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*C. J. Kirk*  
FILED-Central District  
SUPERIOR COURT  
SAN BERNARDINO COUNTY

JUL 15 2008

BY *Stephanie Chandler*  
Deputy

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

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

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

CASE NO.: CIVSS 803920  
DECLARATION OF THOMAS J. CROKE IN  
SUPPORT OF PLAINTIFFS' OPPOSITION TO  
DEFENDANT'S SPECIAL MOTION TO STRIKE  
COMPLAINT PURSUANT TO CCP §425.16

13  
14 v. )  
15 )  
16 MICHAEL CRAWFORD, an individual; and )  
DOES 1 through 50, inclusive, )  
17 )  
Defendant. )

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19  
20 I, Thomas J. Croke, declare as follows:

21 1. I make this declaration in support of Plaintiffs' Opposition To Defendant's Special Motion  
22 To Strike Complaint Pursuant to CCP §425.16 ("Opposition"). I have personal knowledge of, and if  
23 called as a witness to testify could and would testify to, the following facts:

24 2. I am the President of Thomas J. Croke and Associates, Inc. ("TCA"). I have been the  
25 President of TCA for approximately eighteen (18) years. For the last fifteen (15) years, TCA has  
26 provided consulting services to parents of young people with behavioral and emotional problems.

27 3. I am a member of the Independent Educational Consultants Association ("IECA"). The  
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17 Defendant. )  
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1 IECA is the leading professional association of private educational consultants. IECA assists its  
2 members to effectively serve families in placements that include colleges, local day and boarding  
3 schools, schools or programs for students with learning or behavioral needs, international placements,  
4 summer opportunities, and graduate and professional schools.

5 4. I am aware that Benchmark Young Adult School (“Benchmark”) is a school for young  
6 people with behavioral and emotional problems. I have been aware of Benchmark for approximately  
7 fifteen (15) years and have previously recommended Benchmark as a placement.

8 5. On or about May 10, 2007, I received an unsolicited email from Michael Crawford with  
9 an email address of “psyborgue@mac.com” (the “Crawford Email”). A true and correct copy of the  
10 Crawford Email is attached as Exhibit – to the Opposition.

11 6. At the time I received the Crawford Email I was aware that Crawford had previously been  
12 a student at Benchmark who was now on a campaign to discredit and destroy Benchmark.

13 7. In the Crawford Email, Crawford made very specific accusations against both Benchmark  
14 and Jayne Longnecker. Specifically, Crawford wrote to me that: “There was a time when I thought that  
15 Benchmark would not stoop so low as to break the law. I was wrong. An investigator who looked into  
16 the police records for Benchmark’s residential component found no incidents whatsoever of suicide  
17 attempts or restraints, commonly known as “5150’s” at Benchmark. I have proof that this is not the  
18 case... Benchmark was willing to cover up the semi monthly suicide attempts. How? Both Jayne’s  
19 husband and son-in-law work for the Redlands Police Dept, as do several others in her family...”.

20 8. In reading the Crawford Email, I understood him to be making specific accusations and  
21 factual claims against Jayne Longnecker and Benchmark, including that semi- monthly suicide attempts  
22 had occurred at Benchmark, that Jayne Longnecker and Benchmark had engaged in criminal activity  
23 in concealing those semi-monthly suicide attempts and that Jayne Longnecker had been assisted in this  
24 criminal activity by her relatives.

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9. Although Crawford indicated in the Crawford email that he wanted me to contact him, I did not. I have not received any further communication from him.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and accurate.

Executed on June 25, 2008, at Greensburg, PA

Thomas J. Croke

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