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January 6, 2005

VIA FACSIMILE AND FEDERAL EXPRESS

Honorable Mark Falk, U.S.M.J.
United States District Court
United States Post Office & Courthouse
1 Federal Square, Room 457
Newark, New Jersey 07101

**Re: Landmark Education LLC, et al. v. The Rick A. Ross
Institute of New Jersey, et al., Civil Action No. 04-3022 (JCL)**

Dear Magistrate Judge Falk:

On behalf of plaintiffs ("Landmark") we write because defendants have categorically refused voluntarily to enter into a stipulation to keep confidential Landmark's trade secrets and other highly-sensitive proprietary information, and to request permission to move for a protective order. A copy of defendants' First Document Request is Exhibit A.¹ The particular requests at issue are Nos. 1-3, 8-10, 14 and 46. The titles of the specific documents that Landmark seeks to protect are set forth in the attached Schedule. There are three categories of documents for which Landmark seeks protection: (1) training and educational materials, scripts and staff policies and procedures; (2) policies and procedures concerning Landmark's digital information systems; and (3) customer surveys. The proposed order that Landmark would attach to its motion accompanies this letter.

Background

Landmark is an employee-owned company that delivers educational programs to the public in the United States and in twenty-four other countries. Having commenced operations in 1991, Landmark offers a four-part Curriculum For Living, with the basic program being The

¹ All referenced exhibits are annexed to the couriered copy of this letter.

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Landmark Forum, a three-day program (plus one follow-up evening session), and several advanced courses all directed to enhancing communication, creativity and productivity for participants. Landmark's courses are sold to individuals seeking to improve the quality of their lives. Many businesses seeking to improve performance, creativity and organizational effectiveness, including Fortune 500 companies such as IBM and public sector entities such as the United States Postal Service encourage their employees to attend The Landmark Forum by reimbursing them for the cost of tuition. In addition, Landmark is an accredited member of the International Association for Continuing Education and Training, and people who participate in Landmark courses receive continuing education units ("CEUs"). More than 125,000 people from around the world participate in the programs offered by Landmark each year.

Landmark's course manuals have been developed over a roughly 14-year period and represent the end product of millions of dollars and thousands of hours of investment by its personnel in developing and refining its programs. Landmark's sole source of revenue is the tuition it is paid by program participants. Landmark has numerous competitors which run programs similarly focused on personal development. However, their educational methodologies differ drastically from Landmark's. No competitor of Landmark possesses the information necessary to replicate either the content of Landmark's programs or Landmark's unique delivery of that content. In large part, Landmark's high registration figures are due to the fact that although it has competitors, there are no imitators.

Defendants operate Internet web sites alleged to be a database of information about cults. Landmark's complaint stems from defendants' posting of disparaging materials on their web sites about Landmark's educational programs, defendants' refusal to post positive materials about Landmark's programs on their web sites and defendants' false statements about Landmark's programs published in the media.

The Law: Protective Orders Prohibiting Public Disclosure of Discovery Materials

Rule 26(c) of the Federal Rules of Civil Procedure permits a court, upon a showing of "good cause," to make an order to protect against the untoward revelation of trade secrets or other confidential research, development, or commercial information. Fed. R. Civ. P. 26(c)(7).

The Third Circuit has adopted the definition of "trade secret" set forth in comment b to Section 757 of the Restatement (First) of Torts. A trade secret is "any formula, pattern, device, or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competition who do not know or use it." In re Gabapentin Patent Litig., 312 F. Supp. 2d 653, 659 (D. N.J. 2004) (Lifland, J.) (citing Rohm & Haas Co. v. Adco Chem. Co., 689 F.2d 424, 431 (3d Cir. 1982)). One of the hallmarks of a trade secret is the taking of extensive measures by the owner to guard the secrecy of the information. Restatement (First) of Torts § 757, comment b (1939).

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“Good cause” for the issuance of a protective order is established when it is “specifically demonstrated that disclosure will cause a clearly defined and serious injury.” Glenmede Trust Co. v. Thompson, 56 F.3d 476, 483 (3d Cir. 1995). The Third Circuit has set forth seven non-mandatory, non-exhaustive, factors that district courts may take into account in considering whether to issue the order:

1. whether disclosure will violate any privacy interests;
2. whether the information is being sought for a legitimate purpose;
3. whether disclosure of the information will cause a party embarrassment;
4. whether confidentiality is being sought over information important to public health and safety;
5. whether the sharing of information among litigants will promote fairness and efficiency;
6. whether a party benefiting from the order of confidentiality is a public entity or official; and
7. whether the case involves issues important to the public.

