

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Index No.: 152397/2026

LINDA JOY GOTTLIEB,
and LINDA GOTTLIEB, TURNING POINTS
FOR FAMILIES, P. C.,

Plaintiff,

**VERIFIED
COMPLAINT**

-against-

PRO PUBLICA, INC., HANNAH DREYFUS
And MICHAEL SQUIRES,

Defendants.

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Plaintiff LINDA JOY GOTTLIEB("Gottlieb") and LINDA GOTTLIEB, TURNING POINTS FOR FAMILIES, P. C., ("TPFF"), by their attorney ROBERT HILTZIK, allege as follows:

PRELIMINARY STATEMENT

1. This is an action for fraudulent inducement, fraud, continuing fraud, fraudulent concealment, tortious interference with existing business relations, tortious interference with prospective business relations, intentional infliction of emotional distress, and negligent infliction of emotional distress arising from Defendants’ publication of false statements and alleged fabrication of statements attributed to Plaintiffs.

2. Defendants’ wrongful conduct includes, but is not limited to, fraudulently inducing Gottlieb to participate in an interview she had previously declined; using that interview for purposes expressly prohibited by Gottlieb and agreed to by Defendants; falsely attributing fabricated statements to Gottlieb and adversely misrepresenting the Plaintiffs’ reunification therapy in five published articles for the purpose of damaging Plaintiffs’ professional reputations and career; falsely claiming the existence of a recording purportedly capturing Gottlieb

discussing a case the Plaintiffs had no involvement or participation in nor knowledge about, and statements Gottlieb never made; refusing repeated requests by Gottlieb and her counsel to produce the alleged recording for, without limitation, forensic evaluation; refusing to retract the false statements when presented with contrary evidence; and continuing to publish and republish the false allegations over a fourteen-month period despite Gottlieb's repeated denials and demands for correction.

PARTIES

3. Plaintiff LINDA JOY GOTTLIEB is a licensed Marriage and Family Therapist (LMFT) and Licensed Clinical Social Worker (LCSW-R) residing in New York County, State of New York.

3. Plaintiff LINDA GOTTLIEB, TURNING POINTS FOR FAMILIES, P. C. is a professional corporation registered in the State of New York, with main offices in 447 Broadway New York, New York County, State of New York.

4. Defendant HANNAH DREYFUS ("Dreyfus") is, upon information and belief, a reporter employed by Defendant PRO PUBLICA, INC. at the time of the incidents in question and, upon information and belief, continues to be employed by Defendant PRO PUBLICA, INC.

5. Defendant PRO PUBLICA, INC. is a Delaware corporation authorized to conduct business in New York with offices located at 55 Broadway, Suite 1920, New York, New York.

6. Defendant MICHAEL SQUIRES ("Squires") is, upon information and belief, an editor employed by PRO PUBLICA, INC.

7. At all relevant times, individual Defendants Dreyfus and Squires acted within the scope of their employment and agency with PRO PUBLICA, INC.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this action pursuant to CPLR § 301 because Defendant PRO PUBLICA, INC. is authorized to conduct business in the State of New York and maintains offices in New York County.

9. This Court has personal jurisdiction over Defendant HANNAH DREYFUS pursuant to CPLR §§ 301 and 302(a)(1), (2), and (3) because, among other things, she transacted business within New York, committed tortious acts within New York, and caused injury to Plaintiffs within New York arising from her transaction of business and tortious conduct directed toward this State, including:

- a. Fraudulently inducing Gottlieb, a New York resident, to participate in an interview conducted for publication by a New York-based media organization;
- b. Publishing and/or causing the publication of knowingly false and defamatory statements concerning Plaintiffs;
- c. Intentionally interfering with Plaintiffs' business relationships and professional opportunities located in New York;
- d. Engaging in conduct that she knew and reasonably should have expected would cause injury to Plaintiffs in New York, where Plaintiffs reside and conduct business; and
- e. Acting within the scope of her employment and agency on behalf of Defendant PRO PUBLICA, INC., a business operating and headquartered in New York.

10. This Court has personal jurisdiction over Defendants MICHAEL SQUIRES pursuant to CPLR §§ 301 and 302(a)(1), (2), and (3) because he transacted business in New York, participated in and approved the publication of the false statements complained of herein, and engaged in tortious conduct directed toward Plaintiffs in New York, including:

- a. Participating in the publication and republication of false and defamatory statements concerning Plaintiffs, New York residents;
 - b. Participating in and/or ratifying the continued publication and concealment of the wrongful conduct alleged herein; and
 - c. Acting as officers, employees, editors, and/or agents of Defendant PRO PUBLICA, INC. within the scope of their employment and authority.
11. Venue is properly placed in New York County pursuant to CPLR § 503 because:
- a. Defendant PRO PUBLICA, INC. maintains its principal office and regularly conducts business in New York County;
 - b. A substantial part of the events and omissions giving rise to the claims occurred in New York County;
 - c. The publications at issue were prepared, edited, approved, and/or published from New York County; and
 - d. Plaintiffs reside and conduct business in New York County.

FACTUAL ALLEGATIONS

12. Defendants HANNAH DREYFUS, PRO PUBLICA, INC., and MICHAEL SQUIRES (collectively, “Defendants”) engaged in a deliberate, coordinated, and multi-stage scheme sounding in fraud, fraudulent concealment, and tortious interference, with the intent and effect of damaging Plaintiffs’ professional reputations, practices, and business relationships.

13. Over a fourteen-month period, from February 26, 2023, through April 8, 2024, Defendants published a series of five articles constituting a calculated and escalating campaign directed at Gottlieb and TPF, Gottlieb’s specialized treatment program, and engaged by courts throughout the United States in cases involving severe parental alienation.

14. This coordinated publication campaign was characterized by:

- Premeditated malice toward Plaintiffs;
- A reckless and knowing disregard for the truth and accepted journalistic standards;
- A specific intent to interfere with Plaintiff's existing and prospective business relationships;
- A pattern of knowingly false statements and misrepresentations;
- Continued publication of defamatory material despite repeated notice of falsity and demands for correction; and
- Efforts to conceal prior misconduct through the publication of additional articles reinforcing the same false narrative rather than issuing retractions even when they had become aware of contradictory facts.

15. In furtherance of this scheme, Defendants engaged in a sustained pattern of fraudulent and tortious conduct, including, but not limited to:

- Attributing statements to Gottlieb that Defendants knew to be false;
- Attributing known mischaracterizations to the TPDF program;
- Fabricating and/or misrepresenting the existence of a purported recording falsely alleged to be of Gottlieb, containing statements regarding a case that was not hers and of which she had had no knowledge that, if genuine, would have violated HIPAA and professional confidentiality obligations;
- Falsely imputing abusive conduct toward children to Plaintiffs and their therapeutic practice;
- Refusing repeated requests by Gottlieb and her counsel to produce the alleged recording for forensic voice and facial analysis; and
- Continuing to publish and republish and failure to retract false statements and known malpresentations despite Plaintiffs' repeated denials and notice of falsity and despite having received facts to the contrary.

16. The campaign consisted of the following five articles, each building upon and reinforcing the false narrative established in the prior articles:

**Article One (ProPublica, February 26, 2023, by Hannah Dreyfus):
“Barricaded Siblings Turn to TikTok While Defying Court Order to Return to Father
They Say Abused Them.”**

17. This article falsely attributed the Utah TikTok case to Plaintiff’s practice; fabricated quotes, statements, and misstatements that they attributed to Plaintiffs concerning protective orders in order to quash children’s report of sexual abuse; that TPFf is a “camp”; falsely claims that Gottlieb sequesters children in an “undisclosed location”; falsely claims that it is Gottlieb and not the courts who prohibit contact with the other parent and that parent’s family members for 90 days; falsely claims that Courts’ demand for TPFf prompted her to open two additional locations in Texas and in California; falsely claims that Gottlieb accepts substantiated cases of child abuse into her treatment “camp:”

“Two siblings in Utah have barricaded themselves in a bedroom at their mother's home in defiance of a judge's order to return to the custody of their father, despite state child welfare investigators determining that he had sexually abused the children. In 2018, Utah's Division of Child and Family Services found that the father, Brent Joel Larson, had sexually and emotionally abused his children. Investigators categorized the abuse as "severe & chronic."

