
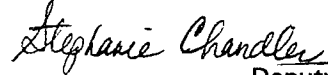


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 FILED-Central District  
SUPERIOR COURT  
SAN BERNARDINO COUNTY  
JUL 15 2008

5 Attorneys for Plaintiffs  
6 BENCHMARK YOUNG ADULT SCHOOL, INC.  
AND JAYNE LONGNECKER

By  Deputy

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN BERNARDINO, CENTRAL CIVIL DISTRICT  
10

11 BENCHMARK YOUNG ADULT SCHOOL, )  
12 INC., a California corporation; and JAYNE )  
13 LONGNECKER, an individual, )

CASE NO.: CIVSS 803920

DECLARATION OF SHERI ANNE MARTIN IN  
SUPPORT OF PLAINTIFFS' OPPOSITION TO  
SPECIAL MOTION TO STRIKE COMPLAINT  
PURSUANT TO CCP §425.16

14 Plaintiff,

15 v.

17 MICHAEL CRAWFORD, an individual; and )  
18 DOES 1 through 50, inclusive, )

19 Defendant.  
20

21 I, Sheri Ann Martin, declare as follows:

22 1. I am an employee of Plaintiff, Benchmark Young Adult School, Inc. ("BENCHMARK")

23 I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint  
24 Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and  
25 would testify to, the following facts:

26 2. I have been employed by BENCHMARK as a Resident Counselor/Life Coach for  
27 approximately six (6) years. In that capacity, my job duties include generally maintaining a healthy  
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12 INC., a California corporation; and JAYNE )  
LONGNECKER, an individual, )

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17 MICHAEL CRAWFORD, an individual; and )  
18 DOES 1 through 50, inclusive, )

19 Defendant. )  
20 )

CASE NO.: CIVSS 803920

**DECLARATION OF SHERI ANNE MARTIN IN  
SUPPORT OF PLAINTIFFS' OPPOSITION TO  
SPECIAL MOTION TO STRIKE COMPLAINT  
PURSUANT TO CCP §425.16**

21 I, Sheri Ann Martin , declare as follows:  
22

23 1. I am an employee of Plaintiff, Benchmark Young Adult School, Inc. ("BENCHMARK")

24 I make this declaration in support of Plaintiffs' Opposition To Special Motion To Strike Complaint  
25 Pursuant To CCP §425.16. I have personal knowledge of, and if called as a witness to testify could and  
26 would testify to, the following facts:

27 2. I have been employed by BENCHMARK as a Resident Counselor/Life Coach for  
28 approximately six (6) years. In that capacity, my job duties include generally maintaining a healthy

1 environment for the BENCHMARK students.

2 3. BENCHMARK maintains a residential facility (“RESIDENTIAL PROPERTY”) for  
3 BENCHMARK students on State Street in Redlands. For most of the BENCHMARK students, the  
4 RESIDENTIAL PROPERTY is their home. I am currently the BENCHMARK Weekend Supervisor  
5 for the RESIDENTIAL PROPERTY.

6 4. On Saturday, November 24, 2007, I was working at the RESIDENTIAL PROPERTY on  
7 my regular weekend schedule. I noticed Michael Crawford (“CRAWFORD”) close to the  
8 RESIDENTIAL PROPERTY. I knew who CRAWFORD was because he was a student at  
9 BENCHMARK when I first began working there several years ago.

10 5. When I first noticed CRAWFORD, he was sitting in a vehicle parked on the street by the  
11 RESIDENTIAL PROPERTY. I noticed that he was holding a video camera and appeared to be  
12 videotaping BENCHMARK students and staff. I left him alone.

13 6. Over the next several days, CRAWFORD appeared every day at the RESIDENTIAL  
14 PROPERTY. I personally saw and heard the actions CRAWFORD took over the next several days as  
15 he prevented BENCHMARK from conducting its day to day activities and interfered with  
16 BENCHMARK’s business, its relationship with its students, and the entire structure of the  
17 BENCHMARK program. Although I was not personally present earlier in the week, my understanding  
18 is that CRAWFORD began his activities on the Wednesday, November 21, 2007, the day prior to  
19 Thanksgiving.

20 7. During this time, CRAWFORD engaging in numerous activities that were extremely  
21 disruptive to the BENCHMARK students and staff and the entire structure of the BENCHMARK  
22 program. He was using a handheld video camera to record the students and staff without their  
23 permission. He was also constantly yelling derogatory statements about BENCHMARK, including  
24 yelling at and heckling students.

25 8. CRAWFORD was also actively soliciting BENCHMARK students to immediately leave  
26 the BENCHMARK program. As an example, CRAWFORD had a sign that indicated he would provide  
27 any student with a free bus ticket to anywhere in the United States and money for food if they would  
28 at that moment walk away from BENCHMARK.

1           9. On November 24, 2007, BENCHMARK staff contacted the police after I and others  
2 considered the extent of the disruption he was causing. The police came and spoke to CRAWFORD.  
3 They then told me that they had informed CRAWFORD that if he came onto BENCHMARK property  
4 he would be committing a trespass and that he was not permitted to use profanity.

5           10. Later that same evening, I was again at BENCHMARK RESIDENTIAL PROPERTY. At  
6 approximately 6:30 pm that evening, I watched as CRAWFORD was videotaping BENCHMARK  
7 students. One female student challenged why CRAWFORD was interfering with BENCHMARK. As  
8 CRAWFORD interacted with this student, she began to become more irritated at his actions. I came out  
9 to try to calm the situation down.

10           11. At that moment, I heard CRAWFORD cursing, yelling “Fuck you”, and “Fuck you,  
11 faggot”. Given the escalation of CRAWFORD’S verbal abuse I instructed BENCHMARK staff to call  
12 the Redlands Police Department. When the officer arrived he spoke with CRAWFORD, then he came  
13 in to let us know that CRAWFORD could not use profanity and had been instructed to leave.

14           12. On Sunday, November 25, 2007, in the evening, CRAWFORD again appeared at the  
15 RESIDENTIAL PROPERTY. He now had with him a student who lived at another location. I noticed  
16 that there was a disturbance outside involving CRAWFORD.

17           13. I attempted to have a conversation with CRAWFORD but CRAWFORD repeatedly yelled  
18 and demanded that I provide the student’s passport to him. I tried to explain to CRAWFORD that the  
19 student had a pending criminal matter that prohibited him from leaving San Bernardino. CRAWFORD  
20 insisted that the student was free to leave. The police were again contacted and came to the  
21 RESIDENTIAL PROPERTY.

22           14. The police discussed the situation with me and with CRAWFORD. They eventually advised  
23 CRAWFORD that he should leave. CRAWFORD did eventually leave. As he was leaving,  
24  
25  
26  
27  
28

1 CRAWFORD yelled out "I'll be back at Christmas".

2 15. I declare under penalty of perjury under the laws of the State of California that the  
3 foregoing is true and correct.

4 Executed on July 14, 2008 in Redlands, California.

5   
6 SHERI ANNE MARTIN

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