

1 **LAW OFFICES OF JUDY ALEXANDER**

2 JUDY ALEXANDER #116515

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7 STEVEN PRESSMAN

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 CITY AND COUNTY OF SAN FRANCISCO

10 LANDMARK EDUCATION  
11 CORPORATION,

12 Plaintiff,

13 vs.

14 STEVEN PRESSMAN,

15 Defendant.

Case No: 989890

16 DECLARATION OF JUDY  
17 ALEXANDER IN SUPPORT OF  
18 OPPOSITION TO MOTION TO  
19 COMPEL

Date: December 19, 1997

Time: 10:30 A.M.

Dept: Discovery, Room 610

Date Action Filed: September 26, 1997

Trial Date: Not set

20 I, Judy Alexander, declare as follows:

21 1. I am the attorney for the Defendant Steven Pressman ("Pressman") in the  
22 above-entitled action. I am duly licensed and admitted to practice before this Court. I make  
23 this declaration of my own personal knowledge and, if called upon to do so, I could and  
24 would testify thereto.

25 2. After Landmark Education Corporation ("Landmark") subpoenaed Pressman  
26 for his deposition in the action filed by Landmark against Cult Awareness Network and  
27 certain affiliates and affiliated individuals in the Circuit Court of Cook County, Illinois, case  
28 number 94-L-11478, and well before the date set for the deposition, I called James Lassart,

1 attorney for Landmark, to discuss the deposition. At that time I informed Mr. Lassart that in  
2 responding to deposition questions Pressman would assert his rights as a journalist not to  
3 disclose his sources or unpublished information obtained or prepared while he was engaged  
4 in gathering information for dissemination to the public.

5 3. Attached hereto as Exhibit A is a copy of Landmark's Separate Statement of  
6 Questions and Responses in Dispute served on Pressman with the disputed questions  
7 numbered in the left margin for ease of reference.

8 4. Attached hereto as Exhibit B is a true and correct copy of pages 58 through 65  
9 of the transcript of Pressman's deposition.

10 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct. Executed this 12th day of December, 1997, at Capitola,  
12 California.

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15 \_\_\_\_\_  
16 Judy Alexander  
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**EXHIBIT A**

1 JAMES A. LASSART (SBN 40913)  
CAROL P. LaPLANT (SBN 85745)  
2 ROPERS, MAJESKI, KOHN & BENTLEY  
670 Howard Street  
3 San Francisco, California 94105  
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5 Attorneys for Plaintiff  
LANDMARK EDUCATION CORPORATION  
6  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE CITY AND COUNTY OF SAN FRANCISCO

10  
11 LANDMARK EDUCATION CORPORATION,

12 Plaintiff,

13 v.

14 STEVEN PRESSMAN,

15 Defendant.

CASE NO. 989890

SEPARATE STATEMENT OF QUESTIONS  
AND RESPONSES IN DISPUTE  
[California Rule of Court 335(a)]

DATE: November 10, 1997

TIME: 10:30 a.m.

DISCOVERY DEPT: Room 450, D-2

TRIAL DATE: Not Applicable

16  
17 The following are the questions and answers, verbatim, from the deposition of Steven  
18 Pressman taken by James A. Lassart for plaintiff Landmark Education Corporation in *Landmark*  
19 *Education Corporation v. Cult Awareness Network* (Circuit Court of Cook County, Illinois, No. 94-  
20 L-11478, hereinafter "the Illinois action") that give rise to this motion. Mr. Pressman was  
21 represented by Judy Alexander.

22 PAGE 22:10-24:3 (Question and Answer are shown in italics. The dialogue between counsel  
23 regarding the objection is shown in order to explain the meaning of the standard objection offered by  
24 Ms. Alexander throughout the remainder of these questions):

25 Q. In conjunction with the research of the book, did you have occasion to attend or  
26 view any trials?

1 Ms. Alexander: I'm going to object. The process and procedure and information and  
2 sources to whom Mr. Pressman may have talked, or sources of information for the book, are  
3 privileged information. Unless that information is published in the book, he is privileged to refuse to  
answer such questions under the California Shield Law, which is California Constitution, Article I,  
Section 2B, and Evidence Code Section 1070. And I'm going to instruct him not to answer.