“The so-called reunification camp that Ty and Brynlee have been ordered to attend with their father, Turning Points for Families, is run by Linda Gottlieb, a New York-based social worker who markets her program as a "therapeutic vacation.””

18. These statements contained in Article One are patently false. Neither myself nor my company had any involvement in the Utah matter whatsoever and had no information about the case to have provided information to Dreyfus.

19. That Turning Points agency is operated and owned by another person, unrelated to me and my Turning Points.

20. This same article contains the following:

Gottlieb's services include taking the children to an undisclosed location for a four-day sequestration period. During treatment, the children meet with the "unjustifiably rejected" parent. Afterward, they remain in the alienated parent's custody for 90 days and are prohibited from having contact with the other parent or related family members.

21. There are no “undisclosed locations”.

22. Everyone involved knows where the therapy is taking place.

23. That the program requires the child or children not to have contact with the other parent accused of mistreating the children is ordered by the Court.

24. This is the program the Court selected and ordered. There are, of course, options available to the Courts. The Court has the authority to shorten the time and even extend the time, which some courts have done.

25. In that same article:

Some defenders of parental alienation claim an absence of abuse or neglect is necessary for the diagnosis, but others, including Gottlieb and Jones, accept cases involving allegations of abuse, including when abuse has been substantiated by authorities, like in the Larson case.

“Gottlieb said determining child abuse has occurred is the responsibility of

the courts. 'Turning Points only accepts cases by court order,' said Gottlieb, adding that demand from courts has prompted her to scale up operations and open two new locations in Texas and California. 'The court had to have already made the determination that the child is safe with the alienated parent and that abuse didn't occur – or that it was so long ago that it was remediated.'

26. The claim that Gottlieb “accepts cases” when there has been a finding of abuse by the parent whose relationship with the children has been interfered with is false.

27. Gottlieb and Turning Points have never accepted any cases when there has been such a finding before they were appointed.

28. It is worth noting that often the parent interfering with the other parent’s relationship will manufacture claims of abuse to justify their conduct, claims that the courts find are not substantiated before the Plaintiffs are appointed.

29. By definition, it cannot be a case of alienation if the rejected parent has engaged in abusive and/or neglectful behaviors so the case would not be accepted into the TPF program if the rejected parent engaged in such behaviors as determined by the Court.

30. The article falsely associated Gottlieb and TPF with the Utah custody matter discussed in the article, despite Plaintiffs not being involved in that matter.

31. The falsely attributed statements to Gottlieb concerning the Utah matter, including statements suggesting that Gottlieb advocated restricting children and parents from speaking publicly about custody disputes involving substantiated allegations of child abuse.

32. Similarly, Gottlieb never said that “demand” had her open new locations in Texas and California. Two separate therapists asked if they could establish their own, independent programs using the name “Turning Points for Family”. Gottlieb let them use the name but

otherwise has no affiliation, ownership, or participation in those programs. Nor does she advocate for courts to use those programs.

33. Gottlieb made no such statements in her interview with Dreyfus, and Dreyfus knew this to be true when she wrote the article.

34. These statements cannot be found on the one and only true interview that Gottlieb gave to Dreyfus over Zoom, and the interview was recorded:

In an interview with ProPublica, Gottlieb said she is dismayed at how social media is being used to attack her program and others like it. "We can't have what happened in Utah," said Gottlieb, who said she will be requesting that courts that refer minors to her program issue orders prohibiting parents and children who resist from speaking publicly about their cases.

35. In her interview with Dreyfus, Gottlieb never mentioned the Utah Tik Tok case nor did it come up during the interview.

36. Gottlieb never made those statements and never discussed the Utah matter with DREYFUS.

37. This article, in addition to the four subsequent articles, gives the impression that Gottlieb and TPF as engaging in practices that harm children in order to enrich Gottlieb's bottom line.

38. Gottlieb has been confronted with this falsity of harming children for the sake of the TPF program fee multiple times by opposing counsel, who cite the ProPublica articles in support of this falsity.

39. Defendants published the article despite possessing information contradicting the completely negative characterizations of what is known as "parental alienation", including

scientific literature, professional materials, and information that had been provided by Gottlieb and Gottlieb's colleagues—all of which provided contradictory facts to what the Defendants wrote about alienation in the article:

A judge concluded the children were victims of "parental alienation," which continues to influence family courts despite being rejected by mainstream scientific groups, and authorized police to use "reasonable force" to remove them from their mother.

Mainstream scientific groups, including the American Psychiatric Association, which compiles the Diagnostic and Statistical Manual of Mental Disorders, and the World Health Organization, which publishes the International Classification of Diseases list, have rejected the theory and said it is not a legitimate diagnosis.

Dr. David Corwin, a professor and director of pediatric forensic services at the University of Utah and the past president of the American Professional Society on the Abuse of Children, said parental alienation - which he described as "an ideology that is not based upon adequate research" - is too often an "easy sell" to courts seeking an alternative explanation for abuse claims. It really is one of the best defenses against accusations of sexual abuse, "said Corwin, who co-authored a position statement for his society in January warning professionals against its use in child custody decision-making.

40. As mentioned, the Defendants were given literature and studies that supported the fact that often times one parent manipulates and influences the child against the other parent.

41. Whether you call it "parental alienation" or "interference with parental relationships", the concept is the same and it is real.

42. It cannot be denied that in high conflict custody matters, one parent weaponizes the child against the other parent. That such conduct can be considered abuse is accepted, as a child is forced to side with one parent over the other. Naturally this creates conflict and anxiety in a child.

43. That being said, the concept of “parental alienation” has not been dismissed.

44. In the article Dreyfus quoted a single source, whose qualifications to opine on alienation—if any at all—are not cited. Dreyfus simultaneously failing to cite a single reference among a huge catalog of peer-reviewed research and the psychiatric and legal literature that had been provided directly to her by Gottlieb and by her four colleagues—all of whom have been qualified hundreds of times, if not thousands of times, in courts across the US and Canada as experts and specialists in alienation.

45. Dreyfus reported knowingly false information that the American Psychiatric Association and the World Health Organization “*rejected the theory and said it is not a legitimate diagnosis.*”

46. That simply is not accurate, and she failed to cite a single reference to support that claim.

47. Dreyfus did not provide or mention a single reference to the contrary from the extensive peer-reviewed literature and research she received from Gottlieb and her four colleagues.

48. The entire reason Gottlieb agreed to the interview was Dreyfus’ fraudulent inducement that she intended to write all perspectives on parental alienation and intended to dispel any misinformation concerning that concept.

49. Gottlieb notified Defendants that the article contained false statements and fabricated quotations falsely attributed to Gottlieb.

50. Gottlieb repeatedly advised Defendants that she had never discussed the Utah matter and had never made the statements attributed to her in the interview.

51. Though Defendants maintained that she did, they have still refused to turn over the tape of that interview.

52. In June 2023, Defendant MICHAEL SQUIRES, an editor at ProPublica, contacted Gottlieb and asserted that recordings existed allegedly containing additional statements by Gottlieb concerning the Utah matter.

53. Those “recordings” have never been produced.

54. SQUIRES quoted purported statements allegedly made by Gottlieb in a recording she never made and that had never appeared in the original article, and that Gottlieb denies making.

55. Gottlieb demanded production of the alleged recordings so that independent forensic voice and facial analysis could be performed.

56. Gottlieb also demanded preservation of all recordings, transcripts, notes, communications, and electronically stored information relating to the interview and publications.

57. Defendants refused to produce the alleged recordings despite repeated requests by Gottlieb and later by Plaintiffs’ counsel.

58. Instead of producing recordings, Defendants continued asserting that Gottlieb had made the disputed statements and continued publishing and republishing the allegations.

