

Bloom Rubenstein Karinja & Dillon, P.C.
70 South Orange Avenue, Suite 215
Livingston, New Jersey 07039
(973) 535-3388
PD-7957

Cohen Lans LLP
885 Third Avenue, 32nd Floor
New York, New York 10022
(212) 980-4500
DL-5063
GL-5382

Attorneys for Plaintiffs
Landmark Education LLC, Landmark Education
International, Inc. and Landmark Education
Business Development, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----x
LANDMARK EDUCATION LLC, :
LANDMARK EDUCATION INTERNATIONAL, :
INC. and LANDMARK EDUCATION :
BUSINESS DEVELOPMENT, INC., :
:
Plaintiffs, :
:
vs. :
:
THE RICK A. ROSS INSTITUTE OF NEW :
JERSEY a/k/a/ THE ROSS INSTITUTE a/k/a/ :
THE ROSS INSTITUTE FOR THE STUDY OF :
DESTRUCTIVE CULTS, CONTROVERSIAL :
GROUPS AND MOVEMENTS and RICK ROSS :
a/k/a/ "RICKY ROSS," :
:
Defendants. :
-----x

Civil Action No. 04-3022 (JCL)

Honorable John C. Lifland
Honorable Mark Falk

**DISCLOSURES PURSUANT
TO RULE 26(a)(1) OF THE
FEDERAL RULES OF
CIVIL PROCEDURE**

Plaintiffs make the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Plaintiffs reserve the right to supplement, update and amend the disclosures.

A. Contested Facts

In their answer, defendants contest every material fact concerning liability and damages set forth in plaintiffs' complaint.

B. Identities of Individuals

The following persons (not including in-house legal personnel from whom discovery would be barred by applicable privileges) are presently believed to have knowledge that plaintiffs may use to support their claims:

Ida Audet
481 B. Boulevard Iberville Apt. B
Repentigny, QC J6A 7R2
(450) 657-9474
Injury to Landmark's educational programs caused by statements published by defendants

Marie-France Audet
15503 Notre-Dame Est
Montreal, QC H1A 1W9
(514) 498-7756
Injury to Landmark's educational programs caused by statements published by defendants

Christina Auer
7479 Rue Drolet
Montreal, QC H2R 2C3
(514) 948-2430
Injury to Landmark's educational programs caused by statements published by defendants

Sir Christopher Ball
University of Derby
Chancellor Emeritus
45 Richmond Road
Oxford OX1 2
United Kingdom
+44-186-531-0800
The falsity of statements published by defendants concerning Landmark's educational programs

Julie Beaudoin
107, St-Jean-Baptiste
Apt 201
Victoriaville, QC G6P 4E7
(819) 795-4427

Injury to Landmark's educational programs caused by statements published by defendants

Professor Steven Bernasek
Princeton University
6 Brendan Place
Princeton Junction, New Jersey 08550
(609) 936-9332

The falsity of statements published by defendants concerning Landmark's educational programs

Thomas Bilyk
Cook County Illinois State's Attorney's Office
Supervisor of Fraud Cases
6139 N. Northcott Avenue
Chicago, Illinois 60631
(773) 869-6283

The falsity of statements published by defendants concerning Landmark's educational programs

Jane Bonin
2500 Q Street, N.W.
Washington, D.C. 20007
(202) 625-2977

The falsity of statements published by defendants concerning Landmark's educational programs

Bruce Borkosky, Ph.D.
200 Knuth Road, Suite 238
Boraton Beach, Florida 33436
(800) 881-0141

The falsity of statements published by defendants concerning Landmark's educational programs

Bill Bradbury
State of Oregon
Secretary of State
2250 Eola Drive, N.W.
Salem, Oregon 97304
(503) 986-1523

The falsity of statements published by defendants concerning Landmark's educational programs

Anik Brisebois
4704, De La Roche
Montreal, QC H2J 3J6
(514) 596-2546

Injury to Landmark's educational programs caused by statements published by defendants

Captain John K. Callahan, Jr.
United States Oceanographic & Atmospheric Agency
4117 1st Avenue, N.W.
Seattle, Washington 98107
(206) 789-6622

