

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
LANDMARK EDUCATION CORPORATION, :
 :
 Plaintiff, :
 :
 -against- :
 :
 MARGARET THALER SINGER, an individual, :
 JANJA LALICH, an individual, :
 and DOES 1 through 100, inclusive :
 :
 Defendants. :
-----X

Index No.

96102797

COMPLAINT

Plaintiff, Landmark Education Corporation, by its attorneys,
for its complaint against the defendants, respectfully show the
Court and allege as follows:

I.

NATURE OF THE ACTION

1. This is an action for damages caused by defendants' publication of false and defamatory statements of and concerning plaintiff in the book "CULTS IN OUR MIDST - The Hidden Menace in Our Everyday Lives."

2. Jurisdiction and venue are based upon the residence of plaintiff which is authorized to do business in New York and maintains offices in New York in the State, County and City of New York, and upon the commission of tortious acts in the State, County and City of New York, which caused injury here, and upon the publication of the challenged material by defendants in the State, County and City of New York.

II.

PARTIES

3. Plaintiff Landmark Education Corporation ("Landmark") is

an employee-owned California corporation engaged in the business of making educational programs available to the general public, as well as communities, organizations and institutions, through its more than 40 offices worldwide. Landmark is authorized to business in New York and maintains offices at 425 Fifth Avenue, New York, New York 10021.

4. Defendant Margaret Thaler Singer ("Singer") is an individual and, upon information and belief, a resident of the County of Alameda, State of California. Singer is a clinical psychologist and university professor who authored and, upon information and belief, researched the book entitled CULTS IN OUR MIDST -- The Hidden Menace in Our Everyday Lives (the "Book") that was published February 15, 1995.

5. Defendant Janja Lalich ("Lalich") is an individual and, upon information and belief, a resident of the County of Alameda, State of California. Lalich co-authored and, upon information and belief, researched the Book.

6. The true names and capacities of those individuals and entities named herein as Does 1 through 100, inclusive, are unknown to plaintiff at this time. However, plaintiff is informed and believes, and thereon alleges, that each of said fictitiously named defendants is responsible in some manner for the event and occurrences herein alleged, or conspired in some manner with the named defendants and/or each other, and that plaintiff's damages as herein alleged were proximately caused by their conduct. Plaintiff will seek leave of court to amend this Complaint to state the true names and capacities of such fictitiously named defendants once

they have been ascertained.

GENERAL ALLEGATIONS

7. Landmark offers a four-part curriculum with the basic program being The Forum (the "Landmark Forum"). Landmark also offers advanced programs on various subjects including communication, time management and productivity.

8. The Landmark Forum is a program that takes place on three days and one evening in which participants are asked to examine the fundamental assumptions that shape their actions and may limit their freedom and effectiveness. Participants are given an opportunity to discover new possibilities for actions which may enhance their productivity, improve their relationships and achieve a greater degree of satisfaction. The Landmark Forum program focuses on giving participants an opportunity to develop their ability to use language effectively.

9. Since its introduction more than 400,000 people have participated in the Landmark Forum.

10. Participants in the Landmark Forum program are neither required nor requested to follow, embrace, or worship any theology, dogma or doctrine.

11. Participants in the Landmark Forum program are neither required nor requested to donate any of their assets to Landmark or any other entity, group or individual, nor would Landmark accept any such donation. Participants in the Landmark Forum program pay \$290 as tuition to Landmark for the full three day and one evening session.

12. Participants in the Landmark Forum program are not obligated to attempt to "recruit" other individuals to participate in programs offered by Landmark.

13. Participants in the Landmark Forum program are not subject to thought-reform techniques, mind control or manipulation, hypnotic techniques, brainwashing, psychological harm, blackmail, harassment, or violence or threats of violence.

14. Landmark does not engage in fraud and deceit to get participants into the Landmark Forum program.

15. Participants in the Forum program are not required or requested to cut themselves off, or isolate themselves, from their family and friends. Moreover, people who participate in the Landmark Forum sessions return to their homes between sessions in the same manner as if they were taking adult education courses at an urban college.

CAUSE OF ACTION
(Libel)
(Against All Defendants)

16. On or about February 15, 1995, defendants, and each of them, caused to be written, printed, published and disseminated a book entitled CULTS IN OUR MIDST - The Hidden Menace in Our Everyday Lives (the "Book"). A copy of the Book is annexed hereto as Exhibit "A" and made a part of this Complaint.