59. On October 31, 2023, Sarah Matthews, acting as Deputy General Counsel for ProPublica, again refused to produce the recordings and instead supplied additional purported

quotations to Gottlieb’s attorney allegedly made by Gottlieb in the recording that Gottlieb never made concerning the Utah matter.

60. The alleged quotations attributed to Gottlieb expanded over time, including statements never previously disclosed and details concerning a case with which Plaintiffs were not involved and of which they had had no knowledge at the time.

61. Defendants nevertheless refused Gottlieb’s requests for independent forensic analysis of the alleged recordings.

62. Defendants’ refusal to produce the recordings, despite repeated demands and offers for independent verification, demonstrates Defendants’ knowledge of falsity and consciousness of wrongdoing.

**Article Two (ProPublica, May 18, 2023, by Hannah Dreyfus):
“A Court Ordered Siblings to a Reunification Camp With Their Estranged Father. The
Children Say It Was Abusive.”**

63. Despite acknowledging in this article that Gottlieb had not been court appointed to, nor was involved in the Utah Tik Tok case, Defendants failed to retract their defamatory, misrepresented statements against Gottlieb that had been made in Article One, said article published while Defendants were aware of Plaintiffs’ claims of fabrication and falsities contained in Article One, with Defendants refusing to produce the alleged recording of Gottlieb’s interview.

64. Dreyfus repeats in this article the false claim that parental alienation lacks scientific support—evidence of her intended fraudulent mission all along—and of which she had deceived Gottlieb in order to induce her to grant an interview.

65. After having received a wealth of information from Gottlieb’s four colleagues of the scientific and legal recognition of parental alienation and that it is dysfunctional conduct that abuses children. Dreyfus writes in this article:

Outside the courtroom, the ailment that the programs claim to heal — parental alienation — has struggled to gain legitimacy. Medical and psychological professionals, including the American Psychiatric Association, have rejected it as a mental disorder. And the special report released by the United Nations Human Rights Council blasted parental alienation as a "pseudo-concept" and recommended member states prohibit its use in family courts.

66. If “parental alienation” is not deemed to be a “mental disorder”, that does not deny the fact that parents conduct themselves towards the goal of influencing the child to not respect, even like the other parent.

67. That type of weaponization has been shown to affect a child’s normal and healthy development.

68. Dreyfus again falsely and strategically labels Tuning Points a “camp”—a label that she deliberately employed to garner extensive opprobrium over the internet and on social media platforms against Gottlieb and TPDF, labelling the TPDF program as one that abuses children.

69. Such “reporting” has brought Gottlieb criticism, hostility, and even threats from the general public, loss of retention by prospective clients and by lawyers.

70. Dreyfus persisted in re-publishing this “camp” label despite having been informed by Gottlieb and by her 4 colleagues that Turning Points is not a camp; that it is a therapeutic program during which time Gottlieb treats only one family at a time.

71. Dreyfus again ignored the scientific and legal recognition for parental alienation by calling it a disputed psychological theory; she failed to cite the “credentials” and “qualifications” of those who she claims dispute the concept of parental alienation. There are still some “flat earthers” around.

72. This is what Dreyfus wrote in Article Two:

One Thursday afternoon in December, a father and two of his estranged children boarded a flight from Salt Lake City to Texas, beginning an effort to repair their fractured relationship. A family court official had ordered them to attend a reunification camp, Turning Points for Families Texas, to repair damage that the judge said the boys' mother had inflicted by alienating them from their father.

The camp claims to remedy parental alienation, a disputed psychological theory in which one parent is accused of brainwashing a child to turn them against the other parent.

73. Again, this Texas Turning Points is not owned or operated by Gottlieb. It is independent, just like a Wendy's or McDonalds could be independently owned and operated.

74. That being said, when a court determines that one parent is interfering with the child's relationship with the other parent, in order to “cure” the consequences of that interference, courts have selected the Turning Points program, as well as other therapeutic options, to try to repair the damage that the other parent has caused to the children and to the children's relationship with the other parent.

75. Dreyfus lodges meritless attacks on family court judges—falsely claiming that they relinquish their authority to Turning Points or those running the “camp” to frivolously decide if and when a parent can have contact with their child, the legitimacy of alienation and the TPDF program.

76. This is what Dreyfus wrote:

Programs like Turning Points, in effect, allow overburdened family court judges to outsource some of that difficult decision-making: An order to participate effectively transfers to the person running the camp the power to decide if and when a parent can contact their child, regardless of the court's previous custody rulings. This transfer of power generally lasts from the time the court order is issued until the camp director determines the treatment has been successful."

77. This claim is utterly false, and Dreyfus knew that when she reported this. She had obtained the court orders with the findings of facts and the law that were the basis for the court order for the Texas TPFf in the Utah Tik Tok case.

78. The fact that she did not report the findings of fact goes to her true intentions to undermine the treatment program of Turning Points, a program that has successfully reunited estranged parents with their children.

79. Dreyfus again ignored the research study and information she had received from Gottlieb and her four colleagues that TPFf is safe and 96.4% effective in reconnecting children and their severely alienated parent, that three other studies on two other similar programs resulted in the same research findings, and that the alienating parent's violation of the Court-ordered no contact period accounted for the 3.6% non-reunifications.

80. Dreyfus still reported the falsity that "little is known about TPFf." Dreyfus fails to report who the alleged "experts" are who claimed that the TPFf treatments are "controversial" and "frequently fall short."

81. The fact is, not a single alleged expert who has talked negatively about TPFf ever interviewed Gottlieb about her program and what her interventions involved.

82. Also of note, the Court held status conferences or hearings on the cases of the 199 children who had participated in Gottlieb’s TPF program.

83. Not a single child was found by the Court to have been traumatized by the intervention, and any issues arising subsequent to the intervention was due to violation of court orders by the alienating parent.

84. When the alienating parent did not sabotage the intervention or after care treatment by the local family therapist, the courts found that the intervention achieved the intended purposes.

85. Despite having this information, Dreyfus wrote the following known falsities in article 2:

Despite family courts' frequent use of Turning Points for Families, little is publicly known about the program, which was founded by New York-based social worker Linda Gottlieb, who describes the intervention as a "therapeutic vacation." But its treatments are controversial and frequently fall short of addressing the underlying causes of broken family relationships, experts told ProPublica.

86. Dreyfus makes no mention of who these “experts” are, why the program is “controversial” and provides no proof that the program does not address the “underlying causes of broken family relationships”.

87. The fact is that Turning Points is enlisted by the courts because the court has already determined that one parent has caused a “broken relationship” between the children and the other parent, and that relationship needs to be repaired.

88. Despite Dreyfus's defamatory and salacious attacks on Gottlieb in the 2/26/2023 Article One, falsely connecting Gottlieb to the Utah TikTok case, Dreyfus never retracted these falsities even though she acknowledges the falsity in this second article that the case.

89. Instead, she moved on to an unrelated Texas program. Dreyfus further selectively reported about the outcome of the legal proceedings in that Texas case to give the impression that was opposite of the facts of the case. Dreyfus writes:

ProPublica reported this year on another Utah case involving siblings who barricaded themselves in their bedroom to avoid being sent to the same Texas program. A judge subsequently backed down on an order mandating that they return to their father.

90. Dreyfus strategically and deceptively left out of her reporting that the judge returned the children due their threats of self-harm or running away and not because of any unsafe behaviors on the part of the alienated parent or the TPF program.

91. It is common for the interfering parent to manipulate their children to force the court to make a change.

92. Dreyfus reported knowingly false information about the research study on TPF by stating the following:

A 2021 evaluation led by Jennifer Jill Harman, an associate professor of psychology at Colorado State University who believes parental alienation is a genuine diagnosis, analyzed video recordings of Gottlieb's intervention with 15 families. Based on Gottlieb's "self-reported" success during the intervention itself, the evaluation found the program was safe and had a 96% rate of effectiveness.

