UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng)
ZHANG Cuiping, WEI Min, LO Kitsuen, CAO Lijun)
HU Yang, GUO Xiaofang, GAO Jinying, CUI Lina,)
XU Ting, BIAN Hexiang) Civil Action No. 15 CV 1046
)
Plaintiffs,)
)
vs.)
)
Chinese Anti-Cult World Alliance, Michael CHU,)
LI Huahong, WAN Hongjuan, ZHU Zirou, and)
DOES 1-5 Inclusive)
)
Defendants.)

DEFENDANT'S REPLY TO PLAINTIFFS' OPPOSITION
TO MOTION TO DISMISS BY
DEFENDANTS CHINESE ANTI-CULT WORLD ALLIANCE,
MICHAEL CHU, LI HUAHONG, WAN HONGJUAN, AND ZHU ZIROU

Served: August 5, 2015

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Defendants Chinese Anti-Cult World Alliance Inc. ("CACWA"), Michael Chu, Huahong Li, Hongjuan Wan, and Zirou Zhu submit this reply to the Plaintiffs' Opposition to Defendants' Motion to Dismiss and respectfully request that the Court dismiss the Plaintiffs' Third, Fourth, and Fifth Causes of Actions pursuant to (i) Federal Rules of Civil Procedure 12(b)(6) on the ground that they fail to state causes of action on which relief may be granted, and (ii) to dismiss the Third, Fourth, and Fifth Causes of Actions contained in the Plaintiffs' Complaint, on the ground that Defendants' alleged wrongful conducts predating May 3, 2012 are time-barred.

FACTS

Defendants rely on the facts as more fully set forth in the previous pleadings.

ARGUMENTS

Plaintiffs' claims rest on wholly unsubstantiated and exaggerated insinuations that Defendants are proxies or pawns under the direction of the People's Republic of China, where the Falun Gong is deemed to be a cult. Plaintiffs make vague attempts to link CACWA and another organization, the Chinese Anti-Cult Association ("CACA"), without providing any support of such commitment or partnership, which in any event is denied by the Defendants. (Opp. p.17-18). Furthermore, Plaintiffs failed to show that CACWA or any of its agents work for or in connection with the Chinese Communist Party in order to rid the world of Falun Gong. The allegations stated in the Plaintiffs' complaints are merely bald accusations attempting to mislead the Court. In this, Defendants note Plaintiffs' hyperbolic comparison of Defendants' alleged activities to the Nazis or Khmer Rouge. (Opp. p. 4.)

Defendants aver that this is simply a local dispute between two parties who passionately disagree with each other and that Plaintiffs' claims of some grand conspiracy supported by a foreign government to subvert their civil rights is a fiction. The scale and persistence of Falun Gong's activities in Flushing, New York, as well as their comparatively deep pockets, undermine their claim that Defendants are capable of intimidation and suppression. Defendants believe that Plaintiffs, through this lawsuit, seek to suppress Defendants' constitutional right to express their disagreement with Plaintiffs' ideology and

practices, by pretending to be the victim.

I. PLAINTIFFS FAIL TO STATE A CLAIM UNDER THE DEPRIVATION CLAUSE OF 42 U.S.C. § 1985(3)

First and foremost, Defendants note that Plaintiffs state in their Letter Motion dated May 7, 2015, that Plaintiffs do not allege a deprivation of their First Amendment Rights, and therefore abandon any claim in this respect. Rather, Plaintiffs' allegations are solely that Defendants are preventing Plaintiffs from distributing Falun Gong materials on foot around certain streets located in Flushing, New York, as well as somehow preventing the authorities of Queens County and the State of New York from giving and securing Plaintiffs' ability to engage in Falun Gong related activities.

Plaintiffs allege that these actions show a conspiracy under 42 U.S.C. § 1985(3) to violate Plaintiffs' civil rights as well as to prevent Queens County and New York State authorities from providing the Plaintiffs with full, free and equal access to public spaces, and that Defendants are infringing Plaintiffs' Fourteenth Amendment rights by depriving them of their right to "intrastate travel", which they define as being "free and equal access to Main, Roosevelt, and other public streets in Queens County and the State of New York" and to travel 'by foot' on these streets to participate in parades" and distribute their materials. (Compl. p.38-40, Pre-Motion Conference Letter Response p.2) Plaintiffs' claims in this respect are unmeritorious for the reasons to follow.

