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6 Attorneys for Defendant  
7 STEVEN PRESSMAN

ENDORSED  
FILED  
San Francisco County Superior Court

NOV 3 - 1997

ALAN CARLSON, Clerk  
BY: S. DOUGLAS  
Deputy Clerk

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

DECLARATION OF STEVEN  
PRESSMAN

Date: November 18, 1997

Time: 9:30 a.m.

Dept: 10, Room 414

17 I, Steven Pressman, declare as follows:

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19 1. I am the defendant in the above-entitled action. I have personal knowledge of  
20 the following matters, and if called as a witness could and would testify thereto.  
21

22 2. I am an editor and reporter presently employed by the San Francisco Daily  
23 Journal, a daily newspaper covering San Francisco Bay Area legal affairs, and California  
24 Lawyer, a monthly periodical covering California legal affairs.

25 3. I have been a journalist since graduating from college in 1977. That has been  
26 my sole occupation for the past 20 years. During that time I have been employed by the  
27 Orange City News, a small weekly newspaper in the city of Orange, California; the Los  
28 Angeles Daily Journal, a daily legal affairs newspaper; the Congressional Quarterly's Weekly

1 Report, a weekly news magazine covering congressional politics; and California Lawyer, the  
2 legal affairs publication distributed to all dues-paying members of the California bar. I am  
3 currently employed as an editor by the San Francisco Daily Journal, a daily legal affairs  
4 newspaper. I have also worked as a free-lance journalist during various periods in my career.

5 4. In early 1991, while employed by California Lawyer, I became interested in  
6 investigating and writing a book about Werner Erhard, the founder of a human-potential  
7 movement known as "est," which stood for Erhard Seminar Training. I conducted  
8 interviews, did research, and prepared a book proposal which led to a book contract with St.  
9 Martin's Press. All of the investigation, interviewing and research I did during this period  
10 concerning Werner Erhard, the Hunger Project, and/or Landmark Education Corporation was  
11 done with the intent of writing the book and/or articles for dissemination to the public.

12 5. During the period from 1991 to 1993 I devoted most of my efforts to  
13 investigation, interviews and research for, and the writing of, my book entitled Outrageous  
14 Betrayal, which was published in 1993. All of the investigation, interviewing and research I  
15 did during this period concerning Werner Erhard, the Hunger Project, and/or Landmark  
16 Education Corporation was done with the intent of writing the book and/or articles for  
17 dissemination to the public. While I was working on my book, I was also engaged in free-  
18 lance reporting for newspapers and magazines. During this period, for example, I wrote and  
19 published articles in California Lawyer magazine, the Legal Times newspaper and California  
20 Republic, a tabloid published at the time by the Daily Journal Corp. Some of these articles  
21 were based upon investigation, research and interviews done for the book. During 1991 and  
22 1992, I also served as senior editor and contributing writer for California Republic.

23 6. Following publication of my book, I continued to work as a free-lance  
24 journalist. During this period, for example, I wrote and published articles in California  
25 Lawyer magazine, the Los Angeles and San Francisco Daily Journal newspapers, the San  
26 Francisco Examiner newspaper, and Columbia Journalism Review.

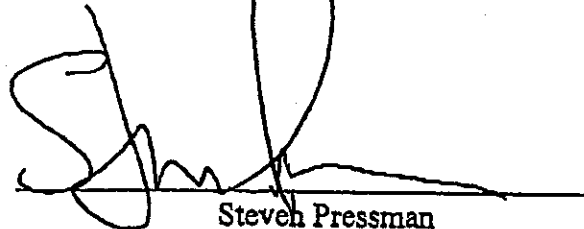
27 7. About three years ago, I was hired by the San Francisco Daily Journal as an  
28 editor, where I am now responsible for editing feature stories and a bi-weekly column.

1           8.       Other than what they may have read in my book, Outrageous Betrayal, I have  
2 never provided any information concerning est, The Forum, Werner Erhard, or Landmark  
3 Education Corporation to any of the named defendants in Landmark Education Corporation  
4 v. Cult Awareness Network, et al., filed in Cook County, Illinois (Action No. 94-L-11478),  
5 including the following: Cult Awareness Network, Cynthia Kissler, William Rehling, Cult  
6 Awareness Network New York / New Jersey n/k/a Cult Information Service, Inc.; or Cult  
7 Awareness Network North Texas n/k/a Free Minds of North Texas, Inc.

8           9.       During my deposition taken by Landmark Education Corporation on June 5,  
9 1997, in the case Landmark Education Corporation v. Cult Awareness Network, et al., I  
10 declined to answer a number of questions after consulting with and on instruction of my  
11 counsel, Judy Alexander. Ms. Alexander instructed me not to answer questions only when  
12 we determined that to supply an answer would reveal information about my news sources or  
13 about unpublished information obtained or prepared by me while newsgathering for  
14 dissemination of information to the public.

15           I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct. Executed this 3 day of November, 1997, at San  
17 Francisco, California.

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Steven Pressman