93. Dreyfus had been informed by Gottlieb and Harman that the only role Gottlieb played in the study was to provide Harman with the videos of the therapy sessions from the alienated parents who had signed consents.

94. Dreyfus knew her reporting was false because she had further obtained from Colorado State University the legally available disclosures about how the study had been conducted.

95. Dreyfus further strategically reported incomplete information about the study. There were 55 children who had participated in the study, but Dreyfus did not include this number in her article—instead citing the irrelevant number of 15 families having participated.

96. It was the population of alienated children that was the relevant population to the study because the study's purpose was to determine how the children behaved with and reconnected to their alienated parent.

97. While an N-population of 15 does not typically produce a meaningful study, an N-population of at least 25 does, and the TPDF study had an N-population of 55.

Article Three (ProPublica, May 26, 2023, by Hannah Dreyfus; republished June 3, 2023, in Southwest Connector): "Colorado Becomes the First State to Limit Court Use of Family Reunification Camps."

98. This article perpetuates the misinformation and disinformation about parental alienation and about TPDF.

99. As mentioned, Dreyfus had been provided with the research and scientific and legal literature to the contrary.

100. It reveals her true fraudulent purposes to interview and trick her to comment on the sensationalized TikTok case, and twist and falsely report Gottlieb's comments in order to

support Dreyfus' preconceived, inflexible, and biased negative beliefs about alienation and reunification therapy.

101. Dreyfus again reported in this article that alienation is rejected in mainstream scientific circles, ignores the overwhelming scientific and legal research and literature to the contrary, and imputes the falsity that the TPF program isolates children from a "trusted caretaker":

A bill signed into law this week in Colorado prohibits family courts from ordering children to participate in reunification programs that isolate them from a trusted caregiver. Many of these programs purport to offer treatments for parental alienation, a psychological disorder that has been rejected by mainstream scientific circles but continues to influence custody decisions.... State lawmakers have credited ProPublica's reporting for exposing the need for reforms.

102. This is a highly deceptive comment.

103. Alienating parents have coercively manipulated their children to be dependent upon them and must "trust them", versus the alienated parent who they tell the children cannot be trusted.

104. But the relationship between the child and alienating parent is not healthy; to the contrary, that relationship creates severe psychiatric conditions for the child.

105. Dreyfus brings up another case where the court enlisted a Turning Points program:

For Valarie Underwood, a Colorado mother who attended a ceremony for the bill's signing, the issue is personal. She had full custody of her children until August, when a magistrate in Weld County, Colorado, ordered the children to

attend Turning Points for Families, a reunification program directed by New York-based social worker Linda Gottlieb. Magistrate Annette Kundelius had concluded the children were victims of "severe parental alienation" and the reunification program was needed to repair their relationship with their father. Kundelius was not available to comment, according to her clerk. They've not been allowed to return home or regularly communicate with or see Underwood since then.

Such orders effectively supersede the court's parenting arrangement by transferring to the person running the program the power to decide if and when a parent can contact their child, regardless of the court's previous custody rulings. The "no-contact" period lasts a minimum of 90-days, according to the program's protocol, though courts frequently give Turning Points counselors the power to prolong treatment indefinitely — until the program counselor determines the treatment has been successful.

106. Though Dreyfus was in possession of the court's findings of facts and the law in the Underwood case, she deliberately and strategically failed to cite any of those findings that had served as the basis of the court's order for the TPF intervention.

107. She relied exclusively on the one-sided reporting of the parent who lose custody of her children, reasonably knowing that such parents do not report the full story and distort the facts of the case, rather than indict themselves.

108. The fact is that in such alienation proceedings, the courts judiciously weigh all the evidence in a case before removing children from a parent and denying that parent all contact with the children.

109. Further in Article Three, Dreyfus again makes the false claim that courts relinquish decisions on custody and visitation to the whims of the TPFf therapist—even if the TPFf therapist ignores the court’s prior rulings on custody.

110. The TPFf therapist has no authority to determine custody or visitation. Only the court can make those determinations.

111. The TPFf therapists simply report the progress of the parental relationship with the children to the court, as well as the participation, or lack thereof, of the parent that has been accused of interfering with that relationship.

112. Dreyfus knowingly reports incorrectly about the criteria for rendering expert opinions to the court—which does not require direct interviewing of the parties and children. Dreyfus implies that the court in the Colorado case was remiss on its ruling for the TPFf intervention:

Jennifer Harman, an associate professor of psychology at Colorado State University who defends parental alienation as a genuine disorder, testified on behalf of the father and advised the court to send the children to Turning Points.

Despite never having met the children before her court testimony, she said they had been severely alienated by their mother, according to court documents.

113. In support of her agenda to bring down Gottlieb and TPF, Dreyfus reaffirms and reiterates the known falsities about the TPF program:

In 2021, Harman published an evaluation of the Turning Points program in which she found it to be safe and effective she later clarified that the program's high success rate was self-reported by Gottlieb, who also helped design and execute the evaluation of her own program.

114. Upon information and belief, Harman repeatedly told Dreyfus that Gottlieb's only role in the study was to provide the videos of those families in which the alienated parent had given consent.

115. Harman told Gottlieb that Dreyfus was determined to disregard the truth that Gottlieb had played no role in the findings of the study.

116. Dreyfus further "reports":

Gottlieb has previously defended her methods and called ProPublica's reporting libelous but not Identified any inaccuracies in the reporting.

117. Dreyfus blatantly lied that Gottlieb had not made it explicitly clear to all three Defendants and to the entire Board of Directors at ProPublica as to what the bases were for their ongoing libelous reporting about alienation, TPF, and about her.

118. Despite Gottlieb's numerous complaints and provision of evidence, the Defendants not only failed to retract the libelous falsities, but they also perpetuated them over a 14-month period of time.

119. Dreyfus reiterated yet again the known falsity that Gottlieb stated she had opened two new locations to meet the demand of the Courts for her program, which has already been addressed above:

She has told ProPublica that Turning Points only accepts cases by court order, and that demand for her program has prompted her to add new locations in Texas and California.

120. As mentioned above, Gottlieb never made such a comment about “opening programs” in Texas and California.

121. Dreyfus reported:

After 90 days, the court granted the father's request to extend the no-contact period. The family was ordered to continue the Turning Points treatment with Sharon Feder, an unlicensed therapist.

122. Gottlieb and her Turning Points were not directly involved in this matter. The court appointed Ms. Feder, without any involvement from Gottlieb.

123. At the time, Dreyfus knew, or should have known, that it was the court that extended the no-contact period, yet she fails to retract and correct her repetitive false reporting about this.

124. She also fails to cite Ms. Feder’s court accepted credentials and repeated court appointments to provide reunification therapy, thereby implying that Gottlieb approves follow-up care with unqualified providers.

125. Regarding the case that Dreyfus discussed in Article Three, she failed to seek the father’s meaningful accounting of the family history and court findings.

126. He and his lawyer reported to Gottlieb that he offered to sit for a lengthy interview with Dreyfus given the long history of the case, but that Dreyfus offered him a maximum of 5 minutes, which the father felt would not due him justice, so he declined the 5-minute interview.

127. The father pointed out to Gottlieb that it was clear to him that Dreyfus had offered the mother significant time for her interview given the length of the reported story.

**Article Four (Pro Publica, 5/19/2023, by Hannah Dreyfus):
"Parental Alienation: A Disputed Theory With Big Implications: The impact of
junk science in criminal cases is well known, but family courts have allowed a disputed
psychological theory to persist with little scrutiny."**

128. This article—as exemplified by its subtitle—provides the evidence for Dreyfus’s true agenda to bash the concept of “parental alienation”, rather than present both sides of the “argument” concerning same.

129. The fact remains that Dreyfus had no intention to report about what she had learned from Plaintiff’s colleagues but instead interviewed them for the deceptive purpose of inducing Gottlieb to grant the 2/1/2023 Zoom interview.

130. Dreyfus writes:

ProPublica has been reporting on family courts' handling of custody disputes that involve allegations of child or domestic abuse. The reporting shows that a disputed psychological theory that's been rejected by mainstream scientists has widespread influence on outcomes in family court and cited as evidence in divorce and custody cases, even though most mental health professionals reject it as junk science.

