



NATASHA LAKAEV

Plaintiff

BETWEEN: - and -

CARLI McCONKEY

Defendant

**AMENDED STATEMENT OF CLAIM PURSUANT TO AN ORDER OF HIS
HONOUR THE ASSOCIATE JUDGE DATED 9 EPTEMBER 2021**

1. The plaintiff:
 - (a) Is a Clinical Psychologist registered with Australian Health Practitioner Regulation Agency and is a full member of the Australian Psychological Society's College of Clinical Psychologists;
 - (b) Is and has at all material times practiced as a private Clinical Psychologist in Australia, in particular on the Gold Coast in Queensland, as well as at several locations in Northern New South Wales; and
 - (c) Is a Government contractor for the Access to Allied Psychological Services program with North Coast (New South Wales) Medicare Local and Gold Coast (Queensland) Medicare Local.
2. The defendant is a writer and author.
3. On or about 30 July 2017, the defendant authored and published a work entitled "The Cult Effect" ("**the Book**").
4. The Book is available for purchase by the general public, and remains available on several websites, including:
 - (a) www.angusrobertson.com.au;
 - (b) www.amazon.com.au;
 - (c) www.booktopia.com.au;
 - (d) www.bookdepository.com;
 - (e) www.foyles.co.uk;

Filed on behalf of the plaintiff

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- (f) www.kisslibray.com; and
- (g) www.thriftbooks.com.
5. The Book contains, in its main text, the following publications, of and concerning the plaintiff:
- (a) *“Group member would single people out and bring up issue with “weak” or “lazy” members, yelling and screaming at them, sometimes getting physical with them to try and Shift them (from being Stuck) so they would not fail to adhere to the rules again.”;*
- This type of behaviour was initiated and encouraged by Natasha who would scream and yell at students over an Issue regularly and set the example for all other group members to follow. A few times during the year, she hit and shoved people to make her point clear. We soon learned, if we hadn’t already, that she had a very domineering, aggressive and controlling personality.”;*
- (b) *“Once we have completed the major portion of our PMC assignments, Natasha told us, one night in a meeting, that she had something special in store for us. She explained that, due to us counselling people from all manner of society, we had to be prepared and empathetic with our clients. Therefore, we needed to experience taking drugs.”;*
- Natasha proceeded to ask one of her Support Team members to bring our marijuana joints which she said were from reputable sources nearby, whom they had bought from previously. She told those of the group who were predisposed to drug addiction that they could partake if they wanted to, as it was under a controlled environment where the Support Team would be in close vicinity. However, once we commenced smoking the joints, the Support Team joined in, as well as Natasha.”;*
- (c) *“No, Carli!” Natasha screamed. ‘Luke manipulated you to transfer those funds to pay his own debts! Don’t you know he’s a gambler and a thief? You are a fucking idiot, you stupid bitch. You do whatever you want to do, you c**nt.’;*
- I was then ‘In The Shit’, as we would come to call it whenever Natasha punished someone for an extended period of time. The only way you came out of The Shit was by climbing your way out of it – by working harder, smarter and beyond the call of duty. This would involve being screamed at daily, and punished with menial tasks like cleaning, whipper-snipping, or office admin, all hours of the day and night, making you feel degraded and worthless.”;*
- (d) *“Natasha would regularly verbally abuse me on the phone from Brisbane, or while she was down at Omaroo. Constantly she would scream at me, calling me a ‘liar’, a ‘selfish brat’, and a ‘fat, lazy dog.’ Invariably she would finish with the line, ‘you are a fucking c**nt.’;*

- (e) *“FRESH ZEN WHOLESale continued until it became evident that it was no longer financially viable. Natasha then worked on getting Luke institutionalised into a psychiatric facility in Brisbane. I visited Luke at the hospital one day with Natasha, bringing along paperwork that I have been asked to prepare. He looked drugged out and weak, not at all like the strong and vibrant Luke I had once admitted. Natasha asked Luke to sign over his Power of Attorney to her, and she commenced the process of pursuing an Income Protection claim on his behalf. This meant she could collect this money for herself.”;*
- (f) *“Madeline must have been an exceptional lawyer (keeping in mind she believed everything Natasha told her) as the court concluded that the claim was legitimate. Natasha was now collecting three income protection amounts, two in her name, and the other as Power of Attorney for Luke. With Luke safely in the care of the psychiatric hospital, Natasha got back together with Jeremy.”;*
- (g) *“Natasha told Michael to hit and slap me and tell me what a bad person and mother I was. ‘Mick, you need to whack some sense into Carli. She’s an absolute idiot. She has created all of this and you have let her. Take control of your “wife”, Mick. I can’t do it all for you!”;*
- (h) *“Whether Michael wanted to beat me or not, Natasha said that if he didn’t do what needed to be done, then the guys would knock some sense into him.”;*
- (i) *“Soon after the incident, Jeremy ran away again, before the contract had been completed. Sometime later Ted took Natasha to court to recover his equipment and recoup a percentage of the contracts they had secured, as he had a 50:50 share in the company and had virtually set up the whole business. Natasha told each of the PMC guys to sign legal documents stating that they had been paid \$7,500 each in wages (which they had not) so she could present to the court the argument that there was no money left over from the business for Ted to lay claim to. She also included \$20,000 worth of consultancy fees to herself.”;*
- (j) *“Natasha flew up to the course-room in a rage, wooden spoon in hand, followed by all the mothers. She found Sebastian, who was the oldest of the kids in the room at four years old, tucked in bed, and screamed at him: ‘What have you done?’*

