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**CORRS  
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13 November 2006

**By email:** domains@studiosolutions.com.au

Mr Andrew Smith  
Registrant of <caic.org.au>  
Unit 6, 1 Fort Main  
MILTON QLD 4064

**Partner**  
Daniel Marquet (03) 9672 3172  
Email: daniel.marquet@corrs.com.au

Dear Sir

## **Infringement of copyright owned by Landmark Education**

We act for Landmark Education LLC (**Landmark**).

You are the registrant of the domain <caic.org.au> at which the Cult Awareness Information Centre website is located (**the CAIC website**).

We are writing to you in relation to the posting on the CAIC Website of a film titled "Voyage to the Land of the New Gurus" (also known as "Voyage Au Pays Des Nouveaux Gourous") (**the Film**) and a transcript of the Film.

We are instructed that the Film incorporates portions of our client's course known as "The Landmark Forum". This course is delivered by Landmark Forum Leaders using the Landmark Forum Leaders Manual. Our client is the owner of the copyright in the Landmark Forum Leaders Manual, which is registered in the United States (TXu 1-120-461). The posting of the Film and the transcript of the Film on the CAIC Website amounts to a communication to the public of our client's work and is therefore an infringement of our client's copyright in that work.

We are also instructed that the Film contains a number of inaccurate statements and extremely serious accusations in relation to Landmark and The Landmark Forum that are unfounded and that the footage of The Landmark Forum was disclosed to the public in breach of a contractual obligation of confidentiality that applied to the TV3 journalist attending The Landmark Forum.

Furthermore, we are instructed that when the Film was broadcast in France by TV3, Landmark's attorney in France sent a detailed letter to TV3 in which he refuted what we are instructed were gross inaccuracies and defamatory representations in the Film. We are instructed that upon receipt of such letter, TV3 removed the transcript of the Film from its own website.

In light of the above, our client demands that you immediately remove the Film as well as the transcript of the Film from the CAIC Website and remove any links (either to pages on the CAIC Website or to pages on other websites) to these items.

13 November 2006

Registrant of <caic.org.au>

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Our client treats this infringement of its rights extremely seriously. Accordingly time is of the essence in relation to the removal of the Film from the CAIC Website. If the Film and the transcript are not taken down within 7 days of the date of the letter, we will seek our client's instructions in relation to the commencement of legal proceedings against you.

We appreciate your urgent attention to this matter and look forward to receiving your confirmation that the Film and the transcript have been removed from the CAIC Website.

Yours faithfully

**Corrs Chambers Westgarth**



**Daniel Marquet**  
Partner