4 Q. Did you ever attend a trial of a woman named Ms. Afromo?

5 Ms. Alexander: Again, same objection; same instruction.

6 Mr. Lassart: Just so you know, we may disagree on this but I don't believe in getting into  
7 long dissertations between counsel. Either you're right or you're wrong and there's another place to  
figure all this out. Okay?

8 Ms. Alexander: Fine.

9 Mr. Lassart: I don't want the silence to go as if I'm agreeing with you. That's all.

10 Q. Okay. At any time after the book was written and published, did you ever talk to  
Charlene Afromo?

11 Ms. Alexander: I mean, we can short - I'm going to make the same objection and instruct  
12 him not to answer these questions. And I would prefer not to have to repeat it all every time. Can I  
just say, Same objection?

13 Mr. Lassart: Yes...If you're going to make another objection, then you make that.

14 Ms. Alexander: I'll make it. But when I say, "Same objection," that's what I'm making and  
15 I'm instructing him not to answer the question.

16 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time and  
17 does not inquire into the witness's sources. The question merely asks whether he attended a certain  
18 public trial at any point in time. Answering this question would not reveal the witness's sources or  
19 research. The witness's entire life, contacts and research cannot all be included in the shield,  
20 particularly in light of Mr. Pressman's testimony that his research into the matters covered in his  
21 book was conducted between 1991 and 1993. Moreover, a book is not within a scope of the shield  
22 law that, by its terms, applies to a "newspaper, magazine or other periodical publication".

23 This question is foundational and relates to the accuracy of information disseminated  
24 by defendants in the Illinois action, including information that purportedly came from the Afromo  
25 trial.

26

2

1 PAGE 24:5-23:

2 Q. Have you ever participated in a project called the Forum?  
Ms. Alexander. Same objection.

3 Q. In your book, you wrote about the Forum. Did you ever attend a meeting of the  
4 Forum?

5 Ms. Alexander. Same objection.

6 Q. Do you recall ever signing in to attend a meeting of the Forum?

7 Ms. Alexander. Same objection.

8 REASON WHY ANSWER SHOULD BE COMPELLED: These are foundational questions,  
9 unlimited as to time, asking merely whether the witness attended a seminar that is open to the public,  
10 and the questions do not inquire into the identity of sources. Moreover, the witness's book is not a  
11 "newspaper, magazine or periodical publication", therefore its preparation is not covered by the  
12 newsman's shield.

13 This question relates to the accuracy of information disseminated by the Illinois  
14 defendants about Landmark and its educational seminar, the Forum.

3

15 PAGE 24:24-15:1:

16 Q. Have you ever used a fictitious name, other than your name, Steven Pressman?

17 Ms. Alexander. Same objection.

18 REASON WHY ANSWER SHOULD BE COMPELLED: Even if the newsman's shield were  
19 applicable to the preparation of Mr. Pressman's book, this question has nothing to do with the  
20 disclosure of his sources or unpublished research. The answer to this question would facilitate a  
21 more complete examination of the witness.

4

22 PAGE 26:3-5:

23 Q. Do you recall when you first met Mr. Wilson?

24 Ms. Alexander. Same objection.

25 REASON WHY ANSWER SHOULD BE COMPELLED: The witness was previously allowed to  
26 testify that he knows Mr. Wilson, an attorney. This question merely asks how long he has known

1 Mr. Wilson. Even if the newsman's shield were applicable to the writing of Mr. Pressman's book --  
2 and by its terms, it is not -- this question has no more tendency to disclose his sources than the  
3 question he was allowed to answer concerning his acquaintance with Mr. Wilson.

4 **PAGE 27:11-13:**

5 Q. Have you ever seen Laurel Sheaf give any kind of a presentation?

6 Ms. Alexander: Same Objection.

7 REASON WHY ANSWER SHOULD BE COMPELLED: After having testified previously that he  
8 had not met Ms. Sheaf, an instructor in the Forum, this question asks if he had ever seen her give a  
9 presentation, and is unlimited as to time. The question does not tend to disclose his sources or  
10 research.

11 This question is foundational and relates to the accuracy of information disseminated  
12 about the Forum by the defendants in the Illinois action.

