Sent By: KIMBERLY#A#8TOVALL#AND#A66OC; 9727740733; OCT-29-98 6:0

## CAUSE NO. 97-00933-I

TRACY NEFF, Plaintiff

IN THE DISTRICT COURT

vė.

DALLAS COUNTY, TEXAS

LANDMARK EDUCATION
CORPORATION AND DAVID GRILL,
AN INDIVIDUAL,
Defendants

162 JUDICIAL DISTRICT

## AFFIDAVIT OF JOEL BROCKNER, Ph.D.

COMES NOW Joel Brockner, Ph.D., who deposes and approd as follows:

"My name is Joel Brockner, Ph.D. I am of sound mind, am over the age of eighteen (18), and have never been convicted of a felony or a crime of moral turpitude. The statements in this affidavit are made upon my personal knowledge and are true and correct.

"I am a Full Professor of Management at the Craduate School of Business of Columbia University. My office address is Graduate School of Business, Columbia University, New York, New York 10027. I graduated from the State University of New York at Stony Brook with a Bachelor of Arts in psychology in May of 1972. Thereafter, in November of 1974 I received a Master of Science with an emphasis in Personality and Social Psychology from Tufts University. I received my Ph.D. in Psychology from Tufts in May of 1977.

"Since the time of my graduation from Tufta University with a Ph.D. in psychology in May of 1977, I have continuously taught Psychology or Management at the college level, first at Middlebury "Iniversity, then at the State University of New York at Brockport, New York, then at Tufts University, then at the University of Arizona at Tucson. I have been teaching Management at Columbia University since 1984.

"My primary field of knowledge and study deals with organizational behavior and managerial decision making. My particular field of expectise is in management strategy and work place factors as they affect employees. I have done extensive work in the field of private sector consultation on managing personnel for fortune 500 companies such as AT&T, IBM and Eastman Kodak. A true and correct copy of my current curriculum vitae is attached hereto as Exhibit "A". Further, I have done extensive scientific research and behavioral studies, as well as case studies of individuals, in the area of determining what individual psychological factors combined with what workplace factors will influence or determine a particular outcome in the workplace.

AFFIDAVIT OF JOEL BROCKNER - Page 1

"I have reviewed the personnel file maintained by Landmark Education Corporation relating to David Grill which was produced to the Plaintiff's counsel in this case. I have also reviewed the depositions taken of Tracy Neff, Mindy Dodson and Patricia Dillon taken in this case. Further, I have reviewed the criminal records relating to David Alan Grill. In my professional opinion, I have reviewed enough information to draw certain conclusions about the management sty e, strategy and effectiveness of management decisions of Landmark Education Corporation with regard to its Dallas Center manager, David Grill, during the period of his employment. Such reviews are routinely done by professors of management as case studies and in conjunction with research and private-sector consulting. I have followed the usual and generally accepted scientific method in my field with regard to the conclusions expressed in this affidavit.

"I have concluded that Landmark Education Corporation was negligent and grossly negligent in its management of David Alan Grill, by failing to assess his problem behaviors surrounding interaction with women, alcoholism, drug use, erratic behavior, dating program participants in the Landmark seminars, sexual inappropriateness and his violent temper. Further, I have concluded that the failure of Landmark Education Corporation to properly assess Mr. Grill's problems both in his personal life and in the work place, was a proximate cause of the sexual assault of Tracy Neff on February 3, 1995. My conclusion is based on the fact that, if management had properly dealt with Mr. Grill, he would not have had the opportunity to come into contact with persons who were program participants, such as Ms. Neff.

"Further, based upon my review of records, my education, training and experience, and the research I have done in accordance with the scientific methods common in my field, it is my professional opinion that Landmark Education Corporation had ample reason to foresee that Mr. Grill was likely to engage in behavior that was calculated to bring discredit to Lundmark Education. Corporation and would be in disregard for the rights and duties he owed to others. Further, based on Mr. Grill's past history, Landmark could reasonably have foreseen that Mr. Grill would engage in inappropriate and dangerous behavior involving one or more of the following factors: (a) a female participant or graduate of the Landmark programs, (b) abuse of alcohol, (c) sexually inappropriate behavior, (d) sexual harassment, (e) violent outbursts, (f) assaultive behavior, (g) sexual harassment, and/or (h) drugs.

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"Further Affiant Sayoth Not."

Soel Brocker, Ph.D., Affiant

on the 30 day of OCHOEL . 1988.