17. The false and defamatory statements made by defendants are of and concerning plaintiff. The Book's jacket (a copy of which is attached to the Book which is annexed hereto as Exhibit "A" and made part of this Complaint), beginning with the printing

of the words "CULTS IN OUR MIDST" on the jacket cover in bright red, and followed by the inside jacket cover description of the Book, clearly informs the reader that what will follow is "the definitive book on cults." The inside jacket cover also informs the reader that "Often a cult is disguised as a legitimate business or organization: ... a self-help group ... or leadership training program could be a front for a cult." The inside jacket cover states that "the definitive book on cults" to follow is authored by the "leading authority on cults," defendant Singer, and a "former cult member," defendant Lalich. The Book jacket highlights how the defendants will expose "what cults are" and "how they work."

18. The Book defines "cults" and "cultic-groups," specifically identifying their alleged characteristics, many specific cult groups and their founders and followers, and identifying alleged first-hand experiences of participants in cults. Examples of statements evidencing the definition and characteristics of a cult or cultic group provided in the Book include, but are not limited to, the false and defamatory statements listed in Paragraph 25 herein. The Book describes in numerous ways the overall deceptive nature of cults and cultic-groups and how they access many places in society, including the workplace, so as not to expose their true intentions. This overall description and the alleged numerous ways cults manifest themselves are all false in so far as they are of and concerning plaintiff.

19. It is in this context as a cult and a front for a cult that the Landmark Forum program is mentioned by name (the Forum) as

a large group awareness training group in Chapter 2 entitled, "A Brief History of Cults" under a subsection entitled "The 1970's: Cults to Expand Awareness (subsection) Large Group Awareness Training." In the same context, plaintiff and the Landmark Forum program are prominently mentioned in a number of false and defamatory statements in Chapter 8, entitled, "Intruding Into the Workplace," in a subsection entitled, "The Forum and Transformational Technologies." Besides containing false and defamatory statements mentioning the Landmark Forum by name (the Forum), reference to the Landmark Forum program in this chapter implies and was understood by the reading public to mean that the false and defamatory statements regarding the Book's definition and characteristics of cults and cultic-groups are of and concerning the plaintiff.

20. Chapter 8, entitled "Intruding into the Workplace," states that a significant portion of advancement programs, workshops, seminars and training sessions currently utilized by companies and corporations in the United States are not what they appear to be. Rather, they are "fronts for cults or other organizations using thought-reform processes" Chapter 8 describes programs which are sold under the "guise of management and communications courses" which purport to be able to motivate and even "transform" employees. Chapter 8 states that one of the reasons the book discusses these "programs" is to bring attention to the fact that certain "training programs" use the same types of intense influence techniques that are identified with cults and

that many "programs" are actually "recruiting venues" for certain cults. The Book states that, "Cults have put on three-piece suits and come directly into the workplace, disguised as self-improvement management courses."

21. Within a subsection of Chapter 8 entitled, "A Clash in the Workplace," the Book states that "Cultic programs that tend to be purely commercial ventures generally aim at selling more and more courses. . . . All these programs raise several general areas of concern: . . . They use thought-reform techniques and methods of psychological coercion and can cause psychological breakdown." This subsection also states that "The New Age movement business's desire to compete in the world marketplace, and our nation's propensity to believe in self-improvement are intermingling in our corporations. This situation is further complicated by the intrusion of certain cults and thought-reform groups that take advantage of this milieu."

22. Following this subsection within Chapter 8 is a section entitled "Violation of Civil Rights," which includes discussion of what Singer denominates as Large Group Awareness Training ("LGAT") programs and their "offshoots." The next subject subsection within Chapter 8 entitled "What Goes On in an LGAT," specifically mentions the Landmark Forum program (the Forum), describing it as having sponsored an LGAT. This same subsection of Chapter 8 then describes an LGAT session. The next subsections within Chapter 8 include, "Development of a New Age Training Program: A Case Example" and "Problems with Being Transformed at Work" (which

describes a number of "management courses" and cites specific examples of companies affected by the "issue").

23. Immediately following the above in Chapter 8 is the subsection entitled "The Forum and Transformational Technologies." The subsection contains numerous false and defamatory statements specifically mentioning and referring to the plaintiff and Landmark Forum (the Forum) using much of the same terminology used throughout the Book in defining what is a cult and its characteristics.

24. The implication, meaning and intent are obvious: that the false and defamatory statements in the Book regarding cults and their characteristics (cited in Paragraph 25 herein) are of and concerning the plaintiff.