Sebastian sat up in shock. ‘Nothing,’ he said.

She demanded an explanation of what had just happened. ‘Stand up! Did you take off the children’s nappies?’

He shook his head and trembled. ‘No’.

Did you smear this poo all over the floor?

He again whimpered ‘no’, his little body shaking.

Natasha started belting into him with the wooden spoon. When it broke, she yelled to Tiffany: 'Get another one from the Centre Kitchen!'

Tiffany raced off to the kitchen and came back with a metal spatula. Again, Natasha started smacking him. She then told Tiffany and Kate to start hitting him as well. After they'd both smacked him, Natasha turned to me and shouted: 'Carli, he's your child. You spank him! You have to teach him these lessons, not just us. Discipline now, otherwise he's going to be a monster when he grows up.'";

- (k) *"In a matter of minutes, with clearer thoughts, and way from the clutches of Natasha and her increasingly paranoid world, I began to realise that she was a cult leader, and I had been part of a cult.";*
- (l) *"We had been taught by Natasha to smack our children with wooden spoons".*
- (m) *"She is a criminal. She has physically assaulted people, psychologically abused people and conned people out of money!";*

("the Book Passages").

6. The Book also includes by way of annexures, the following publications of and concerning the plaintiff:

- (a) An article headed *"In thrall to a cult: how the unwary fall victim to mind control"* purportedly published by The Sydney Morning Herald newspaper on 17 October 2010 containing the following publications, of and concerning the Plaintiff:
 - (i) *"Carli McConkey is not mentally ill. Neither drugs nor alcohol has led her to this point. Instead, in 1996 she joined a New Age personal development group called Universal Knowledge, seeking clarity. Once McConkey converted to its aims, the group's leader, Natasha Lakaev, manipulated her, hit her, took hundreds of thousands of dollars from her, and worked her without pay for up to 22 hours a day, seven days a week.";*
 - (ii) *"These techniques appear to be for health reasons but they actually have the effect of debilitation," says Whitsett. "They reduce the person's ability to think critically, to reason, and when people are so weak the 'self' is impaired, they are easier to control and manipulate.";*
 - (iii) *"Whitsett says this "continuous barrage of attacks on the 'self' keeps the person in a continuous state of failure, of low self-esteem, and attached to the cult.";*
 - (iv) *"Once Lakaev's disciples were hooked, their critical faculties broken down and their outside support cut off, Lakaev revealed her more extreme theology. McConkey says she claimed to be a reincarnation of Jesus Christ, and one of the 12 members on the Intergalactic Council of the Universe. She came from the "Bird Tribes" from a different*

dimension and she remembered all her past lives. In one of them she had been Queen of Atlantis. McConkey was told by Lakaev she had been a "lady in waiting" in Atlantis and she felt she was put on earth to serve her.";

(v) *"In December 1999, McConkey began working for Lakaev in the office without wages, and also cleaning and maintaining her properties. She and Michael bought a share in Lakaev's company, Universal Knowledge, for \$20,000, believing they were buying equity, securing their future. They received nothing in return. Company documents show \$420,000 was raised from investors in this manner, and Lakaev admits none have seen a return."*;

(vi) *"McConkey and her husband had more than one period apart as they dealt with the psychological and financial pressures imposed by Lakaev. In the meantime, McConkey says she was psychologically abused and physically assaulted by Lakaev, and was separated from her sons because Lakaev convinced her she was a "human f--- up". Lakaev also once beat McConkey's young son with a wooden spoon, she says."*; and

(vii) *"Finally, in January this year, McConkey could handle no more. She picked up her children and drove away into what she believed was certain death at doomsday. "I was exhausted, had been beaten up again and was unable to cope with any more psychological and emotional pressure. I just said to myself, 'I don't care if I die in two years' time, I would prefer to be free and enjoy my children'." and*