Pansy v. Borough of Stroudsburg, 23 F.3d 772, 789 and 792 (3d Cir. 1994). No matter which factors are considered, the analysis must always “reflect a balancing of private versus public interests.” Glenmede Trust Co., 56 F.3d at 483. Good cause must be established as to each and every document sought to be covered by the order. Cipollone v. Liggett Group, Inc., 785 F.2d 1108, 1121 (3d Cir. 1986). However, in complex cases involving large scale discovery, courts may construct broad “umbrella” orders. Id.

Although the fact that information is a trade secret does not absolve the protective order movant from meeting the stringent “good cause” standards of Fed. R. Civ. P. 26(c), the very existence of the express reference to trade secrets in Fed. R. Civ. P. 26(c)(7) suggests that such orders are particularly appropriate to protect against the substantial harm that is likely to occur as a result of trade secret disclosure. In Gabapentin, Your Honor determined, and Judge Lifland affirmed, that a blanket protective order was properly entered to protect the disclosing parties from the harm that would flow from disclosure of their trade secrets and other commercial information to competitors. 312 F. Supp. 2d at 653. Accord, Rutigliano v. Appleton Papers, Inc., 2000 WL 1705152, at *4 (D. N.J. Oct. 6, 2000) (Lifland, J.) (same).

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A Protective Order Should Issue

The trade secret/proprietary documents fall into three categories:

**A. Training and Educational Materials,
Scripts and Staff Policies and Procedures**

Defendants seek to discover the content of the educational programs that are Landmark's business, the ways in which Landmark staff members are trained to deliver Landmark's products and the ways in which Landmark deals with, and trains its staff to deal with, marketing, registration, customer concerns and other core business issues.

Defendants' Document Requests Nos. 1-3, 8 and 46 broadly seek (1) "any and all versions" of each of plaintiffs' training manuals, videos, audio tapes, handbooks, guides, reference sheets, or other documents that have ever been used to train, educate, inform, instruct or prepare employees, potential employees and/or volunteers, as to:

organizing, managing, leading or participating in conducting Landmark's programs;

locating, preparing and setting up any room, auditorium, lecture hall, or any other venue where any Landmark program has ever been or is going to be held;

endorsing, selling, advertising or promoting any Landmark program;

convincing existing customers to register for additional Landmark programs, refrain from discontinuing their participation or become Landmark volunteers; and

handling customer concerns or complaints, as well as

(2) any and all versions of Landmark's educational materials, videos, tapes, manuals, books, handbooks, workbooks, guides, homework assignment sheets or any other materials ever used to inform or instruct participants or enrollees in the programs, and (3) any and all current and former scripts used by Landmark employees during communications on any subject with any participant in Landmark's programs.

The titles of the documents responsive to these requests are set forth in Section I of the enclosed Schedule. Most of them are manuals used by instructors while teaching Landmark's various courses and by staff members who assist in that instruction. Each manual is a script containing the entire content of the subject course, although the classroom experience also involves much student participation including the sharing of personal experiences. Other

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documents are manuals that set forth the policies and procedures to be followed by staff members employed in the core areas of Landmark's business, such as marketing, customer service and registration. There are also a number of instructional video tapes as well as video-taped recordings of Landmark's courses maintained for the sole purpose of training instructors to teach courses and training staff members employed in the core areas of Landmark's business.

1. Content

Most of the manuals listed in Section I of the enclosed Schedule literally contain the content and the methodology of Landmark's "technology" which is taught to students by instructors and by assisting staff members. In other words, these documents contain the very essence of Landmark's products. Because Landmark's intellectual property is not generally known, students are willing to pay money to attend Landmark classes. Moreover, none of Landmark's competitors (and there are many) can duplicate the experience Landmark offers to its students.

Landmark's business and sole source of revenue is the tuition paid to it by students who seek the unique life coaching that only Landmark provides. Landmark has spent over a decade developing and refining the content and delivery of its courses. As a result and due to its zealous protection of its intellectual property, Landmark's products are different from, and cannot be copied by, the products of any competitor that offers personal development courses. It is the uniqueness of what Landmark does that results in more than 125,000 people each year from around the world paying their hard earned money to participate in Landmark's programs.