25. Among the specific false and defamatory statements made by defendants of and concerning plaintiff in the Book are the following:

- (a) LGAT groups included est and its offshoots, such as ... the Forum . . . (Page 42)
- (b) . . . [Singer] attended six large group awareness training sessions (sponsored by ... the Forum . . .) (Page 191)
- (c) Around 1971 ... [est was established], which in 1985 reemerged as the Forum. . . . (Page 202)
- (d) In another region, at least one former employee filed a lawsuit against her employer claiming that she suffered a nervous breakdown as a result of a four-day course. (Page 202)
- (e) Here is what has happened at two companies using these programs. Ohio Children Services Agency. The Forum [seminar participants] complained of pressure to take the course and on-the-job discrimination against them if they didn't. (Page 204)

(f) DeKalb Farmers Market. Possibly one of the most celebrated cases related to workers' rights concluded with an out-of-court settlement reached between DeKalb Farmers Market and eight former employees who were allegedly fired or forced to resign for refusing to participate in Forum sessions....

The plaintiffs said that the training program's espousal of the supremacy of man violated their belief in the primacy of God or other higher beings. The lawsuit contended that supervisors who declined to participate and to recruit their employees were harassed, humiliated, and interrogated. The lawyer handling the case for the employees said that the case had "made employers come to grip with the legitimate boundaries of employee training."

Dong Shik Kim, one of the plaintiffs, worked at the DeKalb Farmers Market, a large produce market near Atlanta, Georgia. When his boss asked him to attend the special training seminar, Kim thought it would help him learn to increase sales and improve morale among fellow employees. Kim reported that the training sessions lasted as long as 15 hours and became a nightmare. The outside consultants who ran the program "bullied employees into tearful confessions about intimate and heart-wrenching episodes in their lives." Kim said, "The sessions put people into a hibernating state. They ask for total loyalty. It's like brainwashing."

Faced with staying in the program or losing his job, Kim quit. He and seven others sued the DeKalb Farmers Market and the consulting firm, claiming they were forced out of their jobs for objecting to a "new age quasi-religious cult." (Pages 203-205)

(g) As we have seen, coercive psychological influence may be operating in the workplace at the time an employee is assigned to attend certain training programs, and/or it may occur in the actual training program. Consequently, the psychological ramifications of some training programs have led to employees filing legal suits. Some of these suits were described in the previous section, and three additional cases are described here. (Page 207)

(h) Psychological Breakdown. (Page 208)

(i) Psychological Deterioration. (Page 208)

(j) Intense Psychological Stress . . . (page 209)

(k) . . . [a] significant portion of these programs ["workshops, seminars and training sessions"] are not what they appear to be. (Page 182)

(l) . . . they are fronts for cults or other organizations using thought-reform processes that can cause considerable psychological harm and turmoil and can even precipitate psychoses in some employees without delivering any . . . purported benefit. (Page 182)

(m) Sold under the guise of management and communication courses, these programs are . . . purported . . . to be able to "motivate" and even "transform" employees. (Page 183)

(n) . . . certain training programs use the same types of influence techniques that are identified with cults. (Page 183)

(o) Also, many of these programs are actually recruiting venues for certain cults. (Page 183)

(p) Cults have put on three-piece suits and come directly into the workplace, disguised as self-improvement management courses. (Page 183)

(q) Cult leaders and trainers assess individual participants in their seminars as potential recruits, already partially converted. (Page 187)

(r) All these programs raise several general areas of concern: . . . They use thought-reform techniques and methods of psychological coercion and . . . cause psychological breakdowns. (Page 187)

(s) This situation is further complicated by the intrusion of certain cults and thought-reform groups [into corporations] that take advantage of this milieu. (Page 188)

(t) Many aspects of New Age can be entertaining. . . as long as people don't get caught up with someone using these ventures to entrap them into a thought-reform group or a cult. . . (Pages 184, 185)

(u) They learn what the program is about only after it becomes difficult to leave. (Pages 210)

(v) . . . a number of cults are highly litigious . . . harass and curb critics . . . Their [cults] motivation . . . [is] to harass, financially destroy, and silence criticism. (Page XXIII) For these reasons I [Singer]

have elected to write generically of cults . . . names of groups have sometimes had to be omitted. (Page XXIV)

(w) . . . [The Book looks at] two main categories of groups. The first is made up of the cults and cultlike groups who expose their recruit members to organized psychological and social persuasion processes designed to produce attitudinal changes and to establish remarkable degrees of control by the group over these recruits' and members' lives. These cults deceive, manipulate and exploit their members and hope to keep them as for as long as possible.