The falsity of statements published by defendants concerning Landmark's educational programs

Richard Condon
Landmark Education LLC¹
Senior Forum Leader

Conduct and content of Landmark's educational programs; the falsity of statements published by defendants concerning Landmark's educational programs

Douglas Diederich
4515 Red Rock Drive
Larkspur, Colorado 80118-8409
(303) 681-3346

The falsity of statements published by defendants concerning Landmark's educational programs

¹ The address and telephone number of each person listed herein as employed by any of Landmark Education LLC, Landmark Education International, Inc. and Landmark Education Business Development, Inc. is 353 Sacramento Street, Suite 200, San Francisco, California, 94111, (415) 981-8850.

Joseph Dimaggio
Landmark Education LLC
Senior Forum Leader
Conduct and content of Landmark's educational programs; the falsity of
statements published by defendants concerning Landmark's educational programs

Edward Fadeley
81820 Melody Lane
Creswell, Oregon 97426
(541) 942-9851
The falsity of statements published by defendants concerning Landmark's
educational programs

Paul Fireman
Reebok International Ltd.
Chief Executive Officer
895 J.P. Foster Boulevard
Canton, Massachusetts 02021
(781) 401-7800
The falsity of statements published by defendants concerning Landmark's
educational programs

Professor Jeffrey Ford
Ohio State University, Fisher College of Business
3101 Splitrock Road
Columbus, Ohio 43221
(614) 921-8714
The falsity of statements published by defendants concerning Landmark's
educational programs

Martine Fortier
4 Ch Val Des Bois
St. Sauveur, QC JOR 1R7
(450) 227-5745
Injury to Landmark's educational programs caused by statements published by
defendants

Raymond Fowler, Ph.D.
4020 Linnean Avenue, N.W.
Washington, D.C. 20008
(202) 244-8337
The falsity of statements published by defendants concerning Landmark's
educational programs

Robert Fox
Landmark Education LLC
Director of Information Technology
Landmark's electronic data systems

Professor Per Freitag
University of Southern Illinois
3716 Fielding Drive
Springfield, Illinois 62711
(217) 698-8857
The falsity of statements published by defendants concerning Landmark's
educational programs

Charette Giles
4141 Notre-Dame
Laval(Chomedey), QC H7W 1T2
(514) 578-5856
Injury to Landmark's educational programs caused by statements published by
defendants

David Guerin
1413 3ieme Avenue
Val-Morin, QC JOT 2R0
(819) 322-6915
Injury to Landmark's educational programs caused by statements published by
defendants

Keith Henry
Merrill Lynch
Marketing Executive
6 Buell Street
Somerset, New Jersey 08873
(732) 873-5218
The falsity of statements published by defendants concerning Landmark's
educational programs

Evan Hough
606 University Place
Swathmore, Pennsylvania 19081
(610) 328-5122
The falsity of statements published by defendants concerning Landmark's
educational programs

Linda Howard, Esq.
340 East 93rd Street, #24J
New York, New York 10128
(212) 857-1531

The falsity of statements published by defendants concerning Landmark's educational programs

Nathalie Hudon
8550, Saguenay
Brossard, QC J4X 1P4
(450) 672-0500

Injury to Landmark's educational programs caused by statements published by defendants

Michael Jensen, Ph.D.
7858 Sanderling Road
Sarasota, Florida 34242
(941) 346-5447

The falsity of statements published by defendants concerning Landmark's educational programs

Tom Koenig
591 West Old Mill Road
Lake Forest, Illinois 60045
(847) 234-4535

The falsity of statements published by defendants concerning Landmark's educational programs

Luc Labrecque
107 St-Jean-Baptiste
Apt 201
Victoriaville, QC G6P 4E7
(819) 795-4427

Injury to Landmark's educational programs caused by statements published by defendants

Michael Leavitt
Landmark Education LLC
Vice President of Media Relations

Paragraphs 36 through 39 of the complaint; defendants' publication of false statements to the media concerning Landmark

Gregory Lester, Ph.D.
111 Harrison Street
Denver, Colorado 80206
(303) 399-3406

The falsity of statements published by defendants concerning Landmark's educational programs

