

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

MARK ROBBINS,

CASE NO:

Plaintiff,

DEMAND FOR JURY TRIAL

vs.

JOSEPHINE ENGLESSION, individually, and
GRATITUDE TRAINING LLC, a Florida
Corporation,

Defendants,

COMPLAINT AND DEMAND FOR JURY TRIAL

The Plaintiff, Mark Robbins (hereinafter “Robbins”), by and through his undersigned counsel, files this Complaint against Josephine Engleson (hereinafter “Engleson”), and Gratitude Training, LLC.

Jurisdiction and Venue

1. This is an action seeking damages in excess of \$15,000.
2. This is an action for the following claims:
 - a. Count I against Engleson and Gratitude Training, LLC for Violation of Fla. Stat. § 448.110(3);
 - b. Count II against Engleson and Gratitude Training, LLC for Violation of Fla. Stat. § 448.110(5);
 - c. Count III against Engleson and Gratitude Training, LLC for Negligent Infliction of Emotional Distress; and
 - d. Count IV against Engleson and Gratitude Training, LLC for Intentional Infliction of

Emotional Distress.

Where conduct of more than one Defendant is specifically pled in the counts, Robbins seeks to have such Defendants held jointly and severally liable for each such count.

3. Venue is proper in this Court pursuant to Fla. Stat. § 47.011 because the claims arose here, and the Defendants transact and/or conduct business here.

Parties

4. At all times material hereto, Robbins was an individual of majority age and a resident of Broward County, Florida.

5. At all times material hereto, Engleson was an individual of majority age and a resident of Broward County, Florida.

6. At all times material hereto, Gratitude Training, LLC (hereinafter “Cult”) was a Florida limited liability company, with its principal address in Pompano Beach, Florida.

General Allegations

7. The Cult offers a three (3) part Gratitude Training program (hereinafter “GT”). Its website promotes GT as a program to “challenge[] you to illuminate your blind spots;” “enhance[] your critical thinking skills;” and teaches you to “operate as a solution-oriented leader” and “fully access authentic gratitude and joy.”

8. Upon information and belief, neither the Cult nor GT hold any licenses for medicine, and/or therapy.

9. On or about June 1, 2017 Robbins became a student and/or a participant in GT along with his nineteen (19) year old adopted twin identical sons Jack Robbins (hereinafter “Jack”) and Billy Robbins (hereinafter “Billy”).

10. Robbins and his sons entered into GT expecting a healthy and wholesome self-growth program, and had no expectation that they were entering into a Cult.
11. Robbins' sons have special mental health needs, which make them more vulnerable to the Cult and GT's influence. Billy is a transitioning transgender. Jack has been diagnosed with Borderline Personality Disorder
12. Engleson is the founder and managing member of the Cult.
13. The Cult employs staff members with histories of prostitution, and/or drugs.
14. The Cult allows sexual molesters to participate in GT.
15. The Cult allows minors to participate in GT.
16. The Cult and GT are intertwined with New Beginnings Retreat.
17. New Beginnings Retreat holds itself out as providing "counseling and education for those coming to terms with their gender identity or experiencing difficulties as a result of their gender identification."
18. New Beginnings Retreat is a six (6) bedroom / thirteen (13) resident facility that operates in secret with the assistance of the Cult and its staff.
19. GT is closely tied to KavaSutra whose owner is a federally convicted marijuana dealer/manufacturer.
20. GT holds events at KavaSutra.
21. In June 2017 Robbins finished the extremely intensive Parts 1 and 2 of GT with his children. These two (2) parts spanned nine (9) training days with some training days lasting up to fourteen (14) hours.
22. Robbins finished approximately thirty (30) days of the eighty (80) day Part 3 of GT.
23. On June 22, 2017, Robbins was defrauded at a fundraiser at New Beginnings Retreat.

24. On July 25, 2017, Robbins was asked to leave the Cult after he openly questioned the Cult's practice of not paying students and/or staff for work completed.

25. While Robbins was in the Cult and GT, he observed the Cult's staff treat himself, his sons, and other participants of GT with malice, harm, and offensive, reckless, outrageous, dangerous, and/or criminal behavior.