13 **PAGE 27:14-16:**

14 Q. Did you graduate from the Forum?

15 Ms. Alexander: Same objection.

16 REASON WHY ANSWER SHOULD BE COMPELLED: As in the questions asked at pages 24:5-  
17 23, the Forum is offered to the public, and whether Mr. Pressman attended the Forum long enough  
18 to graduate does not reveal his sources or research, and is unlimited as to time. Moreover, as  
19 discussed above, the book and its preparation are not within the scope of the newsman's shield.

20 The accuracy of information disseminated about the Forum is a central issue in the  
21 Illinois action.

22 **PAGE 27:24-26:**

23 Q. Did you ever sign a confidentiality agreement in conjunction with the Forum?

24 Ms. Alexander: Same objection.

25 REASON WHY ANSWER SHOULD BE COMPELLED: The signing of a confidentiality  
26 agreement is a contractual activity outside the scope of the shield. Even if the shield were somehow

1 otherwise applicable to the writing of Mr. Pressman's book, the shield would be waived by the  
2 witness's entering into a contract.

3 PAGE 28:10-11:

4 Q. Have you ever been to Landmark's offices?

5 Ms. Alexander: Same objection.

6 REASON WHY ANSWER SHOULD BE COMPELLED: The witness was allowed to testify about  
7 writing to Landmark (at page 35:19-36:1). There is no discernible distinction between writing and  
8 visiting, and no tenable reason why one question would be subject to the newsman's shield while the  
9 other would be outside the scope of the shield. In addition, the question is unlimited as to time.  
10 Finally, plaintiff contends that the newsman's shield is inapplicable to the preparation of Mr.  
11 Pressman's book.

12 This question is relevant because it pertains to the accuracy of information about  
13 Landmark disseminated by the defendants in the Illinois action.

14 PAGE 28:25-29:2:

15 Q. Did you ever give Mr. Wilson any information regarding the Forum?

16 Ms. Alexander: Same objection.

17 REASON WHY ANSWER SHOULD BE COMPELLED: "Give" is emphasized, because  
18 information given by the witness to others is outside the scope of the shield, assuming that the shield  
19 were somehow applicable, because such information is necessarily disclosed by giving it to a third  
20 party who is not himself entitled to claim the newsman's shield. (Mr. Wilson, referenced here, is an  
21 attorney.) Also, the question is unlimited as to time.

22 PAGE 29:22-24:

23 Q. Did you ever talk to anyone who identified themselves as Seth Derrish?

24 A. Same objection.

25 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time and  
26 not indicative of Mr. Pressman's sources or research for his book, even if the shield were applicable



1 to the writing of the book. Also, the witness was previously allowed to testify that he never met Mr.  
2 Derrish. The objection is arbitrary, because the distinction between meeting someone and talking to  
3 them is indiscernible.

4 The question is foundational and pertains to the accuracy of information disseminated  
5 by defendants in the Illinois action.

6 PAGE 30:1-6:

7 Q. Did you ever talk to Paul Gutfreund?

8 Ms. Alexander: Same objection.

9 Q. Have you ever been on the houseboat that Mr. Gutfreund used to own in Marin  
10 County?

11 Ms. Alexander: Same objection.

12 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time and  
13 not indicative of Mr. Pressman's sources or research for his book, assuming that the shield were  
14 applicable to the writing of the book - which it is not. The second question, regarding the  
15 houseboat, merely asks whether he has visited a particular place at any time in his life, and reveals  
16 nothing about his sources or research.

17 Mr. Gutfreund is believed to be a source of some of the defamatory material  
18 disseminated by the defendants in the Illinois action.

19 PAGE 37:14-18:

20 Q. Did you meet Mr. Kornbluth?

21 A. Yes.

22 Q. Did you engage in any transaction with Mr. Kornbluth?

23 Ms. Alexander: Same objection.

24 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
25 the objection is arbitrary in that there is no discernible difference, in terms of the newsman's shield,  
26 between meeting Mr. Kornbluth and ever engaging in an unspecified transaction with him.

1 Moreover, the newsman's shield is inapplicable to the preparation of Mr. Pressman's book.

13

2 PAGE 38:12-14:

3 Q. Have you ever spoken with Cynthia Kisser?

4 Ms. Alexander: Same objection.

5 REASON WHY ANSWER SHOULD BE COMPELLED: Ms. Kisser is a named defendant in the  
6 Illinois action, and the witness's communications with Ms. Kisser may be of crucial importance to  
7 plaintiff's case, including the establishment of actual malice. Moreover, the question is unlimited as  
8 to time, and the objection is arbitrary in that the witness was allowed to testify about meeting Ms.  
9 Kisser, stating that he had never met her.