The second category consists of commercially sold large group awareness training programs and other "self improvement" psychology-based, or miscellaneous organizations that use similar intense coordinated persuasion processes but . . . prefer adherents buy more courses . . . and bring in more customers . . . (Page 4)

(x) Thus, groups in both categories use thought-reform processes. (Page 4)

(y) These masterful manipulators Not every one of these groups meets the definition of a cult, but along with cults all of them use thought-reform techniques in recruiting, changing, and exploiting followers. (Page 4)

(z) . . . cultic groups are disguised as legitimate enterprises . . . self-help groups, business training workshops . . . (Page 5)

(aa) A cult can be formed around any content: . . . self-improvement techniques. . . the fastest-growing cultic groups . . . [are] New Age thinking and certain personal improvement training, life-styles, or prosperity programs. These latter cults are most likely to be the kind you or your friends may have come across or been influenced by (Page 13)

(ab) In the United States, there are at least ten major types of cults . . . 8. Psychology or psychotherapeutic . . . 10. Self-help, self-improvement, and life-style systems . . . (Page 13-14)

(ac) Other groups want to recruit members into their pay-as-you-go programs and therefore target employed persons with money-making skills, to whom the cults will sell "courses," gradually hooking these people into greater and greater commitment to the group, as well as selling them more and more expensive courses. (Page 22)

(ad) Courses used to lure people into cults have a wide range; . . . how to "get in control of your life," . . . (Page 23)

(ae) . . . a fifth class of victims [of cults]: those who have been in situations of enforced dependency (as I call them) as a consequence of having been subjected to thought-reform processes. In essence, a thought-reform program is a behavioral reconstruction program, a program of systematic manipulation using psychological and social techniques (see Chapter Three) . . . It is commonly known as brainwashing, and yes, it does exist. The cult member falls into this fifth class of victims. (Page 27)

(af) It was a natural progression for cultic groups and others using thought-reform techniques to add the psychological techniques from the sensitivity, encounter and group therapy movements into the behavioral change programs used for new members. Now gaining attention were groups like Charles Dederich's drug rehabilitation program, Synanon, and miscellaneous groups that provided the right mix of personal transformation and exotic undertones to attract followers. (Page 41)

(ag) Large Group Awareness Training.... They used encounter group and hypnotic techniques to destabilize participants' view [sic] of the world. Strong peer pressure was used to finish the job and produce conformity.... LGAT groups included ... the Forum. (Page 42)

(ah) Cults Threaten Legitimate Institutions ... A series of cultic groups has begun selling business management programs that rely heavily on intense influence techniques rather than skills training ... serve as avenues to increase the membership of the parent organizations. Some of these cultic groups use large group awareness training (LGAT) techniques (see Chapter Eight). . . . Most managers are not aware of the true nature of these training sessions because often the courses are sold by cult affiliates with a variety of names. . . . As mentioned, these programs, which are supposed to "transform" employees, usually are not skill-training courses but ways for the cult to get money and find new members. (Page 85)

(ai) . . . current cults and other groups using thought-reform processes induce attitude and behavior changes in their members, ... they use words to persuade, control, and even damage people. (Page XVIII)

(aj) [People are] . . . hoodwinked . . . gives up job,

family, and the freedom of self-determination . . . social and psychological influence techniques used by cults and cultic groups. This process of planned, covert, coordinated influence -- popularly called brainwashing or mind control or . . . thought reform -- is the route by which the cult leader gains control. (Page XXI)

(ak) Cults tend to be totalistic, or all-encompassing, in controlling their members' behavior and also ideologically totalistic, exhibiting zealotry and extremism in their worldview. . . . most cults expect members . . . [to give] a total commitment . . . to reach . . . "enlightenment." . . . The form of that commitment . . . more courses . . . more quotas . . . (Page 10)

(al) Cult leaders and con artists are opportunists . . . These manipulators survive because they adapt and because they are chameleon-like so at some times we get cults based on . . . business-training programs . . . relationship improvement seminars . . . (Page 50)

(am) The Process of Brainwashing, Psychological Coercion and Thought Reform. Leaders of cults and groups using thought-reform processes have taken in and controlled millions of persons to the detriment of their welfare. (Page 52).

(an) The following conditions create the atmosphere needed to put thought-reform processes into place. . . .
1. Keep the person unaware that there is an agenda to control or change the person
2. Control time and physical environment (contacts, information)
3. Create a sense of powerlessness, fear and dependency
4. Suppress old behavior and attitudes
5. Instill new behavior and attitudes
6. Put forth a closed system of logic (Page 64)

(ao) . . . cults are secret societies . . . [In groups that use thought-reform techniques there] is deliberate deception about what the group is and what some of the rituals might be, and primarily, there is deception about what the ultimate goal will be for a member, what will ultimately be demanded and expected, and what the damages resulting from some of the practices might be. . . . [Such techniques are] equivalent to mind control. (Page 99)

(ap) The psychotechnology of thought reform . . . is also not harmless . . . cult techniques of persuasion and control become more skillful, more subtle, and more damaging during the past two decades. (Page 102)