If public disclosure of Landmark's course materials is permitted, competitors would be able to use the information to duplicate Landmark's classes, thereby eliminating the uniqueness upon which Landmark's business relies and causing financial harm potentially so great that Landmark's continued existence would be placed in jeopardy. Potential customers interested in Landmark who previously would have registered could be diverted to imitators. Even eliminating competitors from the equation, prospective registrants who would otherwise pay money to attend Landmark courses might (wrongly) assume that they can derive the entire benefit of Landmark's technology by simply reviewing the course materials. Thus, the public availability of Landmark's intellectual property would likely drastically decrease registration and cause potential financial ruin to Landmark even in the absence of competitors.

Put in terms of the Restatement formulation applied by this Circuit, Landmark's program manuals are a compilation of information used by Landmark in its business which gives it an advantage over competition who do not know or use it.

Additionally, the policies and procedures followed by Landmark staff are also trade secrets. Marketing to, registering and properly serving students is essential to the success of any educational institution. These are things that Landmark does extremely well -- better than its

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competitors -- because of the detailed policies and procedures taught to Landmark staff members employed in such core business areas and painstakingly embodied in written manuals for training and ready reference. Those documents, though not the product per se that Landmark sells, are no less a compilation of information used by Landmark in its business which gives it an advantage over its competition who do not know or use it.

Courts have often held that a business's internal training manuals, and its policies and procedures, are trade secrets the untoward revelation of which is to be protected against by a protective order. See, e.g., In re Mid American Waste Sys., Inc. Sec. Litig., 1997 WL 1045729 (D. N.J. Dec. 10, 1997) (denying plaintiff's motion to compel accounting firm to produce complete and unredacted audit manuals); Saldi v. Paul Revere Life Ins. Co., 224 F.R.D. 169 (E.D. Pa. 2004) (ordering plaintiff to keep confidential insurer's materials used to train its employees).

2. Steps to Guard

Landmark takes extensive measures to guard the secrecy of all its training and educational manuals, policies, procedures and scripts, as can be detailed by affidavit if a formal motion is required. In brief:

- Landmark registers all of its intellectual property for copyright protection. Each of its manuals contains a copyright notice. As an example, a copy of the cover page of The Landmark Forum Leaders Manual is Exhibit B;
- Every manual containing the content of a Landmark course contains a confidentiality statement prohibiting copying, distribution or use for any purpose other than as intended without Landmark's prior written permission. See, e.g., Exhibit B;
- Every Landmark student is required to sign a Proprietary Materials Agreement whereby (s)he agrees not to copy or distribute any written or oral materials presented in connection with his/her class without Landmark's prior written permission. A copy of the relevant text of that agreement is Exhibit C;
- Every Landmark staff member is required to sign a No Resale Agreement whereby (s)he agrees not to share course or training materials with third parties without Landmark's prior written permission. A copy of that agreement is Exhibit D;
- Every instructor for any of Landmark's graduate programs is required to sign a Program Leader Agreement whereby (s)he agrees not to share course or training

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materials with third parties without Landmark's prior written permission. A copy of that agreement is Exhibit E; and

- Upon receipt of information that a third party anywhere in the world is using Landmark's intellectual property, its General Counsel has written cease and desist letters to the third party and, where possible, to counsel for the third party. In those cases in which Landmark did not receive a satisfactory response, it has engaged counsel, inside and outside of the United States as necessary, to initiate legal action to protect Landmark's intellectual property.

3. Applying the Balancing Test

Applying the balancing test used in this Circuit, there exists "good cause" for an order protecting the confidentiality of Landmark's training and educational manuals, policies, procedures and scripts. Landmark is prepared to produce all of these materials to defendants. However, granting defendants unrestricted access to such documents will violate a significant privacy interest of Landmark and is likely to result in substantial economic harm for the reasons set forth above. There is good reason to believe that defendants will post Landmark's intellectual property on their web sites.² Indeed, defendants have repeatedly boasted of their intention to use the discovery process to inflict serious harm on Landmark.