14

10 PAGE 39:9-15:

11 Q. When did you first become familiar with the name Cynthia Kisser?

12 Ms. Alexander: Same objection.

13 REASON WHY ANSWER SHOULD BE COMPELLED: Ms. Kisser is a named defendant in the  
14 Illinois action, and familiarity with a name does not reveal the witness's sources or research --  
15 assuming that the newsman's shield were applicable to the writing of Mr. Pressman's book, which it  
16 is not.

15

17 PAGE 40:6-14:

18 Q. Have you ever seen Cult Awareness Network's advertisement with respect to the  
19 materials they may have on groups they characterize as a cult?

20 Ms. Alexander: Same objection.

21 Q. Are you familiar with -- have you ever seen the Cult Awareness Network's  
advertisement on the Internet?

22 Ms. Alexander: Same objection.

23 REASON WHY ANSWER SHOULD BE COMPELLED: The question is foundational as to the  
24 witness's knowledge about information disseminated by a named defendant in the Illinois action. In  
25 addition, the question is unlimited as to time. The objection is also arbitrary and inconsistent,  
26 because at 39:16-25, the witness was allowed to testify concerning his reading of advertising

1 materials from the Cult Awareness Network.

16

2 PAGE 40:17-24:

3 Q. Have you ever met a person named Margaret Singer?

4 A. Yes.

5 Q. Have you ever spoken to Margaret Singer?

6 Ms. Alexander: Same objection.

7 Q. Have you ever read her works?

8 Ms. Alexander: Same objection.

9 REASON WHY ANSWER SHOULD BE COMPELLED: Unlimited as to time. The objection is  
10 arbitrary and inconsistent, in that the witness was allowed to testify that he had met Ms. Singer but  
11 not that he had ever spoken with her or read her works. The fact that he met Ms. Singer indicates  
12 that he must have communicated with her. Finally, the questions that are unanswered are not  
13 indicative of sources or research, assuming that the shield were applicable.

14 Ms. Singer is believed to be a source of defamatory information about Landmark that  
15 has been disseminated by the defendants in the Illinois action.

17

16 PAGE 42:3-43:2:

17 Q. Have you ever spoken to Wendy Drucker?

18 Ms. Alexander: Same objection.

19 Q. Have you met a person named Landon Carter?

20 A. Yes.

21 Q. Have you ever spoken to Landon Carter?

22 Ms. Alexander: Same objection

23 Q. Have you ever met Raz Ingrasci?

24 A. Yes.

25 Q. Have you ever spoken to Raz Ingrasci?

26 Ms. Alexander: Same objection.

1 Q. Have you ever met Irving Bernstein?  
A. Yes.

2 Q. Have you ever spoken to Irving Bernstein?

3 Ms. Alexander: Same objection.

4 REASON WHY ANSWERS SHOULD BE COMPELLED: The questions are unlimited as to time,  
5 and the objections are arbitrary and inconsistent with Mr. Pressman being allowed to testify about  
6 having met these people. Even if the newsman's shield were applicable, these questions are far too  
7 broad to reveal a source or research.

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8 PAGE 43:17-19:

9 Q. Do you recall telling (Sharon Spaulding) that you met members of the Erhard family?

10 Ms. Alexander: Same objection.

11  
12 REASON WHY ANSWER SHOULD BE COMPELLED: Even if the newsman's shield were  
13 applicable, a communication of the witness's information to others is outside the scope of the shield  
14 because the communication necessarily involves a disclosure and waiver of ostensibly protected  
15 material. Also, this question is unlimited as to time.

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16 PAGE 43:23-25:

17 Q. Have you written any letters to Stewart Esposito?

18 Ms. Alexander: Same objection.

19 REASON WHY ANSWER SHOULD BE COMPELLED: Even if the newsman's shield were  
20 applicable, a communication of the witness's information to others is outside the scope of the shield  
21 because the communication necessarily involves a disclosure and waiver of ostensibly protected  
22 material. Also, this question is unlimited as to time. Moreover, the objection is arbitrary and  
23 inconsistent because at page 35:19-36:1 the witness was allowed to testify about writing to  
24 Landmark, and Mr. Esposito has been a Landmark employee.

