me for a day of work when they flew someone
15 down here to see me to go through documents with me.

16 Q. And were you charged -- did you charge them a
17 day rate or an hourly rate?

18 A. I don't remember.

19 Q. Other than in cases adverse to the Church of
20 Scientology, who else has paid you \$175 an hour for your
21 consulting work?

22 A. I'd prefer not to disclose the names of anybody
23 else that's paid me.

24 Q. Have you received any payments as a consultant
25 other than in connection with matters adverse to the

1 Q. 90 percent of your income was derived from your
2 other consulting businesses and public speaking, media
3 relations and the like; is that right?

4 A. That's --

5 MR. BABBITT: Objection; repetitive.

6 Q. And is that also true for 2013, sir, that about
7 10 percent of your income was derived from legal
8 consulting in matters adverse to the Church of
9 Scientology?

10 A. No. I'm sure that the percentage was greater
11 in 2013.

12 Q. Greater. How much do you think was the
13 percentage in 2013 on your income from legal consulting
14 adverse to the church?

15 A. Do you want me to guess?

16 Q. I'd like your best estimate.

17 A. Well, that would be a guess, so maybe 30
18 percent, maybe 40 percent.

19 Q. Okay. Somewhere between a third and 40
20 percent, would that be a fair estimate?

21 A. Yeah. I mean, that -- that's -- that's my
22 guess, Mr. Deixler. I don't real -- I don't really
23 know, but that's my guess. I'm just trying to answer
24 your question. It seems fair enough.

25 Q. And you said in April or May of 2014 the

1 opinions pertaining to the Church of Scientology?

2 A. Yes, of course. I don't consult them though.

3 Q. What's the difference between consulting and
4 speaking with them?

5 A. If someone comes and asks you questions about
6 what do you know and you answer those questions, that's,
7 to my -- in my mind, not the same as consulting, where
8 you have a formal agreement with someone to assist them
9 in whatever it is that they're doing. I have no
10 agreement with any media people or any terms or
11 conditions. It just they call me up, they ask me are
12 you willing to be interviewed, and I say yes or no.

13 Q. I see. Did you fly to England at the expense
14 of BBC for the purpose of being interviewed?

15 A. Yes.

16 Q. Did you receive any compensation other than
17 reimbursement or payment of expenses, hotel and flight?

18 A. No.

19 Q. Okay. How about with HBO, have you agreed to
20 appear at the Sundance Film Festival in connection with
21 the showing of their HBO show?

22 A. Yes.

23 Q. Are they going to pay you to do that?

24 A. No.

25 Q. Are they going to pay your expenses to do that?

1 A. Yes.

2 Q. Have you received any compensation from HBO for
3 your agreement to be interviewed or speak to them?

4 A. No.

5 Q. Have you requested it?

6 A. No.

7 Q. Have you sent them any kind of bill, invoice or
8 suggestion of future payment?

9 A. No.

10 Q. Other than HBO and the BBC, who else has paid
11 for your expenses in connection with your appearing at a
12 certain time or place in connection with the
13 demonstration of or making of a television program or a
14 interview for print media?

15 A. Nobody.

16 Q. The St. Pete Times has done that, haven't they?

17 A. No.

18 Q. You've never had expenses advanced by the
19 St. Pete Times in connection with interviews?

20 A. No, not -- never.

21 Q. Okay. So other than HBO and BBC, you have
22 never received any payment of any kind, be it free
23 airfare, hotel, food, or consulting fees from any media
24 source; is that true?

25 A. That's correct.