NOTAR PUBLIC in and tor the State of The WYORK

MiCHAEL AIRO
Notani Public, State of New York
No. 01AIS017081
Qualified in Westchester County
Commission Expires August 30.

AFFIDAVIT OF JOEL BROCKNER - Page 3

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CAUSE NO. 97-00933-T

TRACY NEFF, Plaintiff

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LANDMARK EDUCATION
CORPORATION AND DAVID GRILL,
AN INDIVIDUAL,
Defendants

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

162" JUDICIAL DISTRICT

# AFFIDAVIT OF RICK ROSS

COMES NOW Rick Ross, who deposes and stated as follows:

"My name is Rick Ross. I am of sound mind, am over the age of eighteen. The statements in this affidavit are made upon my personal knowledge and are true and correct.

"Since 1986, I have been employed as a private consultant, lecturer and intervention specialist regarding destructive cults, radical, controversial and potentially unsafe groups. In this context, I work with families, mental health professionals, attorneys, clergy, members of law enforcement and the media specifically with regard to individuals who have come under some type of undue influence. My work since 1982 has been focused on researching groups with evidence of a group dynamic and/or philosophy that often creates a type of leatned dependency. That is, participants are unduly influenced to follow the directions and solutions of the group and become dependent upon them.

"I have identified and/or interviewed numerous individuals who have participated in programs presented by the Landmark Education Corporation, including persons who have done the Forum, persons who have been volunteers and/or associated with the company. Further, I have reviewed the personnel file of David Crill, and deposition testimony of Tracy Neff taken in this case.

"There is a phenomenon described by mental health professionals as the "transference phenomenon." Essentially, this transference phenomenon is the process in which patients develop trust and transfer feelings and perceptions they have had in past relationships, such as with parents, to their therapist. An imbalance of power develops due to the inherent dependent nature of this relationship. That is, the patient looks to the therapist for help, guidance and critical analysis and becomes extraordinarily vulnerable to their suggestions and/or influence.

AFFIDAVIT OF RICK ROSS - Page 1 stdleovery molitical stdleaver

Oct-30-\_\_ 11:28AM:

Sent By: KIMBERLY#A#STOVALL#AND#ASSOC; 9727740733;

> "Although Landmark Education denics that it is therapy, it is nevertheless a type of intensive group encounter. Within the context of such an intensive encounter and through continued courses. Landmark leaders and facilitators essentially occupy a role similar to that of a therapist and/or group encounter facilitator. A type of transference is encouraged within their encounter process that engenders trust by design. Landmark therefore has an inherent responsibility to carefully choose and supervise its designated leaders and be sensitive to airy complaints.

> "An imbalance of power developed in the relationship between Tracy Neff and David Grill, such that David Grill was able to manipulate and exercise undue influence over Tracy Neff. Further, this type of trust and dependence was due to the fact that David Grill occupied a position of leadership and authority within Landmark Education Corporation and because Tracy Neff was specifically influenced - - again by design - through the programs presented by Landmark in which she was enrolled.

> "The munipulation of Tracy Neff by David Grill, which was facilitated and continually strengthened by his position within Landmark Education Corporation, was a proximate cause of the sexual assault of Tracy Neff on February 3, 1997. Further, because Landmark Education Corporation is imminently familiar with its own programs, it should have reasonably foreseen that this transference phenomenon could develop around its leaders, such as David Grill.

"Further Affiant Sayeth Not."

Rick Ross, Affiant

SWORN TO AND SUBSCRIBED before me by Rick Ri

un the 30th day of Octo

C in and for the Blace of Maryland

MICHAEL I. TEARE MY COMMISSION EXPIRES

04/15/2001

AFFIDAVIT OF RICK ROSS - PAGE 2 S:\dispovery\nellus\afficavil

## CAUSE NO. 97-00933-I

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TRACY NEFF

vs.

\* IN THE DISTRICT COURT \*

DALLAS COUNTY, TEXAS

LANDMARK EDUCATION CORPORATION AND DAVID GRILL, AN INDIVIDUAL

162ND JUDICIAL DISTRICT

VIDEOTAPED ORAL DEPOSITION OF ARTHUR H. SCHREIBER

a witness produced on behalf of the Plaintiff, taken in the above styled and numbered cause on the 23rd day of October, 1998, before Kay D. Gallivan, a Certified Shorthand Reporter in and for the State of Texas, taken in the offices of Gwinn & Roby, 4100 Renaissance Tower, 1201 Elm Street, City of Dallas, County of Dallas, State of Texas, pursuant to the Texas Rules of Civil Procedure.