A. <u>No state action, and interference with right to travel is only incidental to Defendants' objective</u>

Whether or not there is even a constitutional right to "intrastate travel" is unclear, with different Circuit Courts taking different approaches. *See* Mode, Gregory J. "Comment: Wisconsin, A Constitutional Right to Intrastate Travel, and Anti-Cruising Ordinances." *Marquette Law Review.* 78:735 (Spring 1995). In any event, the United States Supreme Court in *Carpenters v. Scott*, 463 U.S. 825 (1983), refused section 1985(3) protection for deprivation of Fourteenth Amendment rights without a requisite showing of state action.

Despite this, Plaintiffs argue that the right to intrastate travel does not require state action, and therefore, a claim as such does not require demonstration of any involvement by a state actor. Pre-Motion Conference Letter Response p.2.

In this, Plaintiffs seek to rely on the Second Circuit's decision in *Spencer v. Casavilla*, 839 F. Supp. 1014 (S.D.N.Y 1993). However, the Second Circuit in *Spencer v Casavilla* specifically cites the Supreme Court decision in *Bray v. Alexandria Women's Health Clinic*, 506 U.S. 263 (1993), where the Court required that the impairment of the right to travel in a § 1985(3) claim must be a conscious objective of the enterprise, and not merely incidental to it. Like the Defendants in *Bray*, the alleged interference with the right of travel is irrelevant to Defendants in this case, and merely incidental to their ultimate aim of speaking out against Falun Gong.

B. <u>Insufficient Proof of Conspiracy</u>

For Plaintiffs to adequately state a claim under 42 U.S.C. § 1985(3), they must show: 1) a conspiracy; 2) to deprive the plaintiffs of equal protection or equal privileges and immunities; 3) an act in furtherance of the conspiracy; and 4) an injury or deprivation resulting therefrom. *Griffin v. Breckenridge*, 403 U.S. 88 (1971).

The Plaintiffs seek to extrapolate from various websites and materials that Defendants are part of a conspiracy to deliberately violate their civil rights, even when the websites make no mention of Defendants as individuals or as an organization. Plaintiffs also seek to infer or insinuate a conspiracy from various alleged acts of Defendants, as they have no real evidence. This is insufficient at law.

The Supreme Court held in *Ashcroft v. Iqbal*, 129 S. Ct. 1937, 1949 (2009), that Plaintiffs are required to "plead and prove that the defendant acted with discriminatory purpose." In addition, "purposeful discrimination requires more than 'intent as volition or intent as awareness of consequences.'" *Aschroft v. Iqbal*, 129, S. Ct. at 1948, *citing Personnel Administrator of Mass. v. Feeney*, 442 U.S. 256, 279 (1979). To state a claim, Plaintiffs must plead substantial factual matters to show that Defendants specifically acted for "the purpose of discriminating on account of race, religion, or national origin."

(*Ashcroft v. Iqbal*, 556 U.S. 662 (2009) at p.11-13.)

Defendants here have only acted on their goals to educate and inform the public of the dangerous practices of Falun Gong, such as telling people not to take medicine, denying the existence of diseases and believing in an alien invasion. To extrapolate some form of conspiracy from Defendants' advocacy is misleading and false.

Furthermore, as per *Iqbal*, Plaintiffs have not pleaded factual matters to show that Defendants *specifically* acted for "the purpose of discriminating on account of race, religion, or national origin." Race and national origin do not apply in this case, and Defendants cannot be said to specifically act for the purpose of discrimination on the basis of religion when the Defendants deny Falun Gong as a religion in the first place.

C. Intracorporate Conspiracy doctrine applies

Further, the Supreme Court has held that as a matter of law, a parent corporation is incapable of conspiring with its subsidiary or agents. *Copperweld Corp. v. Independence Tube Corp* ,104 S. Ct. 2731 (1984). In this case, as the individual Defendants are part of a single entity (i.e. CACWA), the conspiracy fails because "[u]nder the intracorporate conspiracy doctrine, officers, agents and employees of a single corporate entity are legally incapable of conspiring together." *Hartline v. Gallo*, 546 F.3d 95, 99n.3 (2d Cir. 2008). A majority of the courts have also applied the Intracorporate Conspiracy doctrine to § 1985(3) civil rights claims. Smith, Douglas G., The Intracorporate Conspiracy Doctrine and 42 U.S.C. 1985(3): The Original Intent. *Northwestern University Law Review*, Vol. 90, No. 3, p. 1125 at 1184, 1996.