(b) An article headed "Alleged leader of cult works as psychologist" purportedly published by The Sunday Age newspaper on 17 October 2010 containing the following publications, of and concerning the Plaintiff:

(i) *"A woman accused of leading a cult that has damaged the lives of scores of people is working as a psychologist with vulnerable patients at a community mental health service in Queensland."*;

(ii) *"Natasha Lakaev's Universal Knowledge organisation was offering courses until last year that prophesied the world would end in December 2012 and almost everyone except her devotees would die."*; and

(iii) *"A former member of her inner circle, Carli McConkey, has told The Sunday Age that Ms Lakaev was physically violent and psychologically manipulative, and had persuaded her followers that she was the Queen of Atlantis, a reincarnation of Jesus Christ, and one of 12 members of the Intergalactic Council of the Universe."*;

("the Article Passages").

7. The Book Passages and the Article Passages are defamatory of the plaintiff and bore and were understood to bear, in their natural and ordinary meaning that:

- (a) In respect of those referred to at paragraph 5(a), (c) and (d) that the Plaintiff was a bully and had bullied the Defendant;
- (b) In respect of those referred to at paragraphs 5(a), (l) and 6(a)(i), (vi), (vii) and (b)(iii), that the Plaintiff had unlawfully battered the Defendant;
- (c) In respect of those referred to at paragraph 5(o) that the Plaintiff had unlawfully battered other persons;
- (d) In respect of those referred to at paragraph 5(g) and (h) that the Plaintiff had unlawfully incited other persons to batter persons;
- (e) In respect of those referred to at paragraphs 5(e), (f) and (i) and 6(a)(i) and (iv) that the Plaintiff had unlawfully obtained a financial advantage;
- (f) In respect of those referred to at paragraph 5(b), that the Plaintiff had unlawfully used illicit drugs and had encouraged others to do so;
- (g) In respect of those referred to at paragraphs 5(k) and 6(a)(i), (ii), (iii), (iv), (vi) and (vii) and (b)(i), (ii) and (iii), that the Plaintiff had wrongfully indoctrinated people;
- (h) In respect of those at paragraph 6(a)(i) and (iv) that the Plaintiff had breached Australian industrial legislation;
- (i) In respect of those at paragraph 5(m), that the Plaintiff was a criminal.

7A. The defendant has also published and continues to publish the following further materials of and concerning the Plaintiff via the website <https://www.carlimcconkey.com>

- (a) *"I lost over 13 years in the destructive cult, Universal Knowledge (formerly known as Life Integration Programmes), run by cult leader Natasha Lakaev (a registered Psychologist with AHPRA, Australia)"*
- (b) *"Myself and scores of others were abused by Natasha Lakaev, who used mind control to yield power, money and glorification within a high demand group. Cult leaders generally display the traits of a charismatic narcissist, with Antisocial, Borderline and Histrionic Personality Disorders"*
- (c) A discussion of the Book as: *"a gripping account of the brutal impact of spiritual and violent extremism."*
- (d) *"What at first appeared professional and promising, became a vehicle for psychological and physical abuse."*

7B. The defendant has also published and continues to publish the following further materials of and concerning the plaintiff via the section of her website entitled "Book Reviews" which is viewable at the URL: <https://www.carlimcconkey.com/book-reviews:>

(a) *"I was involved with Lakaev's courses close to two decades ago and was absolutely shocked to learn that this woman went from operating her cult to becoming a registered psychologist in Australia (current) and at some stage was even working for Queensland Health as a government-employed psychologist. Unfathomable and this was despite several media exposes on her, an obviously questionable online presence and several complaints to the Queensland Psychology Board and the Australian Health Practitioner Regulation Agency (AHPRA). This book reveals it all, providing not only in-depth, clear and explanatory description of how this Australian cult operated but in the final chapters also provides insights into how AHPRA and the Queensland Psychology Board allowed Lakaev to continue with her registration as a psychologist despite what has been presented in front of them."*

(b) *"Carli McConkey has shared her journey into a New age cult with honesty and courage. This book will be invaluable in helping others who have been, or find themselves drawn into what appears to be a group offering courses to benefit their lives, often at a vulnerable time in their life. Trapped for 13 years in a world of abuse and control Carli bravely tells her story of life in Universal Knowledge and her journey to freedom."*

7C. The defendant has also published and continues to publish of and concerning the plaintiff via the section of her website titled "My Story" at the URL: <https://www.carlimcconkey.com/news:>