In addition to Landmark's substantial privacy interest, defendants seek unrestricted access to Landmark's trade secrets for improper purposes. Ross's main goal is and always has been, as set forth in Landmark's complaint, to drum up business for his de-programming services by posting negative materials about Landmark on his web sites. Ross could accomplish that purpose by posting snippets of Landmark's manuals out of their proper context (as well as, of course, by posting the customer surveys addressed below). Financial gain is not a proper purpose of discovery. See Damiano v. Sony Music Entertainment, Inc., 168 F.R.D. 485, 492 (D. N.J. 1996) ("using raw discovery materials for financial profit is not what this court considers to be a legitimate purpose for disclosure").

Further, some of the training video tapes set forth in Section I of the enclosed Schedule, such as the "Self-Expression and Leadership Program taped on July 8-9, 2000" and "Shares from LEC 2020 Event," contain intensely personal information revealed by Landmark's students in reliance upon the strict confidentiality afforded to such disclosures by Landmark and by fellow students. Persons registering for Landmark's programs sign an agreement promising to keep confidential the remarks and actions of all other participants. Students are reminded during the

² Defendants are accused of copyright infringement in an action pending in the Northern District of New York entitled NXIVM Corp., et al. v. The Ross Institute, et al., Index No. 1:03-cv-00976-GLS-DRH (2003), by reason of having posted on their web sites illegally-obtained copies of that plaintiff's course materials for its business training seminar.

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course of Landmark's programs of the confidentiality of fellow students' participation in the class and their obligation to honor that confidentiality. To allow the public dissemination of those video tapes would violate the privacy rights of those non-party students.

On the other side of the balance, defendants may assert that issues in this action are important to the public or to public health and safety. However, defendants' only basis for that position would be their own unsupported (and Landmark contends insincere) belief that Landmark's courses harm students. Unless defendants are prepared to present competent evidence of such harm, that position should not be given any weight. See Rutigliano, 2000 WL 1705152 (because plaintiff was unable to provide any competent evidence that defendant's product was dangerous, Judge Lifland denied plaintiff's motion to modify an existing protective order which plaintiff contended protected from disclosure information important to the public). Moreover, even were defendants' assertion founded, that would not compel publication of all of Landmark's internal materials, which have no bearing on the health and safety issue.

B. Digital Information Policies and Procedures

Apparently to assure themselves that Landmark makes an appropriate production of digital information, defendants seek to discover documents concerning Landmark's policies and procedures with respect to its electronic data systems. Defendants' Document Request No. 14 broadly seeks "all documents" that describe the structure of, and the policies and procedures governing, "any and all" electronic databases and back-up systems maintained by Landmark to store, maintain, preserve or save "any and all" emails and other electronic documents.

Some of the staff manuals described in (A) above contain responsive information. However, responsive information is also contained within three computer system user manuals set forth in Section II of the enclosed Schedule. These user manuals describe the operation, use and technical aspects of proprietary data management systems containing sensitive customer information. The systems were created at great expense by and for Landmark and certain staff members (only) authorized by Landmark to use those systems.

It is also indisputable that these documents are valuable trade secrets. The information systems described in these documents are used to keep track of registrants and are also used to compile statistics for marketing and other purposes. Because of the commercially sensitive information on these systems, and the fact that they contain personal information about Landmark's students, access to these systems are limited to authorized Landmark staff members and certainly is not permitted to third parties. The systems are unique to Landmark -- third parties do not have knowledge of the operation, functions, capabilities and technical aspects of these systems. Clearly, the user manuals are compilations of information used by Landmark in its business which gives it an advantage over competition who do not know or use it.

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Moreover, even if defendants had support for their assertion that Landmark's courses cause harm, it is hard to conceive how these computer user manuals would be relevant to any issue of public health or safety.

Applying the balancing test used in this Circuit, there exists "good cause" for an order protecting the confidentiality of the user manuals. These documents are not substantive discovery. They are sought only so that defendants can judge the sufficiency of Landmark's production of digital information. In light of this limited purpose and the questionable utility of the materials in connection with this tangential purpose, there is no public interest served by granting defendants unrestricted access to these materials.

On the other side of the scale, Landmark has a significant privacy interest in protecting the secrecy of the user manuals. It goes without saying that if someone were to gain unlawful access to Landmark's computers (and many of its instructors travel worldwide with laptops) Landmark would have a legitimate interest in the person not having the knowledge necessary to navigate the system. Moreover, Landmark's competitors who have not had the foresight to create certain functionalities in their own computer systems could be aided in so doing, so as to better compete with Landmark in core business areas such as marketing, registration and customer service. Landmark would then lose a competitive advantage resulting in significant financial harm.