131. This article reveals that, at the time of the 2/1/2023 Zoom call between the parties, Dreyfus had already developed her biased, intractable, and adverse views of parental alienation.

132. Dreyfus again falsely claims in this article that parental alienation lacks scientific and psychiatric support, is accepted by few professional groups, and reveals Dreyfus’ pre-conceived, inflexible, and committed mission to undermine the concept of alienation and defame and bring down Plaintiff and her TPF program.

133. Dreyfus goes on to further her agenda by attempting to defame the child psychiatrist to have first labeled the phenomenon of “parental alienation”, implying that he sacrificed child protection for making money, and attributes these false claims to those who follow in his footsteps like Gottlieb:

Gardner developed the theory of parental alienation syndrome, a condition in which children wrongly believe they are being abused, and recommended courts treat the children by placing them in the custody of the parent accused of abuse. "Severe" cases, he argued, required "threat therapy" to disabuse children of their distorted beliefs.

Few mainstream professional groups have accepted it as a diagnosable condition. But today: programs across the country claim to treat parental alienation using similar techniques, according to a ProPublica investigation. These programs, which can cost \$15,000 or more for a four-day intervention, are court-ordered. Contemporary advocates of the theory vary in their allegiance to Gardner and his version of parental alienation as a syndrome. Some classify it as a "relational disorder" rather than a syndrome. Others continue to defend Gardner's conceptualization of parental alienation syndrome, despite Gardner coming under fire in the 1990s for arguing that pedophilia has benefits for human survival.

A primary concern among those who oppose the use of parental alienation in the court is that it misrepresents evidence that would otherwise indicate child abuse.

134. Dreyfus again repeats and reiterates the unscientific basis for the denial of alienation—despite being informed by Gottlieb and her four colleagues to the contrary.

135. To reiterate, Dreyfus’ fraudulent misrepresentation to Plaintiff that she intended to report the scientific support for alienation and its recognized treatment was how she induced Gottlieb to grant an interview she had previously declined.

136. There is no “misrepresentation” of evidence that would suggest “child abuse”. The proof that one parent is interfering with the relationship of the child with the other parent is the proof of abuse.

**Article Five (ProPublica, April 8, 2024, by Michael Squires):
“New Utah Law Prioritizes Child Safety in Custody Courts.”**

137. In this article, Defendant SQUIRES reveals ProPublica’s true mission to bring down reunification programs like TPF, TPF itself, and Plaintiff Gottlieb, implying that Plaintiff and her colleagues fail to address allegations of domestic violence.

138. This article is further evidence of Dreyfus’s fraudulent inducement of Gottlieb, that the Defendants had absolutely no intention to report fairly, unbiasedly, and about the scientific support for alienation.

139. The article’s subtitle said it all:

The legislation, which limits the use of reunification therapies and increases scrutiny of expert witnesses, follows ProPublica’s reporting on courts’ handling of custody cases involving allegations of violence.

140. The Defendants repeated the lies and misinformation about Gottlieb of which they had been repeatedly advised were false and defamatory.

141. Despite Gottlieb’s repeated requests for the alleged recording of her, SQUIRES wrote the following article 14 months after Dreyfus’ disputed first article.

142. He further provided hyperlinks to these disputed articles.

143. What makes SQUIRES reporting particularly fraudulent is that the court ruling on the TikTok case had already been published publicly, was in his possession, and it disputed all of Dreyfus' reporting.

144. In fact, Dreyfus audited the final custody proceedings and heard all the evidence upon which the judge disputed all her reporting about this case.

145. Yet, SQUIRES repeated the falsities:

The legislation follows ProPublica's reporting on Utah courts' handling of custody cases involving allegations of violence. That reporting showed judges had in two instances ordered children to participate in so-called reunification therapy with fathers who had been accused of abusing them. Both fathers have denied the abuse allegations and responded by accusing their ex-wives of parental alienation, a disputed theory in which one parent is accused of brainwashing a child to turn them against the other parent. In one case, a boy who accused his father of sexually abusing him barricaded himself, along with his sister, inside a bedroom in their mother's home to avoid going to a Texas reunification program with their dad. In another, two brothers were ordered to attend the same Texas program with their dad, whom they said had abused them. When they refused to take part in the therapy, their bedding, food and clothing were confiscated, according to court testimony, and they were prohibited by court order from contacting their mother for months. Under the new Utah law, courts can only require treatments that have been shown.

146. *SQUIRES* repeated and reiterated Dreyfus' reporting in her prior articles providing probative evidence for ProPublica's mission to bring down reunification programs:

Any type of reunification therapy has to have proof of safety and electiveness," said state Rep. Paul A. Cutler, a Republican and co-sponsor of the legislation, known as HB 272.

"No more sending kids out of state to some unknown camp run by uncredentialed people — can't do that anymore — only proven therapeutic treatments by professionals."

State Sen. Michael K. McKell, the bill's other co-sponsor and a practicing attorney, said in his experience the same attorneys often work with the same experts to counter abuse allegations by citing parental alienation.

147. The timing, repetition, escalation, and cross-referencing of these articles over a fourteen-month period demonstrate Defendants' premeditated intent to inflict reputational and economic harm upon Plaintiffs.

148. Each article was published despite Defendants' knowledge of the falsity of the statements contained therein and after Gottlieb had informed Defendants of said falsity and had demanded corrections and retractions.

149. Defendants' refusal to produce the alleged recording of Gottlieb's February 1, 2023, interview, while continuing to publish additional defamatory articles, further evidences the nefarious intentions of the Defendants.

Fraudulent Inducement by Defendant Dreyfus

150. Defendant Dreyfus initiated the defamatory campaign through a fraudulent scheme to induce Gottlieb to participate in an interview under false pretenses.

151. In late January 2023, Dreyfus contacted Gottlieb via cell phone after conducting interviews with several of Gottlieb's colleagues in the field of parental alienation and

interference with parent-child relationships, including, without limitation, Brian Ludmer, Ashish Joshi, Demosthenes Lorandos, and Amy Baker.

152. Dreyfus represented that she was seeking to educate herself about “parental alienation” in order to write accurate, balanced articles on the subject and to counter widespread misinformation.

153. These representations were knowingly false and known to be false by Defendant Dreyfus at the time they were made by her. Dreyfus knew that Gottlieb would rely upon Dreyfus’ statements at that time and would believe same to be true.

154. On or about February 1, 2023, Gottlieb participated in Dreyfus’s Zoom “introductory conversation” after Dreyfus reaffirmed that the call was solely for background purposes, that she had no imminent plans to publish an article on alienation or any specific case involving parental alienation, and that no comments by Gottlieb would be published without the express permission of Gottlieb.

155. Gottlieb explicitly conditioned her participation on these terms and made clear that she would not discuss any specific case nor be connected to a specific case due to confidentiality and HIPAA obligations.

156. In an email dated January 30, 2023, and again in a February 15, 2023, email, Dreyfus confirmed the limited, introductory nature of the call.

157. Unbeknownst to Gottlieb, Dreyfus had already been actively investigating and preparing the February 26, 2023, article concerning the Utah case (Article One) and concealed her true intention to elicit and use and/or fabricate Gottlieb’s comments for that imminent article she was preparing.

158. After the February 1, 2023, call, Gottlieb declined Dreyfus's repeated requests for a follow-up interview. On February 15, 2023, Dreyfus admitted in writing that she wished to discuss the developing Utah story with Gottlieb while continuing to misrepresent the nature and purpose of the original interview.

159. On February 17, 2023, Gottlieb again expressly withdrew any consent for publication of her statements from the February 1, 2023, interview and directed Dreyfus that she was not to use any of her statements made during that interview.

160. Despite this, Dreyfus published Article One on February 26, 2023, which contained false comments and fabricated statements attributed to Gottlieb.

