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10 Singer and Janja Lalich

ENDORSED
FILED
San Francisco County Superior Court

APR 15 1996

ALAN CARLSON, Clerk
BY: S. J. JUDICIALS
Deputy Clerk

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO

13 LANDMARK EDUCATION)
14 CORPORATION, a corporation,)
15 Plaintiff,)
16 vs.)
17 MARGARET THALER SINGER, an)
18 individual, JANJA LALICH, an individual,)
19 and DOES 1 through 100, inclusive,)
20 Defendants.)

Case No. 976037

DECLARATION OF JANJA LALICH
IN SUPPORT OF DEFENDANTS'
SPECIAL MOTION TO STRIKE
COMPLAINT
[C.C.P. § 425.16]

Date: May 1, 1996
Time: 9:30 a.m.
Place: Dept. 10, Room 414
Trial
Date: None

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1 I, Janja Lalich, state and declare:

2 1. I am a defendant in the above-entitled action and assisted Margaret
3 Thaler Singer in writing Cults in Our Midst: The Hidden Menace in Our Everyday Lives
4 (hereinafter the "Book"). I have personal knowledge of the matters set forth in this
5 declaration and could competently testify thereto if called as a witness.
6

7 **A. BACKGROUND**

8 1. I received a B.A. degree in French from the University of Wisconsin in
9 1967. I spent the following year as a Fulbright Scholar doing postgraduate research in Aix-
10 en-Provence, France.

11 2. I was a member of a political cult for more than ten years. Since I left
12 the group in 1986, I have devoted a substantial amount of my time to studying the cult
13 phenomenon and assisting people who have left or are trying to leave cults.
14

15 3. As a cult information specialist, I often work directly with families and
16 friends of people involved with cults. I also offer preventative-education workshops and
17 training seminars to campus, religious, civic and professional organizations.
18

19 4. In addition to working as a publishing and marketing consultant, I have
20 served as an editor and writer about the cult experience. I have written, lectured, and been
21 interviewed in the media about my personal cult experience, as well as cults in general. In
22 1993, a chapter authored by me entitled "A Little Carrot and a Lot of Stick" appeared in
23 Recovery from Cults: Help for Victims of Psychological and Spiritual Abuse (W.W.
24 Norton, 1993). In 1994, I co-wrote Captive Hearts, Captive Minds: Freedom and Recovery
25 from Cults and Abusive Relationships (Hunter House 1994). For three years, until
26 December 1995, I was associate editor of the *Cultic Studies Journal*.
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1 5. From about 1987 until December 1995, I also was an advisory board
2 member and research associate of the American Family Foundation, a tax-exempt research
3 and educational organization founded in 1979 to assist former cult members and their
4 families. In addition, I am coordinator and facilitator of a San Francisco Bay Area support
5 group for former cult members.
6

7 **B. THE BOOK**

8 1. I assisted Margaret Singer in writing Cults in Our Midst by providing
9 research and editorial support, as well as insights based on my own experience with and
10 study of cults and groups that use thought-reform techniques.
11

12 2. The Book is primarily based on the work of Dr. Singer during her fifty-
13 year career as an expert in group behavior and influence techniques. In gathering
14 information for the Book, we relied on her interviews and discussions with thousands of
15 current and former cult members and their relatives and friends, as well as with participants
16 in various training programs such as est and The Forum. We also relied on numerous
17 articles from academic journals that Dr. Singer previously had written and lectures she had
18 given, as well as other journal, newspaper, and magazine articles, among other things.
19

20 3. To complement what Dr. Singer had learned from her personal
21 interviews, I spent countless hours researching for the Book. I reviewed hundreds of
22 journals, newspaper and magazine articles as well as numerous books, videotapes, and
23 audiotapes about many of the groups that appear in our Book, including Landmark. Many
24 of these publications -- including articles from *Time* and *Newsweek* magazines, the *Los*
25 *Angeles Times*, the *New York Times*, and *The Wall Street Journal* -- are listed as sources in
26 the "Chapter Notes" section of our Book, starting on page 343.
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1 4. Dr. Singer and I also relied on documents directly generated by many
2 of the groups that are discussed in the Book. We often were able to obtain these materials
3 from current and former members of the groups. For example, we excerpted promotional
4 brochures distributed by The Forum and Transformational Technologies in order to
5 describe them in the "Intruding Into The Workplace" chapter of the Book.
6

7 5. Like Dr. Singer, I have been interested in and studied LGATs (large
8 group awareness trainings), and The Forum in particular. Between 1991 and the time that
9 I helped write the Book, I spoke to many reliable individuals about their experiences as
10 participants in est and/or The Forum. I believed these individuals to be honest and
11 forthright, and was not and am not aware that any of them had or have a particular bias
12 against Landmark or The Forum. The experiences shared by these individuals were
13 consistent with one another. Moreover, the information they provided was independently
14 corroborated by the many newspaper and magazine articles and books that I read about
15 Landmark and The Forum.
16

17 6. A brief discussion of The Forum (pages 202-204) was included in the
18 chapter of the Book that discusses LGATs and the workplace in order to provide our
19 readers with a proper historical perspective about LGATs. It would have been conspicuous
20 not to have discussed The Forum, because it is one of the largest and most popular LGATs
21 and has been the subject of numerous magazine and newspaper articles and discussed in
22 many books. I certainly harbor no ill-will against Landmark or The Forum, nor did I ever
23 hear Dr. Singer say anything that would suggest that she was out to "get" Landmark by
24 mentioning it in the Book.
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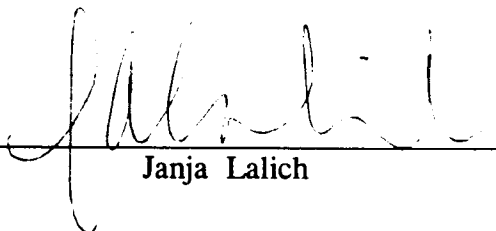
1 7. I never had any doubts about the truth of any statement in the Book,
2 including those that directly address Landmark and The Forum. The Book was carefully
3 researched and edited, and I believed our sources to be trustworthy and reliable. Dr.
4 Singer never expressed any doubts to me regarding the truth of the Book, the thoroughness
5 of our research, or the reliability of our sources.
6

7 8. Nor have I learned anything since the Book was published to create
8 any doubts about the truth of any part of the Book, including the few pages that discuss
9 The Forum.
10

11 9. I understand that Landmark claims in its Complaint that the mere
12 mention of The Forum in the Book allows for the attribution of any and all statements
13 regarding cults to Landmark. This was not our intention when writing Cults in Our Midst.
14 Passages that were meant to refer to a particular group -- including The Forum -- actually
15 mention that group by name. We also cautioned readers that they must judge each group
16 mentioned in the Book by its own behavior, and that not every group mentioned in the
17 Book is a cult. One of the principal objectives of the Book was to provide readers with the
18 analytical tools to critically evaluate whether a group or program they were thinking of
19 joining is a legitimate enterprise, or a dangerous organization that employs thought-reform
20 techniques associated with cults.
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22 I declare under penalty of perjury under the laws of the State of California
23 that the foregoing is true and correct. Executed this 15th day of April, 1996, at San
24 Francisco, California.
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Janja Lalich