C. Customer Surveys

Defendants apparently hope to support their truth defense by seeking customer complaints received by Landmark concerning the content of Landmark's programs or concerning Landmark's business practices. Defendants' Document Requests Nos. 9 and 10 broadly seek "any and all documents" received by Landmark that refer or relate to concerns or complaints regarding any Landmark program or any of Landmark's business practices.

Landmark does not seek a broad protective order deeming confidential any complaint it has ever received from a customer. However, there is a small subset of customer complaints that Landmark received in response to its reaching out to its customers for feedback concerning the content of the company's programs and the customers' overall experiences with Landmark and its personnel. This self-evaluative process was undertaken with the goal of determining customer concerns so as to improve both the content of Landmark's programs, their delivery and the public's experience with Landmark. The title of the document containing the responses received by Landmark is set forth in Section III of the enclosed Schedule. This Court can and should order that such documents be deemed confidential to further the public policy that forms the basis of the self-critical analysis privilege.

The self-critical analysis privilege is recognized in this Circuit as furthering the public interest in institutional self-analysis and improvement. See, e.g., Torres v. Kuzniasz, 936 F.

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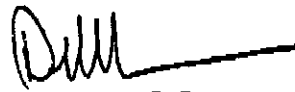
Supp. 1201 (D. N.J. 1996). The privilege renders immune from disclosure investigations, assessments and evaluations conducted on an institution-wide basis. *Id.* at 1214. However, only the evaluative opinions reached as a result of the investigation and not the underlying facts disclosed during the course of the self-evaluation are protected from discovery. *Id.* at 1215.

Thus, documents concerning the evaluative opinions reached by Landmark as a result of the data revealed in its customer surveys is immune from discovery while the underlying facts revealed by those surveys (*i.e.*, the customer complaints set forth therein) are discoverable. Nonetheless, Landmark should not be penalized for trying to improve its products and its relations with the public by being forced to give defendants unrestricted access to customer complaints that Landmark itself instigated, especially given that this litigation arises out of defendants' very public disparagement of Landmark's educational programs. Courts applying the privilege attempt to strike an appropriate balance between the public benefits of encouraging self-analysis and the opposing litigant's entitlement to legitimate discovery. *Harding v. Data Transport, Inc.*, 914 F. Supp. 1084, 1100 (D. N.J. 1996). This Court should strike a proper balance here by ordering that the confidentiality of the customer surveys be protected.

Conclusion

Landmark does not wish to burden this Court with motion practice but defendants' categorical refusal voluntarily to enter into any protective order has left no other option but to make this request for permission to file a motion. Landmark is of course amenable to resolving any or all of the above issues without formal motion practice and we remain available at your convenience for an in-person or telephone conference. Thank you in advance for your attention to this matter.

Respectfully,



Deborah E. Lans

cc: Peter L. Skolnik, Esq.
Paul J. Dillon, Esq.

**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

PROTECTIVE ORDER

Upon consideration of Plaintiffs' Motion For a Protective Order, and the Court having found that Plaintiffs have a legitimate business need to protect the confidentiality of the documents identified in the Schedule attached to Plaintiffs' motion, to wit: (1) Plaintiffs' training and educational materials, scripts and staff policies and procedures; (2) policies and procedures concerning Plaintiffs' digital information systems; and (3) surveys completed by Plaintiffs' Customers (the "Confidential Material"), it is by the Court, pursuant to Rule 26(c)(7) of the Federal Rules of Civil Procedure, hereby ordered:

1. That Defendants and their counsel shall strictly confine the use of the Confidential Material to this litigation and shall not use Confidential Material for any other purpose; and
2. That Defendants and their counsel are prohibited from directly or indirectly disclosing Confidential Material on their Internet web sites or to any third party who has not been engaged to assist Defendants as an expert or attorney in this litigation.

It is SO ORDERED.

Signed this the _____ day of _____, 2005.