161. Dreyfus's subsequent articles (Articles Two, Three, and Four) continued and amplified the defamation, all while Defendants refused to produce the alleged recording of the interview despite repeated demands.

162. This pattern of conduct constitutes fraudulent inducement, fraudulent concealment, and demonstrates actual malice.

ADDITIONAL FACTS COMMON TO ALL CAUSES OF ACTION

Plaintiff's Professional Practice

163. Gottlieb is a licensed mental health professional and the founder of TPDF, a therapeutic reunification program utilized by the Courts across the US and internationally in custody matters involving allegations of interference with the parental relationship and parental alienation and provided the TPDF intervention only by Court order and under the ongoing oversight by the issuing Court.

164. Plaintiffs provide reunification therapy, therapeutic intervention services, consultation, and expert testimony in high-conflict custody matters throughout the United States.

Plaintiffs professional practice depends substantially upon referrals and appointments from family law attorneys, courts, judges, mental health professionals, and prospective clients.

165. Prior to Defendants' publications, Plaintiffs had established professional reputations developed over approximately fifty-five years of practice and maintained ongoing business relationships that generated substantial annual income through court appointments, therapeutic services, consultations, and expert testimony.

166. Plaintiffs continued professional success depended upon maintaining reputations for ethical conduct, child safety, evidence-based treatment, and professional competence.

Harm to Plaintiffs

167. Following publication of Defendants' articles, Plaintiffs experienced substantial harm to their professional reputation and business relationships.

168. Attorneys ceased referring matters to Plaintiffs, courts declined to appoint Plaintiffs in new matters, existing professional opportunities were disrupted, and prospective clients failed to retain Plaintiffs after learning of the publications.

169. For example, in her ongoing cases, the ProPublica articles have served opposing lawyers' motions in limine to exclude Gottlieb's testimony and expert reports.

170. Gottlieb's office received calls from prospective clients and their lawyers expressing concern regarding the articles and failed to hire Gottlieb.

171. Gottlieb's subsequent income fell dramatically from income from years prior to the articles' publications, and Gottlieb's office received ongoing death threats, with the caller citing the articles.

172. Opposing counsel in custody proceedings began using Defendants' articles to challenge Plaintiffs' credibility, qualifications, and professional competence.

173. Plaintiffs' income and professional opportunities substantially declined following the publications.

174. Gottlieb's office also received numerous phone calls with physical and death threats and harassment referencing Defendants' publications, causing Plaintiffs to incur security-related expenses and alter their professional practices.

175. Despite repeated notice of the falsity of the statements and the harm being caused, Defendants refused to retract the articles, correct the false statements, or produce the alleged recordings for independent verification.

176. The articles remain publicly accessible and continue to cause ongoing reputational and economic harm to Plaintiffs.

CAUSES OF ACTION

AS AND FOR A FIRST CAUSE OF ACTION (Fraudulent Inducement)

177. Plaintiffs repeat and realleges each and every allegation contained in paragraphs "1" through "176" as though fully set forth herein.

178. Defendant Hannah Dreyfus knowingly made material misrepresentations of fact to Gottlieb during and in connection with her requests for interviews and communications with Gottlieb, including, but not limited to, the following representations:

- a. That the "introductory conversation" was solely intended to provide her with background information regarding Plaintiffs and the subject of parental alienation in general;
- b. That she had no intention of publishing Gottlieb's statements or quoting Gottlieb in any article;
- c. That she was merely attempting to gain a genuine understanding of parental alienation and was not actively preparing or rushing to publish an article concerning the subject;

- d. That she was not working on any current or imminent story involving a parental alienation case; and
- e. That she had interviewed several of Gottlieb's trusted colleagues for the purported purpose of understanding the scientific acceptance of parental alienation and to enable her to counter allegedly false claims regarding the subject in a future article to gain Gottlieb's trust; and
- f. That she herself has established programs in Texas and California due to court and attorney demand

179. The foregoing representations were false and known by Dreyfus to be false when made.

180. Upon information and belief, Dreyfus made the foregoing misrepresentations as part of a deliberate scheme to induce Gottlieb to participate in interviews and provide comments concerning the highly publicized Utah TikTok-related parental alienation matter that was the subject of the first article which Dreyfus was then actively preparing for imminent publication.

181. Dreyfus's true intent and purpose were revealed by, among other things, her subsequent February 15, 2023, communication seeking follow-up comments after Gottlieb declined further participation, as well as her later publication of the February 26, 2023, article.

182. Knowing that Gottlieb would rely of the false representations made by Dreyfus, Dreyfus made the foregoing misrepresentations with the intent to induce Gottlieb to do the interview that she had previously refused to do.

183. Gottlieb reasonably and justifiably relied upon Dreyfus's representations in agreeing to participate in discussions and communications with her.

184. But for Dreyfus's misrepresentations and fraudulent inducement, Gottlieb would not have participated in or granted the interview or provided any statements or commentary to Defendants.

185. As a direct and proximate result of Defendants' fraudulent conduct, Plaintiffs suffered substantial damages, including but not limited to:

- a. Damage to Plaintiffs' professional reputations;
- b. Loss of existing and prospective business opportunities and professional relationships;
- c. Threats to Gottlieb's personal safety requiring protective measures, including enrollment in an address confidentiality program;
- d. Emotional distress; and
- e. Other economic and non-economic damages in an amount to be determined at trial but believed to exceed \$500,000.

186. By reason of the foregoing, Plaintiffs are entitled to compensatory damages, punitive damages, costs, disbursements, interest, and such other and further relief as the Court deems just and proper.

**SECOND CAUSE OF ACTION
(Fraud – Fabrication and False Attribution of Statements)**

187. Plaintiffs repeat and reallege each and every allegation contained in paragraphs "1" through "186" as though fully set forth herein.

188. Defendants knowingly published and republished false and fabricated statements that were falsely attributed to Plaintiffs, as described herein, including, but not limited to:

- a. False statements attributing to Plaintiffs involvement in a specific custody matter with which Plaintiffs was not involved, to wit: The "TikTok Case"
- b. Fabricated quotations concerning protective orders and related proceedings, to wit:
- c. False representations that Gottlieb had discussed specific case facts and circumstances with Defendant, to wit: (as stated in #s 17-39) that Gottlieb wished to silence child to allege sexual abuse by a parent; that TPF is harmful to children; that Gottlieb fails to protect children from abusive parents; that Gottlieb supplants the authority of the court; etc.

189. The foregoing statements and purported quotations were materially false and were known by Defendants to be false at the time of publication.

190. Defendants' knowledge of the falsity of the published statements is evidenced by, among other things:

- a. Gottlieb never made the statements attributed to them;
- b. Plaintiffs were never involved in the Utah Case falsely attributed to him;
- c. Gottlieb expressly prohibited publication and declined participation beyond preliminary discussions;
- d. Defendants have failed and refused to produce any complete recording or contemporaneous evidence substantiating the purported quotations and statements attributed to Gottlieb; and
- e. Defendants have refused to permit or facilitate independent examination and analysis of the alleged recording and related materials.

191. Defendants published the fabricated statements intentionally and with the expectation and intent that third parties, including attorneys, judges, clients, professional colleagues, and members of the public, would rely upon and believe the false statements attributed to Gottlieb.

192. Upon information and belief, third parties did in fact rely upon the false publications, including by terminating, refusing to establish, or refusing to continue professional and business relationships with Plaintiffs.

193. As a direct and proximate result of Defendants' fraudulent fabrication and publication of false statements, Plaintiffs have suffered substantial economic, professional, and reputational damages in an amount believed to exceed \$400,000, together with continuing damages to be proven at trial.

194. By reason of the foregoing, Plaintiffs are entitled to compensatory damages, punitive damages, costs, disbursements, interest, and such other and further relief as the Court deems just and proper.

**THIRD CAUSE OF ACTION
(Fraudulent Concealment and Continuing Fraud)**

195. Plaintiffs repeat and reallege each and every allegation contained in paragraphs “1” through “194” as though fully set forth herein.