(aq) [Singer interviewed] . . . as many members of the new cultic groups as I could find . . . [These cults used] intense, well-packaged psychological and social control methods. (Page XVIII)

(ar) . . . cults achieve the control of people's lives that they appear to have. (Page XX)

(as) Eventually, these groups subject their followers to mind-numbing treatments that block critical and evaluative thinking and subjugate independent choice in a context of a strictly enforced hierarchy. (Page XXIII)

(at) Cult members . . . have been persuaded by each of these [Jim Jones and Koresh] and other groups to carry out group whims - including murder, suicide, and other violent acts - at the behest of the cult leader. (Page 3)

(au) The threat presented by cults . . . very real threats to public health, mental health, political power, and democratic freedoms . . . concerns over consumer issues (Page 5)

(av) . . . ordinary citizens leave their everyday lives and become part of groups that carry out acts ranging from bizarre and unethical to self-destructive and murderous. . . . no end to their unconscionable behavior . . . Cult members seem to have stamina almost beyond human comprehension. (Page 6)

(aw) A cultic relationship is one in which a person intentionally induces others to become totally or nearly totally dependent on him or her for almost all major life decisions, and inculcates in these followers a belief that he or she has some special talent, gift, or knowledge. (Page 7)

(ax) . . . cult refers to three factors: 1. The origin of the group and role of the leader 2. The power structure, or relationship between the leader (or leaders) and the followers 3. The use of a coordinated program of persuasion (which is called thought reform, or, more commonly, brainwashing) . . . (Page 7)

(ay) [Cult leaders] persuade devotees to drop their families, jobs, careers, and friends to follow them. Overtly or covertly, in most cases they eventually take over control of their followers' possessions, money, and lives. (Page 8)

(az) . . . spouses are forced to separate or parents

forced to give up their children as a test of their devotion to their leader. (Page 8)

(ba) Cults are authoritarian. The leader is regarded as the supreme authority. . . There is no appeal outside the leader's system to greater systems of justice. (Page 9)

(bb) . . . [Cults use] exploitative persuasion, that is various thought-reform processes used by cult leaders and cultlike groups to induce people to join, stay, and obey. (Page 10)

(bc) Many cults put great pressure on new members to leave their families, friends and jobs . . . (page 10)

(bd) But for all practical purposes these individuals [in cults] also live under rules governing such crucial features of their personal life as the people with whom they associate, what happens to their money, whether they raise their own children, and where they live. (Page 11)

(be) Cults are causing considerable damage to countless individuals and families in our society. Cults are using sophisticated psychological and social persuasion techniques to recruit and retain members. These techniques should be studied and revealed so that citizens can be taught countermeasures in order to avoid being exploited by such groups. Cults are using their wealth to curb fair criticism and comment through their threats of legal action and other intimidating actions. Cults represent encroachments of authoritarianism into our society under various guises, and this should be studied not only by behavioral scientists but also by ordinary citizens who care about their freedom. (Page 83)

(bf) Cults Harm Our Children and Tear Apart Our Families . . . Cults turn members against their families . . . (Page 87)

(bg) Cults Are Violent . . . Cults are abusive and destructive. . . . Some abuse only their own members; others project the violence outward. (Page 88)

(bh) Cults Engage in Conspiracy and Fraud . . . Not only have cultic groups engaged in openly violent behavior, but also . . . led to members' being convicted of crimes ranging from conspiracy to tax evasion, spying on governments and fraud. (Page 89)

(bi) Small Cults Can Be Just as Harmful as Large (Page 90)

(bj) Cults Take Away Our Freedom . . . They intentionally disrupt education and career goals, break up families, stifle personal relationships, and coerce followers into turning over savings, property and other assets. (Page 92)

(bk) Extraordinary Harassment. Those who criticize or oppose cults become accustomed to a plethora of harassing actions. They get phone calls from people posing as reporters, seeking information on local anti-cult activities. Neighbors, relatives, and employers are likely to get calls and visits, sometimes from fictitious persons on various pretext who accuse the anti-cult activist of all sorts of crimes. (Page 239).

(bl) [Singer's] office has been broken into and hundreds of video and audio interviews of ex-cult members and others have been stolen. (Page 242).

(bm) Each cult regards itself as above the laws of the land, as a sovereign state with its own superior rules, and in many cults, children are treated as though they were expendable. (Page 253)

(bn) . . . the cult's dishonesty about many things keeps members from knowing what is really going on. Members are not only kept from sources of outside information but are also told lies and misrepresentations about the cult, the leader, and the group's activities. (Page 274).