Accordingly, there are no factual allegations of the following essential elements in a 42 U.S.C. § 1985(3) claim:

(1) Plaintiffs do not plead state action, and do not deny there is none;

(2) Defendants' alleged infringement of Plaintiffs' (questionable) constitutional right of intrastate travel is only incidental to Defendants' objective of arguing that Falun Gong is a cult;

(3) Plaintiffs cannot extrapolate the existence of a conspiracy specifically to deprive them of their civil rights merely through actions Defendants have taken in exercising their own First Amendment rights to expose the Falun Gong as a cult.

For the foregoing reasons at law, Plaintiffs' Third and Fourth Causes of Action fails to satisfy the requirements of 42 U.S.C. § 1985(3) and should be dismissed.

II. PLAINTIFFS FAIL TO STATE A CLAIM UNDER THE HINDRANCE CLAUSE OF 42 U.S.C. § 1985(3).

As shown above, Plaintiffs provide no suggestion or evidence of any State involvement. Plaintiffs, however, are asking the Court to infer that there is a conspiracy to influence the State from Plaintiffs' outrageous allegation that Defendants have made "direct efforts to influence local police authorities." (Opp. p.19) The basis Plaintiffs give for their allegation is that "despite the increasing frequency of acts of violence and intimidation committed in the months preceding the filing of Plaintiffs' Complaint, the police have not been able to control the violence, intimidation, and other criminal conduct to date..." Compl. ¶¶ 127-131.

There is simply no proof to support this allegation. It is indisputable that Falun Gong practitioners continue to maintain multiple distribution points on the streets of Flushing on a daily basis with the express permission of the 109th police precinct (as raised in both Plaintiffs' Complaint and Opposition); a daily newspaper, The Epoch Times, that is available in 35 countries and 11 languages; a television station, New Tang Dynasty TV; the radio station Sound of Hope; and the funding of an annual multi-million dollar theatrical extravaganza at Lincoln Center (as well as "dozens of cities across the world", according to Foreign Policy magazine. http://foreignpolicy.com/2015/04/29/shen-yun-china-falun-gong-anti-chinese-communist-party-propaganda/).

By contrast, CACWA is a very small, Flushing-based operation, that maintains only one table. In fact, during the 2015 Flushing Lunar New Year Parade, the large Falun Gong contingent proved they

were not in the least bit intimidated by the presence of CACWA. Contrary to Plaintiffs' cries of deprivation and restriction, Falun Gong's mouthpiece newspaper, the Epoch Times, reported that it was CACWA's single float that was nearly stopped. http://www.theepochtimes.com/n3/1258703-waning-hate-campaign-stains-chinese-new-year-celebration-in-new-york/. Accordingly, the assertions that Defendants, somehow, are capable of stifling Falun Gong practitioners to any substantive degree within the United States, or that Plaintiffs are suffering disproportionate discrimination in the United States, are disingenuous.

Also, the link Plaintiffs are seeking to make between Defendants' advocacy against Falun Gong in their materials (to which they have provided a misleading interpretations), and their somehow being able to procure the State's support of a campaign against Plaintiffs in farcical contravention of entrenched American Constitutional precedent is extremely tenuous, misleading, and ultimately false. Plaintiffs also continue to insinuate, without proof, that Defendants are proxies or pawns of, or otherwise conspiring with the People's Republic of China to eliminate Falun Gong. Defendants aver that they believe the Falun Gong to be a cult that misleads people, but they adamantly deny the insinuation that they are under the direction of a foreign government, which is both unfounded in fact as well as defamatory.

Plaintiffs have not cited any evidence in their Complaint beyond mere innuendo and desperate attempts to extrapolate such a connection based on exaggerated interpretations of Defendants' actions. It is beyond doubt that Plaintiffs cannot prove any facts in support of this contention that would entitle them to relief. There is further no reasonable expectation that discovery would yield evidence of such absurd collusion. *See, Conley v. Gibson*, 355 U.S. 41 (1957); *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007); *Ashcroft v. Iqbal*, 556 U.S. 662 (2009).

For the foregoing reasons, Plaintiffs have failed to state a claim under the Hindrance Clause of 42 U.S.C. § 1985(3) and therefore the Fourth Cause of Action must be dismissed.