196. Following publication of the February 26, 2023, article (Article One), Defendants engaged in a continuing course of fraudulent conduct and concealment designed to perpetuate the falsehoods published about Plaintiffs, the knowingly false attributions to her TPF, intervention, and conceal evidence demonstrating their falsity.

197. Defendants’ continuing fraudulent conduct included, but was not limited to:

- a. Refusing repeated demands to produce the alleged Zoom recording or complete underlying source materials purportedly supporting the statements attributed to Gottlieb;
- b. Making inconsistent and evolving false representations concerning the contents and existence of the alleged recording and quotations attributed to Gottlieb;
- c. Refusing to permit independent forensic, voice, or authenticity analysis of the alleged recording and related materials;
- d. Refusing to retract or correct the fabricated statements despite notice of their falsity and repeated demands for correction;
- e. Continuing to publish, republish, hyperlink, endorse, and disseminate the false statements with knowledge of their falsity;
- f. Publishing additional articles on or about May 18, 2023, and May 26, 2023, that further amplified and republished the defamatory and fabricated statements concerning Plaintiffs; and
- g. Publishing additional articles and materials, including publications linking back to and endorsing the prior false publications concerning Plaintiffs.

198. Defendants' conduct demonstrates ongoing knowledge of the falsity of the statements attributed to Gottlieb, the knowingly false attributions to her TPF intervention deliberate concealment of material evidence, and an intent to continue and perpetuate the harm caused to Plaintiffs' reputation, professional standing, and business relationships.

199. Defendants' continuing fraudulent concealment prevented Plaintiffs from fully discovering the nature and extent of Defendants' misconduct and impeded Plaintiffs' ability to obtain evidence necessary to expose the fabrication and falsity of the published statements.

200. As a direct and proximate result of Defendants' fraudulent concealment, Plaintiffs have suffered substantial economic, professional, and reputational damages in an amount believed to exceed \$400,000, together with continuing damages to be proven at trial.

201. By reason of the foregoing, Plaintiffs are entitled to compensatory damages, punitive damages, costs, disbursements, interest, and such other and further relief as the Court deems just and proper.

**FOURTH CAUSE OF ACTION
(Tortious Interference with Existing Business Relations)**

202. Plaintiffs repeat and reallege each and every allegation contained in paragraphs "1" through "201" as if fully set forth herein.

203. At all relevant times, Plaintiffs maintained existing and ongoing business relationships with, among others:

- a. Family law attorneys who regularly referred clients and cases to Plaintiffs;
- b. Courts that appointed Plaintiffs in custody and reunification matters;
- c. Existing clients receiving therapeutic and consultation services from Plaintiffs; and

- d. Professional colleagues who regularly consulted with Plaintiffs and referred clients to them.

204. These business relationships were valid, ongoing, and economically beneficial, generating substantial annual revenue to Plaintiffs.

205. Defendants knew of Plaintiffs' existing business relationships and economic expectancy arising therefrom, including Plaintiffs' reliance on referrals, court appointments, and professional reputation in maintaining their practice.

206. Defendants intentionally interfered with Plaintiffs' existing business relationships by, among other things:

- a. Publishing false and defamatory statements concerning Plaintiffs' professional conduct and ethics;
- b. Falsely attributing to Plaintiffs a controversial custody matter with which Plaintiffs were not involved;
- c. Falsely stating that Alienation is rejected in the Scientific and Psychiatric Community and is considered "junk science";
- d. Fabricating statements falsely suggesting that Plaintiffs advocated removing children from protective parents and placing them with abusive parents;
- e. False Insinuation that TPFf accepted a case involving child Abuse when the Court found the allegations to be meritless;
- f. Falsely claiming that TPFf lacks judicial oversight and renders decisions that belong to the Court;
- g. Falsely claiming that TPFf is a secretive program operated by an unqualified provider;
- h. False Insinuation that TPFf and Plaintiff cause children to threaten suicide;
- i. False Insinuation that TPFf is an ineffective and harmful therapy;
- j. False Insinuation that Plaintiff sacrifices child safety for a program fee;

- k. Reiteration of the Falsity that the successful findings of the research study on the TPFIF Intervention was based upon Plaintiff's self-report;
- l. Refusing to retract or correct such statements after being informed of their falsity; and
- m. Continuing to republish and maintain the false statements despite knowing that such conduct was causing damage to Plaintiffs' professional relationships and practice.

207. Defendants employed wrongful means in interfering with Plaintiffs' business relationships, including, but not limited to:

- a. Fraudulent inducement;
- b. Fabrication and falsification of purported statements attributed to Gottlieb;
- c. False attribution of matters Plaintiffs never handled;
- d. Deliberate omission and suppression of material facts and scientific evidence;
- e. Continued publication of statements known to be false;
- f. Fraudulent concealment of relevant evidence, including refusal to produce recordings; and
- g. Defamation per se injurious to Plaintiffs in their profession and business.

208. The foregoing conduct constituted independently tortious and wrongful conduct separate and apart from the interference itself.

209. Defendants acted intentionally, maliciously, and with the purpose of disrupting Plaintiffs' existing business relationships and destroying Plaintiffs' professional standing and income.

210. As a direct and proximate result of Defendants' conduct, Plaintiffs' existing business relationships were terminated, diminished, or substantially impaired, including the loss of referrals, appointments, clients, and professional opportunities.

211. As a result of Defendants' tortious interference, Plaintiffs have sustained substantial damages, including but not limited to:

- a. Loss of income and business revenue;
- b. Loss of existing clients and referral sources;
- c. Loss of court appointments and professional opportunities;
- d. Damage to Plaintiffs' professional reputation and standing in the community;
- e. Loss of future business opportunities and earning capacity;
- f. Emotional distress; and
- g. Other consequential and pecuniary damages in an amount to be determined at trial.

**FIFTH CAUSE OF ACTION
(Tortious Interference with Prospective Business Relations)**

212. Plaintiffs repeat and realleges each and every allegation contained in paragraphs "1" through "211" as if fully set forth herein.

213. At all relevant times, Plaintiffs had reasonable expectations of entering into prospective business relationships with, among others:

- a. Prospective clients seeking reunification therapy and related services;
- b. Attorneys seeking expert consultation and testimony in pending and future matters;
- c. Courts considering Plaintiffs for future appointments in custody-related proceedings; and
- d. Professional organizations and colleagues seeking Plaintiffs' consultation and expertise.

214. Such prospective business relationships were reasonably certain to occur based upon Plaintiffs established professional reputation, specialized expertise, prior referral history, ongoing inquiries, and demonstrated history of professional engagement and income generation.

215. Defendants knew, or reasonably should have known, that Plaintiffs' professional practice depended upon maintaining her reputation and securing future referrals, appointments, and client engagements.

216. Defendants intentionally interfered with Plaintiffs' prospective business relationships by:

- a. Publishing false and defamatory statements attributed to Gottlieb;
- b. Portraying Plaintiffs as unethical, professionally unfit, and insensitive to the welfare of children;
- c. Creating the false impression that Plaintiffs endangered children and engaged in improper therapeutic practices;
- d. Refusing to retract or correct the false statements after notice of their falsity; and
- e. Continuing to publish and maintain such statements despite knowing they would impair Plaintiffs' ability to secure future professional opportunities.

217. Defendants accomplished such interference through wrongful means, including fraud, fabrication, defamation, fraudulent concealment, and other independently tortious conduct as alleged herein.

218. Defendants acted intentionally and with malice, knowing and intending that:

- a. Attorneys would cease referring matters to Plaintiffs;
- b. Courts would decline to appoint Plaintiffs in future cases;
- c. Potential clients would avoid seeking Plaintiffs' services; and

- d. Plaintiffs' future professional opportunities and earning capacity would be substantially impaired.

219. As a direct and proximate result of Defendants' conduct, Plaintiffs lost prospective business relationships, referrals, appointments, and professional opportunities that otherwise would have been realized.