David Logan, Ph.D.
University of Southern California
Associate Dean and Executive Director, Executive
Education Marshall School of Business
747 North La Jolla Avenue
Los Angeles, California 90046
(310) 625-1551

The falsity of statements published by defendants concerning Landmark's educational programs

Edward Lowell, M.D.
One Scenic Drive, Apt. 1404
Highlands, New Jersey 07732-1322
(732) 708-0444

The falsity of statements published by defendants concerning Landmark's educational programs

Mark Kamin
Landmark Education LLC
Former Vice President of Media Relations
Defendants' publication of false statements to the media concerning Landmark

Aloma Marquis
810 ½ N. Mound Street, #4
Nacadoches, Texas 75961
(936) 414-2405

The falsity of statements published by defendants concerning Landmark's educational programs

Professor Steven McCarl
University of Denver
345 Fillmore Street
Denver, Colorado 80206
(303) 871-2138

The falsity of statements published by defendants concerning Landmark's educational programs

John McIlwain, Esq.
2825 Filbert Street
Oakland, California 94608
(202) 329-7865

The falsity of statements published by defendants concerning Landmark's educational programs

Charles Mc Neill, Ph.D.
United Nations Development Program
Team Manager and Advisor
301 East 38th Street, #9J
New York, New York 10016
(212) 867-9411

The falsity of statements published by defendants concerning Landmark's educational programs

Bradford Mills
Lonmin PLC
Chief Executive Officer
4 Grosvenor Place
London SW1X 7YL
England
+44-20-7201-6000

The falsity of statements published by defendants concerning Landmark's educational programs

Fr. Francis Nelson
P.O. Box 20386
New York, New York 10023-1485
(212) 345-1344

The falsity of statements published by defendants concerning Landmark's educational programs

Rev. Gerard O'Rourke
Archdiocese of San Francisco
Emeritus Ecumenical Affairs Officer
1 Peter Yorke Way
San Francisco, California 94109
(415) 614-5590

The falsity of statements published by defendants concerning Landmark's educational programs

Rick Pauling
Compañía Minera Antamina S.A.
President
10607 East Hummingbird Avenue
Gold Canyon, Arizona 85218
(480) 982-0032

The falsity of statements published by defendants concerning Landmark's educational programs

Michele Pelletier
257, D'Avignon
D.D.O, QC H9B 1Y4
(514) 394-7470

Injury to Landmark's educational programs caused by statements published by defendants

Bert Peterson, M.D.
Hackensack University Medical Center
251 West 19th Street
New York, New York 10011
(212) 243-4520

The falsity of statements published by defendants concerning Landmark's educational programs

Louis Picard
295, Brochu
Sept-Iles, QC G4R 2W4
(418) 962-7401

Injury to Landmark's educational programs caused by statements published by defendants

Brigitte Pilon
489 Domaine Lauzon
St-Faustin-Lac-Carre, QC J0T 1J2

Injury to Landmark's educational programs caused by statements published by defendants

Anthony Rapp
1 Bond Street, #2A
New York, New York 10012
(917) 653-3490

The falsity of statements published by defendants concerning Landmark's educational programs

Francine Regnier
295 Brochu
Sept-Iles, QC G4R 2W4
(418) 962-7401
Injury to Landmark's educational programs caused by statements published by
defendants

Professor Leslie Reidel
University of Delaware
334 Wedgewood Road
Newark, Delaware 19711
(302) 454-1213
The falsity of statements published by defendants concerning Landmark's
educational programs

Jerry Roberts
Pepsico
Vice President
17 Grist Mill Road
Cedar Knolls, New Jersey 07927
(973) 631-1421
The falsity of statements published by defendants concerning Landmark's
educational programs

Harry Rosenberg
Landmark Education LLC
Chief Executive Officer
Claims made by plaintiffs

Rick Ross
The Ross Institute
Founder and Executive Director
35 Hudson Street, Unit 1709-West
Jersey City, New Jersey 07310
(201) 434-9234
Claims made by plaintiffs and defenses asserted by defendants

Stephen Sarfaty
238 Talmadge Road
Cheshire, Connecticut 06410
(203) 271-3809
The falsity of statements published by defendants concerning Landmark's
educational programs