26. The following are a few examples of such treatment that Robbins witnessed firsthand while in the Cult:

- a. A young woman was bullied by the Cult's staff and GT participants during a GT "exercise" and began slipping into an altered state. She was chased around the conference center by GT staff;
- b. A man with early onset Alzheimer's was berated and bullied by GT staff;
- c. Members of GT who admitted being sexual molesters were permitted to participate fully in the program, and participate in the "exercises," which include group stroking and massaging, lifting members in the air by their buttocks; and skits in which male members wear diapers, women belly dance, and women wear revealing clothing; and
- d. A woman gave so many hours of unpaid service to the Cult and/or GT that she was poverty stricken, and posted on Facebook that she would pose nude for food or money. She was encouraged to do nude photo shoots by the Cult and/or GT staff members and/or business partners.

27. Firsthand witnessing of the Cult's staff harmful, malicious, reckless, outrageous, and/or criminal treatment of himself, his sons, and other participants of GT caused Robbins both physical and mental injuries, including but not limited to chronic headaches, nausea, vomiting, suicidal thoughts, anxiety, and depression.

28. Robbins sought treatment for the mental and physical injuries that were caused by the Cult, GT, and their staff members.
29. Although Robbins has tried to convince his sons to leave the Cult because of the dangers Robbins observed while he was in it, to date, Robbins' sons remain in the Cult.
30. After leaving the Cult, Robbins was isolated by the Cult, and GT staff from his sons and the other participants of GT who he had come to know while in the Cult.
31. After leaving the Cult, Robbins suffered further emotional injuries and anguish due to the distress of what he personally observed while in the Cult; knowing that his sons remained in the Cult and are not getting the licensed and professional help they need; and the distance the Cult intentionally and maliciously placed between Robbins and his sons.
32. Robbins and the mother of Robbins' sons wrote to GT staff about how GT was inappropriate for their sons, and requested that their sons be removed from GT, but those letters were ignored.
33. After leaving the Cult, Robbins immediately began to expose the Cult's corrupt designs and/or its illegal and unethical activities through his blog, WBTruth.blogspot.com.
34. Robbins filed a complaint with the Florida Attorney General and the IRS against the Cult.
35. After Robbins left the Cult, the Cult, GT, and/or their staff members filed meritless claims against Robbins with the police, and wrongfully obtained a restraining order against Robbins based on baseless stalking allegations.
36. After Robbins left the Cult, he learned that the Cult was cyber hacked, but the Cult tried to cover it up.
37. The cyber hacking of the Cult and the cover up of same by the Cult has caused Robbins further physical and emotional injuries and anguish.

38. In October 2017, Robbins witnessed his son, Jack, having sex with a GT staff member in Robbins' home.

39. Witnessing his son having sex with a GT staff member in his home has caused Robbins further physical and emotional injuries and anguish.

40. On October 7, 2017, Robbins' son, Billy, was coerced in GT into dancing in a thong with 60 other scantily clad people. This incident has caused Robbins further physical injuries and emotional injuries and anguish.

41. Since leaving the Cult, Robbins has received death threats, and been the subject of false claims. Robbins' car was also vandalized. Cult members left a dead rat on his doorstep. These threats, violent acts, and harassment have caused Robbins further physical injuries and emotional injuries and anguish.

42. During Robbins' participation in the Cult, he rendered services to the Cult in excess of one hundred (100) hours of his time, but neither Engleson nor the Cult compensated him for any of his time.

43. The Cult asked Robbins to leave the Cult and GT after he openly questioned the Cult's practice of not paying students and/or staff for work completed.

44. At all material times, Engleson and/or the Cult directly and/or indirectly acted as an employer towards Robbins, including without limitation directly and/or indirectly controlling the terms of Robbins' employment.

45. At all times material hereto, Robbins performed duties and/or services for the benefit of and/or on behalf of the Defendants

46. The records, if any, concerning the duties and/or services Robbins provided the Defendants are in the possession and custody of the Defendants.