20

25 PAGE 45:5-9:

26 Q. Do you recall, in 1991, late 1991, early 1992, writing a series -- letters to people who

1 could best be characterized as being friends or family members of Werner Erhard?

2 Ms. Anderson: Same objection.

3 REASON WHY ANSWER SHOULD BE COMPELLED: Even if the newsman's shield were  
4 applicable, a communication by the witness to others is outside the scope of the shield because the  
5 communication necessarily involves disclosure of ostensibly protected material to others. Moreover,  
6 the objection is arbitrary and inconsistent because at page 35:19-36:1 the witness was allowed to  
7 testify about writing to Landmark, and Mr. Erhard was a source of the teaching technology used by  
8 Landmark.

9 PAGE 49:5-7:

10 Q. Are you familiar with a matter that might be called the Ney case?

11 Ms. Alexander: Same objection.

12 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
13 does not inquire into Mr. Pressman's sources or research for his book – assuming that the book were  
14 subject to the shield, which it is not.

15 Material from the Ney case is believed to be a source of information about Landmark  
16 that was disseminated by the defendants in the Illinois action.

17 PAGE 54:7-13:

18 Q. Had you ever attended an est session at any time?

19 Ms. Alexander: Same objection.

20 Q. Have you ever attended sessions of est and the Forum in such a way that you could  
21 compare how they operate?

22 Ms. Alexander: Same objection.

23 REASON WHY ANSWER SHOULD BE COMPELLED: The questions are unlimited as to time  
24 and the mere fact of attendance at seminars offered to the public does not disclose sources or  
25 research. Moreover, the newsman's shield is inapplicable to the writing of a book.

26 These questions pertain to seminars that are the subject of false and misleading

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1 information disseminated by the defendants in the Illinois action.

23  
2 PAGE 56:1-5:

3 Q. Was the article that you wrote on Scientology subsequent to an investigative period  
4 that you had done or research?

5 Ms. Alexander: Same objection.

6 REASON WHY ANSWER SHOULD BE COMPELLED: The question is foundational as to the  
7 extent of time that the newsman's shield could be applicable. (Here, unlike Mr. Pressman's book, a  
8 magazine article, concerning Scientology, was involved.)

24  
9 PAGE 59:17-23:

10 Q. In paragraph 3 [of Mr. Pressman's declaration in *Landmark Education Corporation*  
11 *v. Margaret Singer and Janja Lulich*, San Francisco Superior Court Case No. 976037] you say, No  
12 one at Landmark would agree to an interview or otherwise to provide me with information related to  
13 the book. Do you mean that no one at Landmark ever talked to you in any way about the manner in  
14 which Landmark conducted its business?

15 Ms. Alexander: Same objection.

16 REASON WHY ANSWER SHOULD BE COMPELLED: By presenting a sworn declaration to the  
17 court, and thereby interjecting himself into litigation, the witness has explicitly waived the shield in  
18 regard to the matters covered in the declaration. Where a newsman has entered into the litigation  
19 forum, the veracity of claims that he has put before the court is subject to discovery and he cannot  
20 hide behind the shield. *Dalitz v. Penthouse International, Ltd.* (1985) 168 Cal.App.3d 468, 480-  
21 481.

25  
22 PAGE 60:10-13; 62:20-63:8, 63:22-25:

23 Q. Did anyone at Landmark ever give you information about the subject matter of the  
24 Forum classes?

25 Ms. Alexander: Same objection.

26 Q. At any time, have you ever asked a question of a Landmark employee regarding the  
information in the book?

Ms. Alexander: Same objection.

Q. When you indicated in your declaration that no one would agree to an interview or

1 otherwise provide me with information related to the book, and then, as today, you explained that  
2 that meant an opportunity to ask a question, so I'm understanding where we are, did you, at any  
3 time – did you mean to infer to the court in this [declaration] that no one from Landmark ever  
4 answered a substantive question you had that was directed toward them?

5 Ms. Alexander: Same objection.

6 Q. Did anyone at Landmark ever answer any substantive question regarding – a question  
7 you may have asked regarding the Forum?