Don Sapatkin
7007 Crestheim Road
Philadelphia, Pennsylvania 19119
(610) 313-8246
The falsity of statements published by defendants concerning Landmark's
educational programs

Danny Schayes
15196 Isleworth C.C. Drive
Windermere, Florida 34786
(407) 808-0024
The falsity of statements published by defendants concerning Landmark's
educational programs

Laurel Scheaf
Landmark Education LLC
Senior Forum Leader
Conduct and content of Landmark's educational programs; the falsity of
statements published by defendants concerning Landmark's educational programs

Donald Shelton
1232 West Whestridge
Tucson, Arizona 85704
(520) 887-8355
The falsity of statements published by defendants concerning Landmark's
educational programs

Lowell Streiker, Ph.D.
3309 El Camino Drive
Cottonwood, California 96022
(530) 347-1948
The falsity of statements published by defendants concerning Landmark's
educational programs

The Honorable Moody Tidwell
United States Court of Federal Claims
912 Memorial Drive
Sturgeon Bay, Wisconsin 54235
(920) 743-7666
The falsity of statements published by defendants concerning Landmark's
educational programs

Maryse Tourigny
3918 De Bullion
Montreal, QC H2W 2E1
(514) 817-1104
Injury to Landmark's educational programs caused by statements published by defendants

David Ure
Landmark Education LLC
Regional Manager and Senior Forum Leader
Conduct and content of Landmark's educational programs; the falsity of statements published by defendants concerning Landmark's educational programs

Helene Vincent
2553 Avenue De La Salle App#B
Montreal, QC H1V 2L4
(514) 254-4152
Injury to Landmark's educational programs caused by statements published by defendants

Jeff Wilmore
Landmark Education LLC
Senior Forum Leader
Conduct and content of Landmark's educational programs; the falsity of statements published by defendants concerning Landmark's educational programs

Nancy Zapolsky
Landmark Education LLC
Senior Forum Leader
Conduct and content of Landmark's educational programs; the falsity of statements published by defendants concerning Landmark's educational programs

C. Documents

Plaintiffs have in their possession at their headquarters in San Francisco various documents responsive to Defendants' First Request For Production of Documents and Things to Plaintiffs.

D. Computation of Damages

The parties have agreed to bifurcate the issues of liability and damages.

Plaintiffs have suffered substantial damages -- believed to be in excess of \$250,000 -- as a result of defendants' activities as described in the complaint. Those damages fall into at least the following categories:

1. Harm to the good will of Landmark's educational programs -- plaintiffs require discovery in order to be able to compute, to the extent such harm to the good will of their educational programs is capable of computation, the full extent of their damages (which continue to increase due to the continuing nature of defendants' wrongful conduct as alleged in the complaint);
2. Reduced registration in Landmark's educational programs -- no complete computation of the extent of this category of damages is presently available. Plaintiffs require discovery in order to ascertain the extent to which defendants' wrongful conduct as alleged in the complaint has caused (and is continuing to cause) reduced registration in Landmark's educational programs; and
3. Out-of-pocket expenses -- plaintiffs have expended (and continue to expend) substantial time and resources to combat the false information about Landmark's educational programs spread by defendants. The full extent of plaintiffs' damages are therefore incapable of computation prior to the complete cessation of defendants' wrongful conduct as alleged in the complaint.

E. Insurance Agreements

Not applicable.

F. Experts

No testifying expert has yet been identified by plaintiffs. As such experts are identified, plaintiffs will provide that information which is required by the applicable rules.

Dated: December 10, 2004

Cohen Lans LLP

By: *Gary I. Lerner*
Deborah E. Lans
Gary I. Lerner

885 Third Avenue
New York, New York 10022
(212) 980-4500

- and -

Paul J. Dillon
Bloom Rubenstein Karinja & Dillon, P.C.
70 South Orange Avenue
Livingston, New Jersey 07039
(973) 535-3388

Attorneys for Plaintiffs

To: Peter L. Skolnik, Esq.
Lowenstein Sandler PC
Attorneys for Defendants
The Ross Institute and Rick Ross
65 Livingston Avenue
Roseland, New Jersey 07068
(973) 597-2500