47. The records, if any, concerning the number of hours of service Robbins provided the Defendants are in the possession and custody of the Defendants.

48. At all times material hereto, the Defendants failed to comply with Fla. Const. art. X, §14, and Fla. Stat. §§ 448.110(3) and/or (5).

49. Prior to bringing this action, Robbins demanded that the Defendants pay him the minimum wages owed to him by the Defendants, but Defendants refused to and continue to refuse to pay Robbins the amount owed to him pursuant to Florida's minimum wage provisions.

50. On October 31, Robbins provided Defendants with his written notice of his intent to initiate an action to enforce the aforementioned minimum wage provisions (hereinafter "Notice"), and copy of such notice is attached hereto as Exhibit "A."

51. More than fifteen (15) calendar days have passed since the Defendants received Robbins' Notice, and the Defendants have not paid the total amount of unpaid wages owed to Robbins.

52. As a direct, legal, and proximate result of the Defendants' aforementioned treatment of Robbins and his observation of the aforementioned treatment of his sons, and other GT participants, Robbins has suffered and continues to suffer physical injuries, extreme emotional distress, mental anguish, pain, and suffering, and loss of enjoyment of life.

53. As a direct, legal, and proximate result of the Defendants aforementioned treatment of Robbins and his observation of the aforementioned treatment of his sons, and other GT participants, Robbins has incurred bills for his treatment of his physical and emotional injuries.

54. Robbins has retained the law office Samuel D. Lopez, P.A. to represent him, and Samuel D. Lopez, P.A. has incurred attorneys' fees and costs in bringing this action. Pursuant to Fla. Stat. § 448.110(6)(c)(1), Robbins is entitled to recovery of reasonable attorneys' fees and costs.

**COUNT I ENGLESSION AND THE CULT –
VIOLATION OF FLA. STAT. § 448.110(3)**

55. Robbins re-alleges and incorporates the allegations in paragraphs 1 through 24, 33-35, and 40-51, and 54, above, as fully set forth herein.

56. Defendants failed to compensate Robbins for any of the one hundred (100) hours of his time during which he provided services to the Defendants.

57. Defendants violated Fla. Const. art. X, §14, and the Florida Minimum Wage Act (hereinafter “Act”) by failing to pay Robbins at least the minimum wage in accordance with Fla. Stat. §§ 448.110(3) for all the hours he worked on their behalf.

58. Robbins was entitled to be paid at least the minimum wage at the rate of \$8.10 for all the hours he worked on the Defendants behalf, which amounts to at least \$810.00.

59. The Defendants knew and/or showed reckless disregard of the Act by its failure to pay Robbins at least the minimum wage in accordance with Fla. Const. art. X, §14 and Fla. Stat. §§ 448.110(3).

60. By reason of the intentional, willful, and unlawful acts of the Defendants, Robbins suffered damages and incurred attorneys’ fees and costs.

61. As a result of the Defendants’ willful disregard of the Act, Plaintiff is entitled to his liquidated damages and attorneys’ fees and costs.

**COUNT II ENGLESSION AND THE CULT –
VIOLATION OF FLA. STAT. § 448.110(5)**

62. Robbins re-alleges and incorporates the allegations in paragraphs 1 through 24, 33-35, and 40-51, and 54, above, as fully set forth herein.

63. The Defendants violated Fla. Const. art. X, §14, and the Act by retaliating against Robbins for exercising his rights, including but not limited to filing complaints against the

Defendants and/or informing third parties of the Defendants' violations of Robbins' rights.

64. The Defendants knew and/or showed reckless disregard of the Act by retaliating against Robbins for exercising his rights in violation of Fla. Const. art. X, §14 and Fla. Stat. §§ 448.110(5).

65. By reason of the intentional, willful, and unlawful acts of the Defendants, Robbins suffered damages and incurred attorneys' fees and costs.

66. As a result of the Defendants' willful disregard of the Act, Plaintiff is entitled to his damages and attorneys' fees and costs.