COPY

KAY D. GALLIVAN & ASSOCIATES

(214) 827-1385

# ATTORNEYS OF RECORD

#### APPEARANCES:

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LANDMARK EDUCATION CORPORATION

ALSO PRESENT: MR. STEVEN ZAPILER
ATTORNEY AT LAW

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PHONE: (214) 651-1121
COUNSEL FOR THE DEFENDANT,
DAVID GRILL

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the EST program from June of '81 to December of '84 and then delivered The Forum and other programs related to The Forum from January 1985 until -- from -- sorry -- from January 1985 until January of 1991. They're programs that essentially have people -- allow people to be more effective in their lives but from a very different place. So in the answer to your question about Werner Erhard & Associates, yes, they -- they offered programs that had people be more effective, but they offered two very different types of programs.

- Q. How are they so different?
- A. The whole thrust and philosophy of the EST training and related programs is very different than the -- The Forum and the programs relating to The Forum.
  - Q. How so?
- A. Well, one could say -- first of all, The Forum -- in language you would understand, The Forum is more like a -- an inquiry that would be conducted in law school except it's not about contracts and trusts and estates. It's about issues that are of -- that are of concern to people in life, like what it -- what does it mean to be responsible. And one would conduct an inquiry in

program that was about altering my ability to experience, I come out in one direction. If I do a three day and one evening program that's not about my experience at all, that we're not even interested in how you experience life, but we're interested in have you seeing that there are certain areas in your life where you can create new possibilities for yourself that didn't otherwise exist, I come out through a very different door.

Now, when I'm -- when the two of those people are outside and you ask what kind of umbrella would I put over them, I say loosely they're programs to have people be more effective; but they're going down very different tunnels.

- O. What is The Forum?
- A. The Forum is our basic educational program.
  - Q. What is the purpose of The Forum?
- are a number of -- I mean, there isn't like a stated purpose, but the purpose of The Forum is to have people who are healthy and successful and well have opportunities for themselves to -- to see and create for themselves new possibilities for action in any or all parts of their lives that they might

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1	speak with the center manager to get information?
2	A. Sure. There's nothing I mean, I'm
3	only saying the registrar because that's the person
. 4	in whose job responsibility this would fall. But
5	if he's on vacation for two weeks, they wouldn't
6	just leave a message so
7	Q. All right. You mentioned that that
8	there is a new Forum Information Form and one of
9	the changes to it is that there is an arbitration
10	agreement.
11	A. Uh-huh.

- Uh-huh.
- Does -- who does the arbitrations under that agreement?
- A. The office of the American Arbitration Association in the city in which The Forum is being delivered.
- Have any arbitrations been performed pursuant to the arbitration agreement since the form was revised?

  - You mentioned that there was Dr. Edward Lowell --
    - Uh-huh.
  - -- who has served as a mental health advisor --

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A. Uh-huh.

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- Q. -- to Landmark Education Corporation.
- A. Unpaid advisor, that's correct.
- Q. All right. Are there any other paid or unpaid mental health professionals that have served as advisors to Landmark Education Corporation?
- A. There have never been any paid advisors, and there have been unpaid advisors; and over the years, the names I don't recall. Doctor Lowell I definitely know about.
- Q. Why is it that Landmark Education

  Corporation has determined based on advice from

  mental health professionals that persons who answer

  "yes" to the questions on that form should not

  participate in The Forum?
- people in this -- right in their application form -- and I'm reading from the form. "The Landmark Forum is intended for people who are well. In the program you will address such questions as, 'What does it mean to be human' and 'What is the possibility of being for human beings.' Although most people find these matters engaging, challenging, and rewarding, some may find thinking about such matters difficult and

unsettling. As with any serious undertaking in life, you should take the time to determine whether or not you are physically, mentally and emotionally prepared to engage in these kinds of questions.

The program is not therapeutic in design, intent or methodology and is not a substitute for psychotherapy or for a drug or alcohol treatment program. Because some people may, contrary to our specific instructions, take the program as a way of dealing with issues that are properly addressed by trained mental health professionals, we advise you that The Forum leaders are not trained mental health professionals; that no trained mental health professionals will be in attendance at The Forum; and that The Forum will not address issues that are best dealt with in therapy."