8 Ms. Alexander: Same Objection.

9 REASONS WHY ANSWERS SHOULD BE COMPELLED: By presenting this sworn declaration  
10 to the court, and thereby interjecting himself into litigation, the witness has explicitly waived the  
11 shield in regard to the matters covered in the declaration. Where a newsman has entered into the  
12 litigation forum, the veracity of claims that he has put before the court is subject to discovery and he  
13 cannot hide behind the shield. *Dalitz v. Penthouse International, Ltd.* (1985) 168 Cal.App.3d 468,  
14 480-481. Moreover, the objection is arbitrary and inconsistent, because the witness was allowed to  
15 testify that he received brochures from Landmark (page 57:14-18). Finally, the newsman's shield is  
16 inapplicable to the production of books.

17 PAGE 65:4-9:

18 Q. Did you ever meet Moden Kadavi?

19 Ms. Alexander: Same objection.

20 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
21 the objection is arbitrary and inconsistent because the witness had previously been allowed to answer  
22 questions about who he met.

23 Information obtained from Mr. Kadavi is believed to be a source of the defamatory  
24 information disseminated by the defendants in the Illinois action.

25 PAGE 66:16-22:

26 Q. Did you recall ever talking to Mike Salzman?

Ms. Alexander: Same objection.

Q. Are you aware that Michael Salzman represented Werner Erhard, as his lawyer, in a

1 tax case?

2 Ms. Alexander: Same objection.

3 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
4 the witness's awareness that Mr. Salzman was Mr. Erhard's attorney is extraneous to the scope of  
5 the shield, assuming that the shield were applicable.

6 Information relating to Mr. Erhard's taxes is included in the false and misleading  
7 information disseminated by the defendants in the Illinois action.

8 PAGE 67:14-16:

9 Q. Did you meet Mr. Ragland before or after the book you wrote?

10 Ms. Alexander: Same objection.

11 REASON WHY ANSWER SHOULD BE COMPELLED: The question is foundational as to time,  
12 assuming that the newsman's shield is applicable.

13 Mr. Ragland is believed to be a source of the false information about Landmark that  
14 was disseminated by the defendants in the Illinois action.

15 PAGE 68:12-14:

16 Q. Do you know whether or not you've ever spoken to Clair?

17 Ms. Alexander: Same objection.

18 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time;  
19 arbitrary and inconsistent in that the witness was allowed to answer whether he met Clair, one of  
20 Werner Erhard's children (page 68:8-11).

21 PAGE 68:15-17:

22 Q. Have you ever written to Werner Erhard?

23 Ms. Alexander: Same objection.

24 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
25 is arbitrary and inconsistent in that the witness was allowed to answer whether he had written to  
26 Landmark (page 35:19-36:1). Even if the shield were applicable, a communication by the witness to



1 others necessarily discloses ostensibly protected information and waives the shield.

2 PAGE 75:11-13:

3 Q. Have you ever visited the office of Cult Awareness Network?

4 Ms. Alexander. Same Objection

5 REASON WHY ANSWER SHOULD BE COMPELLED: The question is unlimited as to time, and  
6 even if the newsman's shield were applicable, the fact that the witness merely visited an office does  
7 not reveal sources or research. This question is relevant, because the Cult Awareness Network is a  
8 named defendant in the Illinois action.

9 DATED: October 2, 1997

ROPERS, MAJESKI, KOHN & BENTLEY

10  
11  
12 By Carol P. LaPlant  
13 CAROL P. LaPLANT  
14 Attorneys for Plaintiff  
15 LANDMARK EDUCATION CORPORATION  
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**EXHIBIT B**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION

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LANDMARK EDUCATION CORPORATION,  
Plaintiff,

vs.

No. 94 L 11478

CULT AWARENESS NETWORK, et al.,  
Defendants.