**COUNT III AGAINST ENGLESON AND THE CULT –
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

67. Robbins re-alleges and incorporates the allegations in paragraphs 1 through 54, above, as fully set forth herein.

68. The Defendants owed a duty to the public, including that of Robbins, his sons, and the other participants in GT, to take reasonable care to own, operate, maintain, and/or manage the Cult and GT with regard to their safety.

69. Defendants were negligent and breached their duties of care to Robbins, his sons, and the other participants in GT.

70. Witnessing the aforementioned horrible treatment of his sons and/or other participants in the GT detailed *supra*, has caused Robbins physical and emotional injuries, including but not limited to chronic headaches, nausea, vomiting, suicidal thoughts, anxiety, and depression, and his resulting damages.

71. The aforementioned threats, violent acts, and harassment inflicted upon Robbins have caused him physical and emotional injuries, including but not limited to chronic headaches, nausea, vomiting, suicidal thoughts, anxiety, and depression, and his resulting damages.

72. The aforementioned retaliation inflicted upon Robbins has caused him physical and emotional injuries, including but not limited to chronic headaches, nausea, vomiting, suicidal thoughts, anxiety, and depression, and his resulting damages.
73. The Defendants had a duty to take reasonable care to protect Robbins, his sons, and the other participants in GT from harm, and/or foreseeable criminal conduct.
74. The Defendants had a duty to Robbins, his sons, and the other participants in GT to maintain GT in a reasonably safe condition, and to warn Robbins, his sons, and the other participants in GT of harm, and/or foreseeable criminal conduct.
75. The Defendants had duty to adequately supervise GT, and enforce any security measures already instituted at the time of the incidents complained of herein and to insure that the security measures were adequate and were being reasonably performed.
76. The Defendants knew or should have known of the criminal activities occurring at their subject premises, KavaSutra, and/or New Beginnings Retreat.
77. The Defendants knew or should have recognized the likelihood of criminal activity that would endanger individuals lawfully present at their subject premises, KavaSutra, and/or New Beginnings Retreat.
78. The Defendants had actual or constructive notice of knowledge of a history of criminal activity occurring at their subject premises, KavaSutra, and/or New Beginnings Retreat.
79. The Defendants, knew or should have recognized that their security measures at their subject premises were inadequate and unreasonable due to the foreseeable risks presented herein.
80. The Defendants, through their agents, employees, officers, board members, staff, administrators, representatives, servants, and/or security personnel, negligently breached their duties to Robbins, his sons, and the other participants in GT by committing one (1) or more of

the following negligent acts of commission and/or omission:

- a. Failure to warn Robbins, his sons, and the other participants in GT of the foreseeable dangers and harm of participation in GT and/or the Cult, KavaSutra, and/or New Beginnings Retreat;
- b. Failure to make reasonable provisions for the safety and security of Robbins, his sons, and the other participants in GT;
- c. Failure to make reasonable provisions for the safety and security of the subject premises;
- d. Failure to reasonably perform its duties to Robbins, his sons, and the other participants in GT;
- e. Failure to adequately screen staff and/or employees who provided services to Robbins, his sons, and the other participants in GT;
- f. Failure to adequately supervise Robbins, his sons, and the other participants in GT under their care to prevent the aforementioned abuse and/or harm;
- g. Failure to adequately classify, separate, and/or monitor participants in GT with behavioral, mental, and/or substance abuse problems from contact with Robbins, his sons, and other participants in GT;
- h. Failure to adequately classify, separate, and/or monitor participants in GT with history of sexual molestation from contact with Robbins, his sons, and other participants in GT;
- i. Failure to provide adequate staffing and/or employees necessary to supervise Robbins, his sons, and other participants in GT;
- j. Failure to have adequate company policies, procedures, and/or training in place to ensure safe and standardized care in the operation of their facilities and/or programs; and for

Failing to follow Florida statutes, regulations, and/or ordinances governing the operation of its facilities and/or programs;