III. PLAINTIFFS FAIL TO STATE A CLAIM UNDER 18 U.S.C. § 248

Plaintiffs allege that Defendants have interfered with their religious freedom by using force and

threats to prevent Plaintiffs from distributing their materials and practicing their beliefs at their "Spiritual Center at Main Street near 41st Avenue" and the tables they man at various spots in Flushing. In so doing, they falsely argue that both the self-labeled "Spiritual Center" and their various tables constitute religious sites. (Opp. p.21-22)

Plaintiffs assert strenuously that Falun Gong is a religious organization even though their Founder Li Hongzhi has stated that the Falun Gong is merely a "self-cultivating exercise", and does not worship a deity.[1] (Motion to Dismiss p.14-15, citing the U.S. Department of State's 2000 Human Rights Country Report on China). In a New York Times interview with Li Hongzhi dated August 8, 1999, he is asked if Falun Gong is a religion, and if it requires faith. Mr. Li replies:

> "It is a practice that can remove illnesses, keep people fit and make one live longer. Like tai chi, it's a morning exercise. People practicing Falun Gong are expected to follow the principles of truthfulness, compassion and forbearance. And they must speak truthfully, have compassion, be benevolent, be tolerant. But whether people have other faiths or not, they can all practice Falun Gong. We do not get involved in faiths. We respect all of them."

Plaintiffs persistently rely on Immigration Court rulings in an attempt to persuade the Court into believing that Falun Gong is accepted as a religion. For example, Plaintiffs cite the Seventh Circuit decision in *Iao v Gonzales*, 400 F.3d 530 (7th Cir. 2005), which states that Falun Gong "is often referred to as a "religion" … Like other Asian "religions," such as Buddhism and Confucianism - on both of which Falun Gong draws - there is no deity." In fact, the full quotation in *Iao v. Gonzales* is as follows:

> "Falun Gong is an international movement, though primarily Chinese, that is often referred to as a "religion" (or, by its critics, as a "cult"), though it is not a religion in the Western sense. Like other Asian "religions," such as Buddhism and Confucianism-on both of which Falun Gong draws-there is no deity. The emphasis is on spiritual self-perfection through prescribed physical exercises; in this respect the movement has affinities with traditional Chinese medicine."

The Court goes on to say that "Anyone, we suppose, can get hold of a book of Li Hongzhi's teachings,

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[1] It must be noted that the Plaintiffs Opposition to the Defendant's Motion to Dismiss argues that the Founder Li Hongzhi's seminal work on Falun Gong "has no place in a motion to dismiss[,]" but then inserts the affidavit of an unknown witness whose affidavit contradicts that of the Founder's teachings. (Opp. p. 12)

start doing the exercises, and truthfully declare himself or herself a bona fide adherent to Falun Gong," and "Falun Gong, remember, is not theistic; nor is it hierarchical. So far as appears, what is central is neither doctrine nor symbol, but the exercises." In this, the Court cites the work of Benoit Vermander, "Looking at China Through the Mirror of Falun Gong," 35 China Perspectives 4 (May-June 2001), which states "the absence of any formal rituals and organization would make it impossible to consider Falun Gong precisely as a religion."

Plaintiffs' deliberate omission of key phrases in the very Court's decision they seek to cite is revealing of their weak claim to being a religion. It would appear that Falun Gong is more akin to, say, Hatha Yoga, which draws on Hindu precepts, but cannot be said to be a branch of Hinduism. http://www.wrs.vcu.edu/profiles/FalunGong.htm

Plaintiffs' sole rationale for claiming to be a religion, aside from the accompanying benefits of being classified as such, is to avail themselves of remedies and penalties under 18 U.S. Code § 248 (2) and (3) which prohibit people from interfering with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship.

Further, Plaintiffs seek to avail themselves to the protections of the Freedom of Access to Clinic Entrances ("FACE") Act, 108 Stat. 694. Contrary to the Plaintiffs assertions, it is abundantly clear that Plaintiffs do not fall within the class and situations contemplated by the FACE Act, which is designed to deal with the right of women to receive reproductive healthcare services and those who object to it because of their religious beliefs. For Plaintiffs to claim the Falun Gong's operations at 40-46 Main Street (the alleged "Spiritual Center", where their signboard reads the "Global Center for Quitting the Chinese Communist Party"), and their various tables are "religious sites" for the purposes of the FACE Act exceeds the bounds of believability.