I couldn't say it any better to answer your question.

MS. STOVALL: I'll object as

nonresponsive.

Q. (By Ms. Stovall) And maybe I didn't ask the question. Let me try it again. What is it about The Forum, the activities that occur in The Forum --

A. Uh-huh.

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- Q. -- and 1 million shares of preferred stock authorized. Uh-huh. A. How many stockholders own the 10,000 shares of common stock? 5 I don't know where you got -- it says 10 Α. million. 7 I mean -- I'm sorry. How many 8 stockholders own the 10 million shares of common 9 stock? 10 11 12 13
  - Okay. But just to clarify, this is shares authorized. It doesn't mean outstanding. Of the 10 million that are authorized, approximately 780,000 shares are outstanding; and that's held currently by employees around the world numbering approximately 275 to 300.
  - And of the 1 million shares of preferred stock authorized, how many are issued?
    - None. A.
  - Q. What is the difference between common stock and preferred stock?
  - Common stock typically is stock that is entitled to vote and participate in the ownership of the company. Preferred stock, depending on the types of preferences that are provided, have

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LandmarkEducation

accomplish. Answering this question does not suggest or gr power, by being specific, you will facilitate your participation.	nerenter that you will achieve these specific results by the end of the program. m. Plance answer in the space below.
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ame of the person who introduced you to The Landmark For	rum: <u>Gwendolyn Curles</u>
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	and business associates who are participating in The Landmark Forum with you
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particip	mto and their remarks and so	tions, and I agree (	to keep all such informa	tion private and confider	stial. I em elso	moare that	The Lendman	k Farum
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"Our definition of "winning in therapy": You are winning in therapy if what you and the therapist are doing (or did) is handling (or has handled) the situation(s) for which you are (or were) in therapy. In other words, you and your therapist are (or were) satisfied with the therapy.

If you are surred "yes" to questions 2 (a) or (d), or 3. or "no" to question 2 (c), we recommend that you NOT participate in the Program at this time. Pierse contact the Registrer in your Center immediately regarding this recommendation.

- 4. Even if you answered "no" to questions 2 (a), (b), and (d), or question 3. you should reconsider your participation in the Program in terms of the long hours each day and the intensity of the work. Breaks occur approximately more every 2-1/2 hours, and there is one acheduled ment break each day. (People who have a medical condition which requires more frequent eating or bothroom breaks or other special arrangements are required to notify the Program Supervisor at the beginning of the Program so that appropriate arrangements can be made.)
- 5. In the Program, you will address fundamental toxues regarding being human. In the course of such an inquiry, same people will, from time to time, experience emotions such as feat, anger, volume, regret, and despair. Also in the Fregram, or in life, people will from time to time try or experience: headathen, tirodness, nauses, confusion, disappointment, feelings of anxiety, uncertainty, and hapelesoness. Some participants may find the Program physically, mentally, and enotionally strength. If you are unwilling to encounter such experiences or if you consider that experiencing such enotions may be upsetting to you, toe recommend that you NOT participate in the Program.
- 5. Since people find different roents strenged, you should assess your own participation in the Program. In this regard, we have been adviced that persons who have suffered serious physical or emotional problems, or who have a history of physical or emotional problems in their immediate family may be more susceptible to stress than others. If you have any questions about your ability to deal with stress, an recommend you NOT participate in the Program.
- 7. The Program is not intended as a substitute for medical trastment. Please be advised that numerous kinds of physical and medical disorders and alterests may reduce your tolerance even to "normal" levels of stress. Examples of such disorders include, but are not limited to, heart and blood-percel disease, nerve and muscular disorders, glandular and metabolic disorders, some respiratory illnesses and high blood pressure. Your participation in the Program is not recommended if you fall into one of these entegories and such participation may jeoparaize your well-being. If you are presently under the care of a physician for any such disorder, or if you are not or have not been feeling well or have been meaning to set a physician for some complaint or symptom. we recommend that you consult your physician and obtain verbal approval for participating in the Program.
- 8. We want to inform you that the intake of certain kinds of drugs may reduce your tolerance to even "normal" levels of stress. Therefore, if you are currently ucing (a) major tranquilizers, (b) minor tranquilizers, (c) anti-depressants, (d) berbiturates or sedative hypnotics, (c) amphetamines or related drugs or (f) lithium, we recommend that you NOT participate in the Program at this time. If you are receiving any kind of drug therapy which is under a doctor's prescription and is not mentioned in the previous sentence, even if it seems harmless to you (e.g., antibinties), we recommend that you check with your physician to be certain that neither the drug itself nor the condition for which you are being treated will prediapose you to risk. Should your physician approve your participation in the Program, you will be able, of course, to take your medicine during the Program.