DEPOSITION OF STEVEN PRESSMAN

Taken before RALPH L. CISTARO

CSR No. 2087

Certified Shorthand Reporter

State of California

Thursday, June 5, 1997

Page 58

1 MR. LASSART: Q. Did someone at Landmark  
2 give you that?  
3 MS. ALEXANDER: Same objection.  
4 Asked and answered, actually.  
5 MR. LASSART: Let me get to that so we  
6 have -- we know exactly what it is I asked and  
7 answered.  
8 All right?  
9 MS. ALEXANDER: Okay.  
10 MR. LASSART: Q. Did anybody at Landmark  
11 provide you the brochures that you got?  
12 A. Not that I recall.  
13 Q. In your book you wrote that The Forum was  
14 a form of instruction.  
15 A. Was a form of what?  
16 Q. Instruction.  
17 Did you -- were you aware, and I'm  
18 just -- this is foundation, because I think we  
19 already covered this -- that it was a form of  
20 instruction that was provided by Landmark?  
21 [Ms. Alexander and the  
22 deponent confer off the  
23 record.]  
24 THE WITNESS: Yes.  
25 MR. LASSART: Q. Did any of the  
26 employees of Landmark, in any setting, provide you

Page 60

1 with information related to the book, was that an  
2 accurate statement?  
3 A. Yes.  
4 Q. In the book, you dealt with the manner in  
5 which --  
6 I'll withdraw that.  
7 In the book, you dealt with the subject  
8 matter which was taught in The Forum; is that right?  
9 A. Yes.  
10 Q. Did anyone at Landmark ever give you  
11 information about the subject matter of The Forum  
12 classes?  
13 MS. ALEXANDER: same objection.  
14 MR. LASSART: Q. When you indicated in  
15 the declaration that no one provided you with, quote,  
16 information related to the book, did you mean to  
17 infer to the court that you never got any information  
18 from anybody employed by Landmark about how The Forum  
19 was taught?  
20 [Ms. Alexander and the  
21 deponent confer off the  
22 record.]  
23 THE WITNESS: The declaration addresses  
24 itself to my requests for interviews to -- in order  
25 to ask direct questions of people associated -- of  
26 people employed by Landmark.

Page 59

1 information in -- as to what the -- how Landmark  
2 taught The Forum?  
3 [Ms. Alexander and the  
4 deponent confer off the  
5 record.]  
6 MS. ALEXANDER: Same objection.  
7 MR. LASSART: Q. Did someone at Landmark  
8 actually give you information concerning the way The  
9 Forum was taught?  
10 MS. ALEXANDER: Same objection.  
11 MR. LASSART: Q. When you use the  
12 phrase, or otherwise provide to me information --  
13 I'll withdraw that.  
14 When you use the phrase, No one at  
15 Landmark would -- let me give you the whole sentence,  
16 so it's in context.  
17 In paragraph three you say, No one at  
18 Landmark would agree to an interview or otherwise to  
19 provide me with information related to the book.  
20 Do you mean that no one at Landmark ever  
21 talked to you in any way about the manner in which  
22 Landmark conducted its -- its business?  
23 MS. ALEXANDER: Same objection.  
24 MR. LASSART: Q. When you say that no  
25 one provided you -- I want to paraphrase and then  
26 we'll get to the quote -- no one provided you, quote,

Page 61

1 MR. LASSART: Q. And your declaration  
2 addresses that: It says, "No one at Landmark would  
3 agree to an interview . . ."  
4 A. Correct.  
5 Q. And then you go on to say, quote, "or,"  
6 which is --  
7 Would you characterize that as a -- sort  
8 of another -- another method, after the "or," quote,  
9 or otherwise provide me with information related to  
10 the book?  
11 A. To me, it was an all-inclusive statement  
12 that referred to my direct requests for interviews.  
13 Q. So, in your declaration, when you use  
14 that sentence, you mean, on both sides of the "or,"  
15 interview?  
16 A. And/or, in some way, responses to  
17 questions of mine.  
18 Q. Is there, in the declaration, anywhere,  
19 besides this paragraph, in case I'm missing it, is  
20 there any -- any -- any indication in there that you  
21 were only referring to an opportunity by -- to  
22 receive information through some sort of an  
23 interrogatory by yourself, a direct reference to  
24 that?  
25 A. I -- I don't know.  
26 MS. ALEXANDER: I think the declaration