In any event, it is abundantly clear from the continued scale of Falun Gong's activities throughout Flushing and the world that Defendants' alleged actions have had no appreciable impact whatsoever.

Accordingly, Plaintiffs' allegations that Defendants are somehow restricting their "religious" practices are unfounded and their Sixth Cause of Action should be dismissed.

IV. PLAINTIFFS' CLAIMS ARE TIME-BARRED

Defendants note Plaintiffs' admission that the claims of Li Xiurong, Cao Lijun and Bian Hexiang relate to incidents occurring prior to March 3, 2012. (Opp. p.24) In any event, Defendants deny there is any pattern of wrongdoing originating and continuing from the alleged acts to give credence to Plaintiffs' claims of circumventing the statute of limitations. The Defendants' alleged actions cannot constitute a continuous tort and in any case, the limitations period in civil conspiracy cases runs from each overt act causing damage, *Wells v. Rockefeller*, 728 F.2d 209, 216-17 (3rd Cir. 1984), while the Supreme Court has ruled that civil rights claims are "best characterized as personal injury actions" and the state statute of limitations should be applied. *Wilson v. Garcia*, 471 U.S. 266-280

V. MISLEADING TRANSLATIONS OF CHINESE TERMS DO NOT ESTABLISH "INVIDUOUSLY DISCRIMINATORY ANIMUS"

Plaintiffs have alleged that by using terms such as *xie jiao* ("evil cult"), PK ("battle or defeat"), *dou zheng* ("violent suppression") in their materials, Defendants have demonstrated "invidiously discriminatory animus" for the purposes of § 1985(3), rather than a "respectful theological or political disagreement." (Opp. p.15).

Quite apart from the fact that the use of even disagreeable language is protected by the First Amendment, (*United States v. Eichman*, 496 U.S. 310, 318 (1990) (even "virulent ethnic and religious epithets" are protected speech), Plaintiffs have purposely used hyperbolic translations of Chinese terms, meant to mislead the Court. According to the authoritative Chinese-English Dictionary compiled by the Beijing Foreign Language Institute (1979, Commercial Press), 斗争"dou zheng" is variously defined as:

1. "struggle, fight, combat"
2. "accuse and denounce at a meeting"
3. "strive for, fight for"

Clearly, this is very far from "violent suppression." Also, from a simple Google search, the modern

Chinese slang term "PK" is clearly much more benign than the Plaintiffs suggest. "PK" is either short for "Penalty Kick", meaning a one-on-one scoring competition in a soccer match to determine the winner (the term became popular after the 2002 Korea/Japan World Cup), or "Player Kill", a term used in online computer games meaning "to thoroughly dominate" or "to beat" in competition.[2]

It is clear from the above that Plaintiffs have chosen to exaggerate the extent and intent of Defendants' language. With a clearer understanding of the Chinese terms, it becomes apparent that the phrases used by Defendants show no racial or discriminatory animus. As such, the Plaintiffs' Third and Fourth Causes of Action must be dismissed.

CONCLUSION

Except as hereinbefore or in any document expressly admitted or not-admitted, each and every allegation in the Complaint or the Plaintiffs' subsequent pleadings are denied as if set out herein seriatim. For the reasons set forth above, Defendants respectfully request that the Court grant their motion to dismiss the Plaintiffs' Third, Fourth and Fifth Causes of Action with prejudice.

Dated: Forest Hills, New York

August 5, 2015

Respectfully submitted

LAW OFFICE OF EDMOND W. WONG

By: /s/ Edmond W. Wong

Edmond W. Wong (EW 3267)

[2] The Court is directed to Forumusa.com, http://languagelog.ldc.upenn.edu/nll/?p=4505, and urbandictionary.com for a fuller explanation of the term "PK." As this term is slang, there are no official translations from dictionaries, encyclopedias or other like sources. As such, translation is procured from the afore-mentioned sites to show the benign nature of the term, contrary to the Plaintiffs' misleading translations.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 5th day of August, 2015, served electronically via email a true copy of the within and foregoing DEFENDANT'S REPLY TO PLAINTIFFS' OPPOSITION TO MOTION TO DISMISS BY DEFENDANTS CHINESE ANTI-CULT WORLD ALLIANCE, MICHAEL CHU, LI HUAHONG, WAN HONGJUAN, AND ZHU ZIROU and depositing a true copy of the same, enclosed in a post-paid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Post Office within the state of New York, directed to the following address::

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