220. Plaintiffs have suffered substantial damages as a result of Defendants' tortious interference with prospective business relations, including but not limited to:

- a. Loss of prospective income and business opportunities;
- b. Loss of future referrals and client engagements;
- c. Exclusion from consideration for professional appointments and engagements;
- d. Damage to Plaintiffs' reputation and standing within her professional community;
- e. Loss of future earning capacity; and
- f. Continuing economic and reputational harm.

221. The damages caused by Defendants' conduct are ongoing and continuing in nature.

**SIXTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)**

222. Plaintiffs repeat and reallege each and every allegation contained in paragraphs "1" through "221" as if fully set forth herein.

223. Defendants engaged in extreme and outrageous conduct that exceeded all bounds of decency tolerated in a civilized society, including, but not limited to:

- a. Fraudulently inducing Gottlieb's participation in an interview through material misrepresentations and deception;
- b. Fabricating statements and quotations falsely attributed to Gottlieb;

- c. Falsely associating Plaintiffs with a controversial custody matter in which Plaintiff were not involved;
- d. Publishing statements Gottlieb expressly prohibited from publication;
- e. Refusing to produce the alleged underlying recording despite repeated demands and opportunities to do so;
- f. Expanding and escalating the fabricated quotations after Gottlieb expressly denied their authenticity;
- g. Refusing to permit independent verification or voice analysis that would conclusively establish the falsity of the purported statements;
- h. Continuing to publish and republish false statements despite notice of their falsity and the resulting harm to Plaintiffs;
- i. Intentionally and recklessly impairing Plaintiffs' professional reputation and livelihood; and
- j. Continuing such conduct despite knowledge that Plaintiffs had been subjected to threats, harassment, and fear for her personal safety arising from the publications.

224. Defendants acted intentionally, maliciously, and/or with reckless disregard of the substantial probability that their conduct would cause Gottlieb severe emotional distress.

Defendants knew, or should have known, that their conduct would cause severe emotional distress because:

- a. Gottlieb's livelihood and professional standing depended upon her reputation as a mental health professional;
- b. The fabricated statements falsely portrayed Plaintiffs as advocating conduct harmful to children and families;
- c. Accusations of unethical or dangerous conduct against a mental health professional are uniquely and foreseeably damaging;
- d. The widespread publication of such false accusations would subject Plaintiffs to public ridicule, condemnation, and professional ostracism;

- e. Plaintiffs' work in high-conflict custody matters made threats and harassment a foreseeable consequence of the false publications; and
- f. Defendants continued their conduct despite knowledge that Plaintiffs had received threats and feared for their safety.

225. As a direct and proximate result of Defendants' extreme and outrageous conduct, Plaintiff Gottlieb suffered severe emotional distress, including, but not limited to:

- a. Severe anxiety, emotional anguish, and depression;
- b. Fear for her personal safety arising from threats and harassment caused by the publications;
- c. Humiliation, embarrassment, and loss of standing within her professional community;
- d. Emotional trauma arising from Defendants' deception and continued publication of knowingly false statements;
- e. Sleep disturbance, stress-related physical symptoms, and chronic emotional suffering;
- f. Hypervigilance and ongoing fear requiring security measures and participation in New York's Address Confidentiality Program;
- g. Loss of enjoyment of life and diminished professional fulfillment; and
- h. Isolation and withdrawal resulting from the stigma caused by Defendants' conduct.

226. Gottlieb's emotional distress has been severe, substantial, and continuing in nature, and was directly and proximately caused by Defendants' intentional and reckless conduct.

227. By reason of the foregoing, Gottlieb is entitled to recover compensatory and punitive damages in an amount to be determined at trial.

SEVENTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress - Alternative to Sixth Cause of Action)

228. Plaintiffs repeat and realleges each and every allegation contained in paragraphs “1” through “227” as if fully set forth herein.

229. Defendants owed Gottlieb a duty of reasonable care in their journalistic practices and business conduct, including:

- a. Duty to verify statements before attributing them to sources;
- b. Duty to honor representations made to induce source participation;
- c. Duty to refrain from publishing statements a source explicitly prohibited;
- d. Duty to produce evidence when the accuracy of attribution is challenged;
- e. Duty to retract false statements upon discovering their falsity;
- f. Duty to exercise reasonable care to avoid interfering with another's business relationships through false statements.

230. Defendants breached these duties through the conduct alleged above, including:

- a. Failure to verify fabricated statements before publication;
- b. Violation of representations made to induce Plaintiff's participation;
- c. Publication of statements Gottlieb explicitly prohibited;
- d. Refusal to produce alleged recording despite multiple demands;
- e. Refusal to retract false statements despite clear evidence of falsity;
- f. Escalating fabrications rather than correcting the record.
- g. Publication of several additional articles with fraudulent claims, quotes and falsities.

231. Defendants' breach of duty created an unreasonable risk of causing emotional distress to Gottlieb.

232. Severe emotional distress was a reasonably foreseeable consequence of

Defendants' conduct because:

- a. Publishing false accusations against a mental health professional foreseeably causes severe distress;
- b. Destroying someone's professional reputation and livelihood foreseeably causes severe distress;
- c. Subjecting someone to death threats through false publication foreseeably causes severe distress;
- d. Continuing to publish known falsehoods despite demands for retraction foreseeably prolongs and exacerbates distress.

233. As a direct and proximate result of Defendants' negligent conduct, Gottlieb has suffered severe emotional distress as alleged above.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment:

- (a) upon the First Cause of Action, in an amount to be determined but believed to exceed \$500,000.00
- (b) upon the Second Cause of Action, in an amount to be determined but believed to exceed \$400,000.00;
- (c) upon the Third Cause of Action Cause, in an amount to be determined along with equitable estoppel; and
- (d) upon the Fourth Cause of Action, in an amount to be determined; and
- (e) upon the Fifth Cause of Action, in an amount to be determined; and

- (f) upon the Sixth Cause of Action Counterclaim, in an amount to be determined plus punitive damages; and
- (g) upon the Seventh Cause of Action Counterclaim, in an amount to be determined
- (h) awarding costs and disbursements of this action; and
- (i) such further and other relief as the Court deems appropriate.

Dated: Jericho, New York
June 18, 2025



ROBERT HILTZIK
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380 N. Broadway
Penthouse West
Jericho, New York 11753
(516) 308-4674

VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) SS.:

LINDA GOTTLIEB, being duly sworn, deposes and says:

That I am the sole shareholder and president of LINDA GOTTLIEB, TURNING POINTS FOR FAMILIES, P. C., one of the Plaintiffs in the above-entitled action. I have read the foregoing Verified Complaint and know the contents thereof, the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

Linda Gottlieb
LINDA GOTTLIEB
President of Linda
Gottlieb, Turning Points
for Families, P.C.

Sworn to before me this
18th day of June, 2026

[Signature]
NOTARY PUBLIC

James A. Lattmann
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02LA6391082
Qualified in Nassau County
Commission Expires April 29, 2027

VERIFICATION

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:

LINDA GOTTLIEB, being duly sworn, deposes and says:

That I am one of the Plaintiffs in the above entitled action; I have read the foregoing Verified Complaint and know the contents thereof, the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

Linda Gottlieb
LINDA GOTTLIEB

Sworn to before me this
18th day of June, 2026

JA
NOTARY PUBLIC

James A. Lattmann
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02LA6391082
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**Index No.: 152397/2026
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

LINDA JOY GOTTLIEB, and LINDA GOTTLIEB, TURNING POINTS FOR FAMILIES, P.C.,

Plaintiffs,

-against-

**PRO PUBLICA, INC., HANNAH DREYFUS,
AND MICHAEL SQUIRES,**

Defendants.

**VERIFIED COMPLAINT
Signature Pursuant to
22 NYCRR 130-1.1a**



Robert Hiltzik

ROBERT HILTZIK, ESQ.

**380 N. Broadway
Penthouse West
Jericho, New York 11753
(516) 308-4674
Eagleactiv@aol.com**

To:

Attorney(s) for:

Service of a copy of the within

is hereby admitted,

Dated:

Attorney(s) for