- k. Failure to provide adequate security;
- l. Failure to provide adequate security despite knowledge, actual or constructive, of the unreasonable and unforeseeable risk of harm by conditions occurring at their subject premises;
- m. Negligently exposed Robbins, his sons, and other participants in GT to a foreseeable and unreasonable risk of harm or bodily assault;
- n. Negligently created a foreseeable and unreasonable risk of criminal assault;
- o. Negligently failed to control and adequately supervise their subject premises;
- p. Negligently failed to oversee and/or supervise existing security measures to ensure that such measures were being adequately performed;
- q. Negligently failed to improve any existing security measures that it knew or through the exercise of reasonable care should have known were inadequate and/or ineffective and/or ineffectively performed and/or executed;
- r. Negligently failed to provide reasonable and adequate orientation and supervision to employees, agents, representatives, servants and/or security personnel in order to adequately prepare them for employment at or near the subject premises;
- s. Negligently failed to adopt such other security measures which were necessary and reasonable to protect and safeguard the lives of Robbins, his sons, and other participants in GT at or near its subject premises, and were otherwise negligent in their operation of their subject premises.

81. The Cult is vicariously liable for the negligence of Englesson, and all other Cult staff,

employees, officers, and/or board members.

82. Defendants are negligent per se because the purpose of Florida statutes, regulations, and/or ordinances is to protect the public, including Robbins, his sons, and other participants in GT from the aforementioned harm.

83. Robbins is entitled to an inference of negligence against the Defendants because the aforementioned harm and incidents would not have occurred but for the Defendants' failure to perform their duties to and exercise reasonable care of Robbins, his sons, and the other participants in GT.

84. As a direct, legal, and proximate result of the Defendants' aforementioned treatment of Robbins and his observation of the aforementioned treatment of his sons, Robbins has suffered and continues to suffer physical injuries, mental anguish, emotional and mental damage, and loss of enjoyment of life.

85. As a direct, legal, and proximate result of the Defendants' breach of their aforementioned duties, Robbins has suffered and continues to suffer extreme emotional distress, mental anguish, pain, and suffering, and loss of enjoyment of life.

**COUNT IV AGAINST ENGLESSION AND THE CULT –
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

86. Robbins re-alleges and incorporates the allegations in paragraphs 1 through 54, above, as fully set forth herein.

87. The Defendants' actions were designed to and did take advantage of the vulnerability of Robbins, his sons, and the other participants in GT.

88. The Defendants actions were covered in their scope of employment of Robbins, and were, however misguided, in furtherance of the interests of the Defendants and GT.

89. The Defendants were in a position to inflict grievous harm to Robbins, his sons, and the other participants in GT and the Cult because of the advertised caring attitude and purported purposes of GT and the Cult.

90. The Defendants did inflict grievous harm and emotional distress to Robbins, his sons, and the other participants in GT and the Cult.

91. The actions of the Defendants in their context and positions to Robbins', his sons', and the other GT participants' vulnerability were outrageous and extreme in degree.

92. As a result of the Defendants' aforementioned actions, Robbins suffered physical injuries, humiliation, emotional distress, lasting psychological damage, mental anguish, loss of capacity for enjoyment of life, expense of medical care and treatment, loss of ability to earn money, and/or aggravation of previously existing conditions. Such losses are permanent and/or continuing, and Robbins will continue to suffer the losses in the future.

Demand for Jury Trial

Robbins is entitled to and hereby respectfully demands a trial by jury on all counts stated within and all issues so triable

Relief Requested

Wherefore the Plaintiff, Robbins, hereby requests that this Honorable Court enter a judgment against the Defendants on all counts, and for all of the following relief:

- a. Awarding the Plaintiff his damages including but not limited to his actual damages, liquidated damages, interest, costs, and attorneys' fees;
- b. Awarding the Plaintiff his damages including but not limited to his actual damages, liquidated damages, interest, costs, and attorneys' fees pursuant to the Inherent Powers of the Court;

- c. Enhancing the Plaintiff's award of attorneys' fees by utilizing a contingency risk multiplier, in accordance with Florida Patient's Compensation Fund v. Rowe, 472 So.2d 1145 (Fla. 1985) and Standard Guar. Ins. Co. v. Quanstrom, 555 So.2d 828, (Fla. 1990);
- d. Awarding the Plaintiff prejudgment interest on the relief sought herein;
- e. Awarding the Plaintiff post judgment interest on the relief sought herein; and
- f. Awarding the Plaintiff such further relief as the Court deems equitable and just.