(bo) People don't leave cults [because] . . . they are afraid. Many groups chase after defectors. They threaten them, punish them, put them under house arrest. Members try to get away, they are stopped by the cult; they make the mistake of telling someone they are thinking of leaving, they are suspended from group activities, ostracized and punished. (Page 277)

(bp) . . . [cult members] stay because they are trapped by the same influences as the others, plus they feel enormous guilt and fear blackmail and retribution from the cult. (Page 278)

26. In the Book, by the use of the particular words set forth in Paragraph 25 above, defendants conveyed the following false and defamatory meanings of and concerning plaintiff:

(a) The Landmark Forum program engages in awareness training. The Landmark Forum program is an offshoot of est.

- (b) The Landmark Forum program sponsors awareness training sessions.
- (c) Est reemerged as the Landmark Forum program.
- (d) Plaintiff causes and caused the participants of the Landmark Forum program to suffer nervous breakdowns.
- (e) Plaintiff pressured employees of the Ohio Children Services agency to participate in the Landmark Forum program. Plaintiff caused employees of the Ohio Children Services Agency to suffer on the job discrimination if the Landmark Forum program was not taken.
- (f) Plaintiff engages in brainwashing. Plaintiff uses brainwashing on its participants in the Landmark Forum program. Plaintiff harasses those participants who do not stay in the Landmark Forum program. Plaintiff uses coercive psychological influence on the participants in the Landmark Forum program.
- (g) The plaintiff and/or the Landmark Forum program uses coercive psychological influence on participants in the Landmark Forum program.
- (h) Plaintiff and/or the Landmark Forum program causes psychological breakdown of the participants in the Landmark Forum.
- (i) Plaintiff and/or the Landmark Forum program causes psychological deterioration on the participants in the Landmark Forum program.
- (j) Plaintiff and/or the Landmark Forum program causes intense psychological stress to the participants in the Landmark Forum program.
- (k) The Landmark Forum program is not what it appears to be.
- (l) The Landmark Forum program is a front for a cult. The Landmark Forum program is a front for Landmark, an organization using thought-reform processes that causes considerable psychological harm. Plaintiff causes psychoses in participants of the Landmark Forum program.
- (m) Employers are unaware that plaintiff is a cult which hides that it is a cult from employers by making them think it is selling a management or communication course.
- (n) The Landmark Forum program uses the same influence techniques as a cult.

(o) The Landmark Forum is a recruiting venue for plaintiff.

(p) The Landmark Forum program is nothing more than a front for a cult which has disguised itself in the form of a self improvement management course to get into the workplace.

(q) Cult leaders and cult trainers assess participants in the Landmark Forum program as potential recruits for the cult. Plaintiff considers participants in the Landmark Forum program as already partially converted cult members.

(r) The Landmark Forum program uses thought-reform techniques and causes psychological breakdowns in participants.

(s) Plaintiff is a cult and thought-reform group that is entering corporations through self-improvement courses.

(t) The Landmark Forum program traps people into a cult or thought-reform group.

(u) Participants in the Landmark Forum program learn what the program is about only after the Landmark Forum program makes it difficult to leave. The Landmark Forum program makes it difficult for participants to discontinue the program. The Landmark Forum program attempts to prevent participants from leaving the program.

(v) Plaintiff is a cult. Plaintiff is a cult that is highly litigious whose motivation is to harass, curb and silence and financial destroy critics. Because plaintiff is a highly litigious cult which harasses and financially destroys critics the author of the Book, Singer, has in most places in the Book omitted the plaintiff's name or the name of the Landmark Forum program in an attempt not to get sued, harassed or destroyed by plaintiff.

(w) Plaintiff is a cult or cultlike group which exposes their recruit members to harmful psychological and social persuasion to control their lives. Plaintiff is a cult that deceives, manipulates and exploits its members and/or its participants in the Landmark Forum program. The Landmark Forum program is a LGAT that uses similar intense harmful persuasion process to cult or cultlike groups to get members to buy more courses and bring in more participants.

(x) The plaintiff and/or the Landmark Forum program uses

thought-reform processes.

(y) Plaintiff and/or the Landmark Forum program uses thought-reform techniques in recruiting and exploiting participants of the Landmark Forum program.

(z) Plaintiff is a cult disguised as a legitimate enterprise. The Landmark Forum program is a front for the plaintiff cult.

(aa) Plaintiff uses techniques which are part of the fastest-growing cultic groups.

(ab) Plaintiff is one of the ten major types of cults in the United States.

(ac) Plaintiff targets employed persons with money-making skills to sell courses to them to hook them into greater commitment to the cult.

(ad) Plaintiff uses the Landmark Forum program to lure people into the cult.

