

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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ALFRIEDA SLEE, ADMX OF THE ESTATE  
OF JACK SLEE,

Plaintiffs,

vs.

WERNER ERHARD, et al.,

Defendants.

COPY

Civil Action  
No. N-84-497-JAC

DEPOSITION OF MARGARET T. SINGER, Ph.D.

VOL. II

Taken before KAREN ALDERSON, a Certified  
Shorthand Reporter, License No. C-6279 and  
A Notary Public in and for the County of  
Contra Costa, State of California

July 22, 1987

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1 Q. Would you please list all the times that  
2 you've spoken for or on behalf or at the request of the  
3 Spiritual Counterfeits Project?

4 A. I remember another occasion sometime back  
5 where I was asked to talk to the group about cults and  
6 have no remembrance of when it was.

7 Q. None at all?

8 A. No, sir.

9 Q. Okay.

10 A. Several years back.

11 Q. So except for those two times, have you ever  
12 been invited to speak or did you ever speak for the  
13 Spiritual Counterfeit Project?

14 A. Yes, I remember a third time. They had a  
15 program in a church in Berkeley, and I was on that  
16 program.

17 Q. Okay, those are the three times that you've  
18 been on programs for the Spiritual Counterfeits Project?

19 A. That's all I can think of.

20 Q. When you spoke on any of those occasions, did  
21 you speak about therapy cults or psychotherapy cults?

22 A. No.

23 Q. What did you speak about?

24 A. The first time was about cults, the second  
25 speech was on psychopaths, and the third speech was on how  
26 to deal with threatening and menacing people in the  
27 office.

28 Q. Now have you made a distinction between the

1 word "cults" and the word "psychotherapy cults" or  
2 "therapy cults"?

3 A. Yes.

4 Q. Well, I know you have said previously that  
5 there are many different kinds of cults, but would you say  
6 that a psychotherapy cult is not a cult?

7 A. No, sir.

8 Q. So a psychotherapy cult would be a cult?

9 A. It is a division of the generic term "cult."

10 Q. So something which you say is a psychotherapy  
11 cult you would also say is a cult, is that correct?

12 A. Yes.

13 Q. You did not speak about cults on the three  
14 occasions that you spoke at the Spiritual Counterfeit  
15 Project?

16 A. I already testified that my first talk was on  
17 cults.

18 Q. I apologize, you did say that.

19 A. Uh-huh.

20 Q. Were you the only speaker in the first  
21 program that you have identified or were there other  
22 speakers?

23 A. There were other speakers.

24 Q. Do you know if a transcription was made of  
25 any of the three speeches you gave or addresses you gave  
26 at the Spiritual Counterfeit Project?

27 A. I don't believe so.

28 Q. At any one of those three occasions, were you

1 asked or did you offer that est, the est training, the est  
2 organization, or any programs of est, was a cult or a  
3 therapy cult or a psychotherapy cult?

4 A. No.

5 Q. Dr. Singer, have you ever been asked to  
6 address the Cult Awareness Network, formerly the Citizens  
7 Freedom Foundation? Okay, that's a question.

8 A. Yes.

9 Q. And did you?

10 A. Yes.

11 Q. How many times?

12 A. At the moment I can think of three times.

13 Q. And were you on the program alone or were you  
14 on with other people?

15 A. Other people.

16 Q. Have you ever made a presentation with Dr.  
17 Richard Offshee?

18 A. Yes.

19 Q. Was that a Cult Awareness Network event or a  
20 Spiritual Counterfeits Project event?

21 A. Yes.

22 Q. Which one, or both?

23 A. Only a Cult Awareness or Citizens Freedom  
24 Foundation meeting where we both were on the same program.

25 Q. Do you know if transcriptions were made of  
26 any of the lectures or speeches you gave at the Cult  
27 Awareness Network or Citizens Freedom Foundation?

28 A. I don't know.

1 Q. Did you ever tell anybody you did?

2 A. No, sir.

3 Q. Deprograming involves kidnapping, does it  
4 not?

5 A. No, sir.

6 Q. Never?

7 A. Well, it has.

8 Q. But that's nothing that you ever participated  
9 in or nothing you ever knew about?

10 A. I read the paper so I've known, but I've  
11 never participated in such.

12 Q. Fine. Now I asked you questions about a man  
13 named Hiam Crown and a woman named Miriam Tessa Glazer.  
14 Did I ask you any questions about the Committee on Cult  
15 Affairs in Israel? Do you have any connection with them  
16 or contact with them, communication from them or to them?

17 A. No, sir, just that.

18 Q. Only the request from Hiam Crown which you  
19 never responded to?

20 A. Which I never responded to.

21 Q. If Hiam Crown would have asked you if the est  
22 training or est organization was a cult of any sort, you  
23 would have said no, is that correct?

24 A. That's right.

25 Q. Sorry?

26 A. That's right.

27 Q. Okay.

28 A. It is not my opinion that it is a cult.