1 speaks for itself.  
 2 MR. LASSART: Q. Do you --  
 3 MS. ALEXANDER: I'm going to object to  
 4 the question.  
 5 MR. LASSART: Q. Do you recall, when you  
 6 represented this matter through the declaration --  
 7 I'll withdraw that.  
 8 With regard to that -- that particular  
 9 area, especially that sentence, when you -- when you  
 10 interview, do you only get information through the  
 11 result of inquiries?  
 12 MS. ALEXANDER: Same objection.  
 13 I'm also going to object to the whole  
 14 line of questioning on relevance grounds.  
 15 And I've let you have real leeway here,  
 16 Jim, but I don't see the relevance of any of these  
 17 questions to the subject matter of the lawsuit by  
 18 Landmark Education against Cult Awareness Network.  
 19 MR. LASSART: I -- I understand.  
 20 Q. At any time, did you have -- have you  
 21 ever asked a question of a Landmark employee  
 22 regarding the information in -- in the book?  
 23 MS. ALEXANDER: Same objection.  
 24 MR. LASSART: Q. When you indicated in  
 25 your declaration that no one would agree to an  
 26 interview or otherwise to provide me with information

1 don't we take a break. Let me go through some  
 2 material. I -- I mean, I'm going to compress this.  
 3 We're not -- . I want to make sure that I've covered  
 4 and got the privilege assertions on all the areas  
 5 where you want -- I know you want to assert them.  
 6 And I want to ask the questions.  
 7 All right?  
 8 THE WITNESS: Sure.  
 9 MR. LASSART: So, let's take a quick  
 10 break. Then I will go through.  
 11 THE VIDEOGRAPHER: This marks the end of  
 12 tape No. 1 in the deposition of Steven Pressman.  
 13 We are going off the record. The time is  
 14 3:08 p.m.  
 15 [Short recess.]  
 16 THE VIDEOGRAPHER: Back on the record.  
 17 Here marks the beginning of tape No. 2 in  
 18 the deposition of Steven Pressman.  
 19 The time is 3:33 p.m.  
 20 Please begin.  
 21 MR. LASSART: Q. Mr. Pressman, there's  
 22 some folks I'd like to see if you've met or recall  
 23 meeting.  
 24 Do you ever recall meeting a gentleman by  
 25 the name of John Hanley, H-a-n-l-e-y?  
 26 A. No.

1 related to the book, and then, as today, you  
 2 explained that that meant an opportunity to ask a  
 3 question, so I'm understanding where we are, did you,  
 4 at any time -- did you mean to v -- to infer to the  
 5 court in this that no one from Landmark ever answered  
 6 a substantive question you had that was directed  
 7 toward them?  
 8 MS. ALEXANDER: Same objection.  
 9 I think he's explained and re-explained  
 10 the context in which that statement was made.  
 11 MR. LASSART: Q. I know you've asserted  
 12 your privilege with regard to whether or not you've  
 13 ever attended a Forum meeting. I understand that.  
 14 But I want to have you think in context of that issue  
 15 of a Forum meeting. And I want to ask the question  
 16 just one time.  
 17 Did anyone at Landmark ever ask you --  
 18 answer a substantive question regarding The Forum?  
 19 MS. ALEXANDER: Could you repeat the  
 20 question, please?  
 21 MR. LASSART: Sure.  
 22 Q. Did anyone at Landmark ever answer any  
 23 substantive question regarding -- a question you may  
 24 have asked regarding The Forum?  
 25 MS. ALEXANDER: same objection.  
 26 MR. LASSART: I'll tell you what. Why

1 Q. Ever talked to or meet Moden Kadavi?  
 2 MS. ALEXANDER: If the question is ever  
 3 talk to or meet, then --  
 4 MR. LASSART: Q. Did you ever meet Moden  
 5 Kadavi?  
 6 [Ms. Alexander and the  
 7 deponent confer off the  
 8 record.]  
 9 MS. ALEXANDER: same objection.  
 10 MR. LASSART: Q. Do you know a person  
 11 named Jane Self?  
 12 A. No. Again, I -- I -- I know of her.  
 13 Q. Do you know whether or not Jane Self ever  
 14 wrote about you in her book?  
 15 A. I -- I'm -- I -- . Yes; I do know that  
 16 she did.  
 17 Q. Do you ever remember talking to Jane  
 18 Self --  
 19 MS. ALEXANDER: same objection.  
 20 MR. LASSART: Q. -- about her writing  
 21 about you in her book?  
 22 MS. ALEXANDER: I -- if that's the -- if  
 23 the question is about that, then I don't have the  
 24 objection.  
 25 THE WITNESS: And I'm sorry. Just --  
 26 MR. LASSART: Q. Do you ever --