Dated this _____ day of November, 2017.

Respectfully submitted,

/s/ Samuel D. Lopez
SAMUEL D. LOPEZ, ESQ.
Attorney for Plaintiff
Samuel D. Lopez, P.A.
Flamingo Falls Professional Center
1806 N. Flamingo Road, Suite 331
Pembroke Pines, Florida 33028
(954) 523-8565
Email: Sam@samlopezpa.com
Florida Bar No. 102458

Exhibit A

Law Office

SAMUEL D. LOPEZ, P.A.

Samuel D. Lopez
Attorney at Law



October 31, 2017

SENT VIA Federal Express
Josephine Englesson
Gratitude Training, LLC
1901 N Federal Highway, Suite 212
Pompano Beach, FL 33062

Re: Mark Robbins

Dear Ms. Englesson,

I have been retained by Mr. Mark Robbins in connection with Mr. Robbins' claims against you and Gratitude Training, LLC for alleged violations of the Florida Minimum Wage Act 448.110 (3) and (4) Florida Statutes. In advance of filing a civil action in the Circuit Court, Mr. Mark Robbins is hereby providing you with notice of his claims and intent to file a lawsuit. Mr. Mark Robbins further claims you and Gratitude Training, LLC has violated the Florida Minimum Wage Act 448.110 (5) Florida statutes for being asked to leave Gratitude Training by you after openly questioning and encouraging others in Gratitude Training to seek their right to be compensated for work at Gratitude Training, LLC.

Mr. Mark Robbins' is claiming wages in the amount of \$8.10 from June, 2017 through July 2017 for a total of \$810.00.

In addition to the aforementioned claims, Mr. Mark Robbins for Negligent Infliction of Emotional Distress and Negligent Infliction of Emotional Distress. In support of the claims, copy of the unfiled lawsuit is attached to this correspondence.

Having received notice of Mr. Mark Robbins' Claims herein, you under an obligation to preserve all documents and electronic discovery relevant to the allegations in this correspondence. Absent a satisfactory resolution of this matter, in the course of litigation, we will formally request discovery pursuant to Florida Rules of Civil procedure 1.340, 1.370 and 1.351, including electronically stored information. Such information is likely to include, but not be limited to e-mails, word processing, documents, spreadsheets, calendars, network access information, time records, payroll records, quarterly and annual state and federal tax filings, employee policy manuals, personnel files, and other relevant interoffice memoranda. The laws and rules prohibiting destruction of evidence. Because electronic information can be easily deleted, modified or corrupted, you should take every reasonable step to preserve this information until final resolution of this matter.

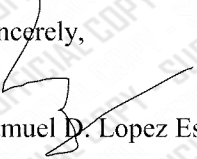
In a good faith effort to amicably resolve Mr. Robbins' claim against you, in lieu of Mr. Robbins proceeding immediately with filing a civil action, I've been authorized to communicate a compromise proposal from Mr. Robbins in the amount of Five Million dollars (**\$5,000,000.00**) in resolution of all of his claims for unpaid wages, liquidated and other damages, attorneys' fees and costs, in exchange for which Mr. Mark Robbins will execute an appropriate release and confidential settlement agreement. The foregoing offer is open through **Thursday, November 16, 2017**, such that I look forward to working with you and/or your attorney within the next two (2) weeks to promptly resolve this matter. However, should an amicable resolution not be achieved,

Flamingo Falls Professional Center
1806 North Flamingo Road Suite 331 • Pembroke Pines, Florida 33028

Telephone: 954-523-8565
Fax: 954-523-0850
Email: Sam@samlopezpa.com

please be advised that we will proceed with the filing of Mr. Robbins' Complaint with the Court and take all necessary action to enforce his rights.

Sincerely,



Samuel D. Lopez Esq.

cc: Mark Robins