(ae) Plaintiff uses thought-reform processes on participants in the Landmark Forum program. Participants in the Landmark Forum program are exposed to harmful thought-reform processes, a behavioral reconstruction program, a program of systematic manipulation using harmful psychological and social techniques known as brainwashing.

(af) Plaintiff uses thought-reform techniques.

(ag) Plaintiff uses encounter groups. Plaintiff uses peer pressure to produce conformity in participants in the Landmark Forum program. Plaintiff uses hypnotic techniques on participants in the Landmark Forum program. Plaintiff's use of these techniques is in order to destabilize the participants' views of the world.

(ah) Plaintiff and/or the Landmark Forum program threaten legitimate institutions. The Landmark Forum program is sold by cult affiliates with a variety of names. The Landmark Forum program is merely a way for the plaintiff cult to find new members. Plaintiff is one of the cultic groups which has begun selling business management programs. Plaintiff is one of the cultic groups which sells business management programs that rely heavily on intense influence techniques.

(ai) The plaintiff uses words to control and damage participants in the Landmark Forum program.

(aj) Plaintiff tricks people into giving up their job, family and freedom. Plaintiff uses brainwashing and/or mind control and/or thought-reform to gain control of members for participants in the Landmark Forum program.

(ak) Plaintiff is totalistic and all encompassing in controlling the participants of the Landmark Forum program.

(al) Plaintiff is a cult based on a business training program. Plaintiff is made up of con-artists.

(am) Leaders of plaintiff have taken in and controlled persons to their detriment.

(an) Plaintiff keeps the participant in the Landmark Forum program unaware that plaintiff has an agenda to control and change them. Plaintiff creates a sense of powerlessness, fear and dependency in the participants of the Landmark Forum program.

(ao) Plaintiff is a secret society which uses thought-reform techniques. Plaintiff uses deliberate deception on participants in the Landmark Forum program about what the group is. Plaintiff uses deception about what the ultimate goal of the Landmark Forum program is for a participant and what will ultimately be demanded and expected, and what the damages from their program will be. Plaintiff uses mind control techniques on participants in the Landmark Forum program.

(ap) Plaintiff uses harmful cult techniques to control participants in the Landmark Forum program.

(aq) Landmark uses psychological social control methods on participants in the Landmark Forum Program.

(ar) Landmark controls the lives of the participants in the Landmark Forum program.

(as) Landmark subjects participants in the Landmark Forum program to mind-numbing treatments that block critical evaluative thinking.

(at) Plaintiff has persuaded participants in the Landmark Forum program or other individuals to carry out the whim of plaintiff, such as murder, suicide and other violent acts.

(au) Plaintiff and/or the Landmark Forum program threatens public health, mental health and democracy.

(av) Plaintiff encourages people to commit bizarre, unethical, self-destructive and murderous acts.

(aw) Plaintiff induces participants in the Landmark Forum program to become totally dependent on them for all major life decisions.

(ax) Plaintiff engages in a coordinated program of thought-reform also known as brainwashing. The Landmark Forum program engages in brainwashing.

(ay) Plaintiff persuades participants in the Landmark Forum program to leave their families, jobs, careers and friends to follow plaintiff. Plaintiff overtly and covertly takes control of the possessions and money of the participants in the Landmark Forum program.

(az) Plaintiff forces participants in the Landmark Forum program to separate from their spouses and/or give up their children as a test of their devotion.

(ba) Plaintiff is authoritarian. Plaintiff's leader is regarded as a God.

(bb) Plaintiff and/or the Landmark Forum program uses thought-reform processes to induce people to join, stay and obey.

(bc) Plaintiff and/or the Landmark Forum program puts pressure on participants in the Landmark Forum program to leave their families, friends and jobs.

(bd) Participants in the Landmark Forum program are controlled by plaintiff as to whom they should associate with, what happens to their money, whether they raise their own children and where to live.

(be) Plaintiff and/or the Landmark Forum program causes considerable damage to countless individuals and families. Plaintiff baselessly threatens legal action and uses other intimidating action to curb fair criticism.

(bf) Plaintiff and/or the Landmark Forum program harms children. Plaintiff turns participants of the Landmark Forum program against their families.

(bg) Plaintiff and/or the Landmark Forum program is violent, abusive and destructive. Plaintiff abuses participants in the Landmark Forum program.

(bh) Plaintiff engages in fraud and deceit. Plaintiff

engages in openly violent behavior which has led to members being convicted of crimes, ranging from conspiracy to tax evasion, spying on governments and fraud.

(bi) Plaintiff is a harmful cult.