UNITED STATES DISTRICT JUDGE

SCHEDULE

I. Training Materials, Manuals and Scripts (Responsive to Document Requests Nos. 1-3, 8 and 46)

The Landmark Forum Leaders Manual
 Course Supervisors Manual for the Landmark Forum
 Communication: Access to Power Leaders Manual
 Communication: Access to Coach Supervisor Manual
 Communication: Performance and Power Leaders Manual
 Communication: Performance and Power Course Supervisors Manual
 Being Extraordinary: The Art and Practice of Living From Possibility Leaders Manual
 Landmark Forum in Action Leaders Manual
 Integrity: The Bottom Line Leaders Manual
 Breakthroughs: Living Outside the Box Leaders Manual
 Commitment: The Path to Adventure Leaders Manual
 Sex and Intimacy Leaders Manual
 Excellence: In the Zone Leaders Manual
 Beyond Fitness: A Breakthrough in Well Being Leaders Manual
 Velocity Seminar Leaders Manual
 Relationships Seminar Leaders Manual
 Money Seminar Leaders Manual
 Effectiveness Seminar Leaders Manual
 Creativity Seminar Leaders Manual
 The Living Passionately Seminar: The Art and Mastery of Playing the Game of Life Leaders Manual
 Self-Expression and Leadership Program Coaches Training Manual
 Self-Expression and Leadership Program Leaders Manual (with appendices)
 Self-Expression and Leadership Program Instructor Manual
 Self-Expression and Leadership Program Head Instructor Manual
 Self-Expression and Leadership Program City Coach Manual
 Self-Expression and Leadership Program Policy Manual
 Advanced Course Leaders Manual
 Advanced Course Coach Supervisors Manual
 Developmental Course: Power and Contribution Leaders Manual (with appendices)
 Partnership Explorations Course Leaders Manual
 Wisdom Course Leader's Manual (with appendices)
 Introduction Leaders Program Weekend Manual
 Introduction Leaders Program Classroom Manual (with appendices)
 Introduction Leaders Program Policies and Procedures Manual for Program Leaders (with appendices)
 Introduction Leaders Program Participant Binder
 The Landmark Forum For Young People Leaders Manual

Landmark Forum in Action Leaders Manual
Communication Course Leader Body Policies Manual
Family Coaching Session Leading Manual
Seminar Leader Manual
Seminar Leader Program Policy Book
Seminar Leader Orientation Manual
Course Supervisor Manual: Competencies and Score Sheets
Course Supervisor Program: Local Coordinator Manual
Participant Well-Being Manual
Production Supervisor Guidelines: The Seminar Program
Production Supervisor Guidelines: The Landmark Self-Expression and
Leadership Program
Self-Expression and Leadership Program Registration Manager Manual
Registration Fulfillment Manager Manual
Reception Manual
Communication: Access to Power Production Supervisor Guidelines (with
appendices)
Production Manager Manual (with appendices)
Participant Manager Manual
The Landmark Forum Production Supervisor Guidelines (with appendices)
Landmark Forum Registration Manager Manual
Assisting Program Manual
Assisting Registration Program User Manual
Introduction Leader Management Manual
Finance Manager Manual
Communication: The Power to Create Production Supervisor Guidelines (with
appendices)
Communication Curriculum: Registration Manager Manual
Center Maintenance Manual
Advanced Course Production Supervisor Guidelines
Advanced Course Registration Manager Manual
Video: Staff Orientation to Assisting
Video: Participant Well Being Training for Registration Fulfillment Managers
Video: Introduction to Being a Landmark Forum Leader
Video: Landmark Reception Training Video
Video: Phone Training
Video: Self-Expression and Leadership Program taped on July 8-9, 2000
Video: Intro to Assisting
Video: Distinction of Community
Video: Excerpts from Reception Video
Video: Intro Clearing and Debrief
Video: LEC 2020 Video Event
Video: Shares from LEC 2020 Event
Video: New Introduction Implementation Video
Video: New Introduction to the Landmark Forum
Video: 2007 Outcomes: April 2003 Event

Video: ILP Program Leader Agreement Video
Video: Transfer Refund Policy/LEC

**II. Information Technology Proprietary Materials
(Responsive to Document Request No. 14)**

Landmark Education Statistics 1.2 Program User Manual
CIS 4.1 User Manual
CIS Lite 4.1 User Manual

III. Customer Surveys (Responsive to Document Requests Nos. 9-10)

Sept/Oct/Nov 2000 Landmark Education Customer Service Surveys