#### INFORMED CONSENT

THIS INFORMED CONSENT IS INTENDED TO HAVE LEGAL SIGNIFICANCE. IF YOU HAVE ANY QUESTIONS ABOUT ITS MEANING, PLEASE CONSULT AN ATTORNEY.

I have read and understand the above Notice, and have truthfully answered the questions in Items 2 and 3.

I have been informed that in order for me to receive the results of the Program, my participation must be an expression of my own free choice.

I represent that I am participating in the Program voluntarily and not as a result of coercion, pressure, a condition of employment, or to satisfy anyone other than myself.

I em aware and understand that the Program involves a potential rick of physical and/or emotional stress. I agree that Landmark Education Corporation is responsible only for the orderly presentation of the Program and that I am responsible for my own participation in the Program and my own well-being.

I represent that I have not enrolled in the Program to handle a physical problem or drug or alsohol problem, or to participate in therapy, and I recognize that no portion of the Program is delivered or supervised by a trained health professional. I know of no episodes in my past history which suggest in me that I have a physical or emotional disorder or a recurring and unresolved physical or emotional problem. Eurther, I know of no recurring symptoms, physical or merital, which suggest to me that I may not be able to handle the types of activities described to me as part of the Program.

I promise to inform the Program Supervisor if, at any time during the Program, I experience any physical rensetion or mantal discomfort which I consider to be out of the ordinary.

I willingly and knowingly essume for myself, and my heirs, family members, executors, administrators, and essigns, all risk of physical injury and emotional upset which may occur during ar after the Program, and I hereby agree to hold Landmark Education Corporation, its officers, directors. shereholders, employees, and agents, harmless from any and all liability erlaing out of my participation in the Program.

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has be will	Date 10/12/94	
Signature Comments		
if you are under 18 years of ageryour parent or legal guardian must read and sign below:	he was ballet	
As parent or legal guardian of the above-named minor, I agree to the above informed Corners	nt on mis (nor occurs).	

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#### CAUSE NO. 97-00933-I

TRACY NEFF, Plaintiff IN THE DISTRICT COURT

V\$.

DALLAS COUNTY, TEXAS

LANDMARK EDUCATION
CORPORATION AND DAVID GRILL,
AN INDIVIDUAL,
Defendants

162<sup>nd</sup> JUDICIAL DISTRICT

#### AFFIDAVIT OF TRACY NEFF

COMES NOW Tracy Neff, who deposed and stated as follows:

"My name is Tracy Neff. I am of sound mind, am over the age of eighteen (18), and have never been convicted of a felony or a crime of moral turpitude. The statements in this affidavit are made upon my personal knowledge and are true and correct.

"I met David Grill on the last day of my participation in the Landmark Forum, on or about December 18, 1994, at the Landmark Education Corporation Dallas Center, located near Bachman Lake in Dallas, Texas.

"After being introduced to Grill, I was told that he was the Center Manager, an employee of Landmark, and was a living example of the philosophies and teachings espoused and promoted by Landmark in the courses I attended. In particular, the Forum and related courses I took emphasized self-expression. I was told that David Grill's self expression was the best example of the teachings of Landmark.

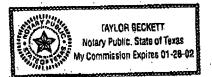
"After I completed my Forum, I began volunteering at the Dallas Center, where Grill was the supervisor. Many times I did tasks at his direction and interacted with him on numerous occasions relating to my volunteer work there. I also had conversations with him where he re-emphasized the Landmark viewpoints on self-expression, particularly in a sexual context. Grill told me that I should not feel guilt about expressing myself sexually. In particular, on January 2, 1995, Grill told me that self expression in accordance with the Landmark philosophy included freely expressing sexuality.

"On the evening of February 2, 1995, I encountered Grill while I was at the Center. He told me he needed to "share", which I recognized as a term used in the Landmark programs. Thereafter, I was manipulated by Grill to his apartment at 1117 South Akard, where the sexual assault which is the subject of this law suit took place.

## "Further Affiant Sayeth Not."

Tracy Neff X. Meff

on the 30 day of Crous 1998.



NOTARY PUBLIC in and for the State of New York