(bj) Plaintiff takes away the freedom of the participants in the Landmark Forum program. Plaintiff disrupts education and career goals of participants of the Landmark Forum program. Plaintiff breaks up the families or participants of the Landmark Forum program. Plaintiff coerces people and participants of the Landmark Forum program into turning over their savings, property and other assets to plaintiff.

(bk) Plaintiff harasses critics of the Landmark Forum program. Plaintiff harasses critics of plaintiff.

(bl) Plaintiff engages in crime against those who criticize it or the Landmark Forum program. Plaintiff was involved in breaking into author Singer's office and stealing video and audio materials.

(bm) Plaintiff regards itself as above the laws of the United States. Plaintiff regards itself a sovereign state with its own rules and laws.

(bn) Plaintiff is dishonest to participants in the Landmark Forum program. Plaintiff lies to participants in the Landmark Forum program as to its true intentions.

(bo) Plaintiff harasses participants who leave the Landmark Forum program. Plaintiff threatens former Forum program participants and puts them under house arrest.

(bp) Participants stay in the Landmark Forum program because they fear blackmail and retribution from plaintiff.

27. Although plaintiff has presented above the most serious and most harmful false and defamatory statements of and concerning plaintiff, all statements in the Book of and concerning plaintiff are false.

28. The false and defamatory meanings and implications of and concerning plaintiff alleged in Paragraph 26 were also conveyed by

the combination of individual statements contained in the Book, including the juxtaposition of words and statements to each other, which, in the aggregate, produced the false and defamatory inferences from which said meanings and implications were conveyed.

29. Defendants knew and intended that the particular statements set forth in Paragraph 25 and in the Book as a whole (Exhibit "A") would convey each and every false and defamatory meaning and implication set forth in Paragraph 26 of and concerning plaintiff and that such false and defamatory meanings were conveyed by the particular statements set forth in Paragraph 25 and by the inferences drawn from the Book's statements in the aggregate.

30. Defendants' publication of the Book was made with actual malice in that the defendants knew that the aforesaid defamatory statements, implications and meanings of and concerning the plaintiff were false and published them or caused them to be published in reckless disregard of their truth or falsity.

31. The aforesaid defamatory statements and meanings were published or caused to be published by defendants acting in a grossly irresponsible manner.

32. The aforesaid defamatory statements and meanings were published or caused to be published by defendants acting in a negligent manner.

33. The publication of the Book as described herein was accomplished by means which radically departed from responsible journalistic standards and practices.

34. That the above false and defamatory statements of the

Book were intended to be and are of and concerning the plaintiff and were made with common law malice and actual malice is obvious from the "Resources and Organizations" and the "Acknowledgments" Sections of the Book in which author Singer states she: "could never have accomplished so much without all the assistance [of] ... the Cult Awareness Network - their enthusiastic support and help in providing referrals, locating source materials, supplying literature and reprints of articles and sponsoring annual conferences that bring together so many people who are interested in this social problem." The Cult Awareness Network ("CAN") has attacked and negatively presented the Plaintiff and the Landmark Forum. Defendant knew of the extreme hostility of CAN towards Plaintiff.

35. By reason of the aforesaid acts of defendants, plaintiff has been held up to public disgrace, scorned and ridiculed, has been seriously injured in its business and will be further injured in its business in the future, has suffered grave and permanent impairment of its reputation and standing in the adult education community and with the general public, and has otherwise been injured in its good name, fame and reputation.

36. As a direct result of the aforesaid acts of defendants, plaintiff has been economically damaged. Upon information and belief, the Book is widely sold in major bookstores (e.g., Barnes and Noble), and is read and used as a source of reference by those who will conclude based on the false and defamatory statements of and concerning the plaintiff that plaintiff is a dangerous cult and

that the Landmark Forum program is a front for a dangerous cult. Upon information and belief, the Book is sold all over the world by the Cult Awareness Network and is used to discourage people from taking the Landmark Forum program. Upon information and belief, the authors are distributing the Book throughout the United States for the purpose of discouraging people from participating in the Landmark Forum program. Upon information and belief, individuals and businesses have been discouraged from participating in the Landmark Forum program by the defamation of and concerning the plaintiff in the Book.

37. As the acts of defendants were committed with malice, fraud and oppression and with intent to harm and destroy plaintiff, defendants are also liable for the payment of punitive damages.

WHEREFORE, plaintiff Landmark Education Corporation demands judgment against defendants as follows:

- (1) In an amount no less than \$10,000,000 in general damages together with interest thereon;
- (2) For punitive damages in an amount to be proven at trial;
- (3) For the costs and disbursements in this action including reasonable allowances for counsel fees and other lawful expenses; and

(4) For such other and further relief as the Court may find just and proper under the circumstances.

Dated: February 13, 1996

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