(a) An article headed *"Alleged leader of cult works as a psychologist"* purportedly published by The Sunday Age and the Sydney Morning Herald on their websites on 16 October 2010 containing the following publications of and concerning the plaintiff:

(i) *"Carli McConkey, has told The Sunday Age that Ms Lakaev was physically violent and psychologically manipulative, and had persuaded her followers that she was the Queen of Atlantis, a reincarnation of Jesus Christ, and one of 12 members of the Intergalactic Council of the Universe."*

(ii) *"Complaints against her by former acolytes have been investigated once by Queensland's health regulator, but*

no action taken. The national health regulator will not comment except to say Ms Lakaev “has current registration and is therefore deemed fit to practise”.

(b) An article headed *“Medium, Carli’s Story: Exiting a Cult”* purportedly published by the Let’s Talk About Sects podcast on 30 January 2018 containing the following publications of and concerning the plaintiff:

- (i) *“On top of the financial strain, things also often got physical. “When this cult leader was bashing me up, I was feeling like I deserved this.”*
- (ii) *“My cult leader now as a registered psychologist, threatened that if I did leave, that she would report me to DOCS, Department of Child Safety, and have my children taken away from me ’cos she was going to say that I was an abusive mother and sign off on it as a psychologist.”*

7D. The defendant has published and continues to publish the following material of and concerning the plaintiff via her Twitter account at the url: https://twitter.com/carli_mcconkey?lang=en

- (a) *“Please join me in demanding that the Australian Health Practitioner Agency (AHPRA) and the health Care Complaints Commission (HCCC) de-register a Clinical Psychologist who is an abusive Cult Leader.”*

7E. The Defendant has published the following material concerning the Plaintiff via her Facebook account which is viewable at the url: <https://www.facebook.com/carlimcconkey>

- (a) *“Please support this petition to ask the Australian Health Practitioner Registration Agency (AHPRA) and the Health Care Complaints Commission (HCCC) to re-investigate a Clinical Psychologist who has caused significant harm to vulnerable members of the Australian community.”*
- (b) *“This psychologist “was the President of the Australian Psychological Society from 2009 to 2011” at the time when my cult leader, Natasha Lakaev was investigated as a registered Psychologist for allegations of abuse and physical assault. No wonder these criminals get away with their crimes when all levels of government and those in power do nothing and let the perpetrators continue to cause further harm to society. Natasha Lakaev is still a registered psychologist.”*

7F. The publications the defendant has made of and concerning the plaintiff as pleaded at paragraphs 7A, 7B, 7C, 7D and 7E hereof are defamatory of the plaintiff and bore and were understood to bear, in their natural and ordinary meaning that:

- (a) In respect of those referred to at paragraph 7A(a), 7B(a), 7C(a)(ii), 7D(a) and 7E(a) that the plaintiff is unfit to practise as a psychologist;
- (b) In respect of those referred to at paragraph 7A(b), 7A(d) and 7B(b) that the plaintiff committed acts of abuse against the defendant;
- (c) In respect of those referred to at 7A(d), 7C(a)(i), 7B(b)(i) and 7E(b) that the plaintiff physically abused the defendant;
- (d) In respect of those referred to at 7A(b) that the plaintiff is likely to suffer from narcissistic personality disorder and borderline personality disorder;
- (e) In respect of those referred to at 7A(c) that the plaintiff is a violent extremist;
- (f) In respect of those referred to at 7C(b)(ii) that the plaintiff misused her position as a psychologist to threaten her; and
- (g) In respect of those referred to at 7E(b) that the plaintiff was guilty of abuse and physical assault of the defendant and that she was guilty of such conduct as to warrant her de-registration as a psychologist.

8. By reason of the publication of the Book containing Book Passages and the Article Passages, **and by reason of the publications pleaded at paragraphs 7A, 7B, 7C, 7D and 7E hereof** the plaintiff has been greatly injured in her personal and professional reputation and by reason of those publications persons are likely to be induced to shun, avoid, ridicule or despise the plaintiff.

9. **AND** the plaintiff claims:

- (a) Damages;
- (b) Costs;
- (c) An Injunction to restrain the defendant by herself or her servants or agents or otherwise howsoever from publishing or allowing to be published the assertions made of an concerning the plaintiff in the Book; and

- (d) An Injunction to restrain the defendant from further selling the Book, or allowing agents, servants, or other services or business selling the Book and from continuing to publish the matter pleaded at paragraphs 7A, 7B, 7C, 7D and 7E hereof.

Dated this 9th day of September 2021.

Butler McIntyre & Butler

Per: 

Solicitors for the plaintiff