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September 2, 2004

KATHERINE J. TRAGER

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BY FEDERAL EXPRESS

Ms. Katherine J. Trager  
Senior Vice President, Secretary  
General Counsel  
Random House  
1745 Broadway  
New York, New York 10019

Mr. Dan Brown  
c/o Michael Rudell, Esq.  
Franklin, Weinrib, Rudell & Vassallo, P.C.  
488 Madison Avenue  
8<sup>th</sup> Floor  
New York, New York 10022

Re: The Da Vinci Code

Gentlepersons:

We represent Lewis Perdue, the author of the books *Daughter of God* and *The Da Vinci Legacy*. We are writing concerning the book, *The Da Vinci Code*, by Dan Brown, which infringes Mr. Perdue's copyrights in and to *Daughter of God* and *The Da Vinci Legacy*. We know that you are aware of Mr. Perdue's claim as he put Random House on notice of his claims on May 28, 2003, to which Ms. Trager responded on June 16, 2003.

We have reviewed and analyzed the works at issue, researched the applicable legal standards and case law, and evaluated the factual and legal arguments set forth in Ms. Trager's June 16, 2003 letter. Based on the foregoing, we have concluded that Mr. Perdue has substantial claims against Random House and Mr. Brown for copyright infringement.

In addition, Mr. Perdue has retained John Olsson, the Director of the Forensic Linguistic Institute. Mr. Olsson is a world-renowned professor and forensic linguist who, among other things, regularly works with law enforcement agencies in the prosecution of criminal plagiarism actions in the United States and abroad. A copy of Mr. Olsson's curriculum vitae is enclosed herewith. Mr. Olsson has conducted his own analysis of the works at issue, and, as set forth in the enclosed report, has concluded unequivocally that *The Da Vinci Code* infringes our client's copyrights in and to *Daughter of God* and *The Da Vinci Legacy*. As cataloged and detailed in Mr. Olsson's report, there are numerous striking and substantial similarities between the works of Mr. Brown and Mr. Perdue, including similarities between the plot structures, the heroes, the heroines, the villains and other expressive elements of the works at issue. These similarities are specific matters that one would not ordinarily expect to find in thriller novels, and could only be the result of copying.

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### The Evolution of Mr. Perdue's Works

*The Da Vinci Legacy* was originally published in 1983. To date, it has sold approximately 302,000 copies. *The Da Vinci Legacy* is a thriller novel exploring the relationship between Leonardo da Vinci, his art, and religion. It represents Mr. Perdue's initial venture into this topic. Mr. Perdue went on to further develop this concept in an subsequent book, *The Linz Testament*, published in 1985 (155,000 copies sold), wherein he added the theme of the lost feminine in modern day religion and the religious authorities desire to conceal the existence of a female messiah.

Mr. Perdue subsequently reworked *The Linz Testament* in what became *Daughter of God*. *Daughter of God* was published in 2000 (270,000 copies sold). In *Daughter of God*, Mr. Perdue, among other things, retained the main elements from *The Linz Testament*, eliminated certain characters and subplots, expanded and incorporated additional elements into the plot lines that he had developed over the years, and expanded other areas of the story, including further development of the female heroine.

### The Similarities Between *The Da Vinci Legacy* ("DVL") and *The Da Vinci Code* ("DVC")

As detailed in the enclosed report, the plot lines in these two books are virtually identical. Both of these books involve quests by similar heroes and heroines to obtain secret documents (i.e. the grail documents in DVC, and the missing Da Vinci Codex pages in DVL). In both novels, the public exposure of the secret documents threaten to shake the very foundation of Christianity and the Catholic Church. The authors' words describing this issue are eerily similar. For example, in *The Da Vinci Legacy*, Mr. Perdue explains that revealing the secret contained in the documents would "shake the foundations of the Catholic Church." (DoG at p. 226). In *The Da Vinci Code*, Mr. Brown similarly describes these documents as containing "a secret so powerful that, if revealed, it threatened to devastate the very foundation of Christianity." (DVC at p. 239).

The quests in both books begin with identical events: the killing of a world-renowned Da Vinci art expert. The expert is the fourth of his type killed. Before he dies, the expert leaves a last message written in his own blood on his own body. Not coincidentally, these events appear on page 35 in both books. The art experts in both books are the same ages (late 70's) with similar physical characteristics (fit and spry for men of their ages). The messages they leave in their own blood are religious puzzles intended for the heroine. These puzzles send the hero and heroine off on a trail that leads to a wood painting.

When the hero and heroine need assistance during their journey, they turn to an Ivy League, snobbish and wealthy "shapeshifter" who joins the quest. Because of his hatred of the Catholic church, the "shapeshifter" goes on to manipulate the hero, the heroine, and the head of a key religious brotherhood.

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In both books, a police subordinate is poised to capture the hero and heroine, but hesitates because he fears that his boss will be angry at him if he does not wait for the boss before making the arrest. As a result, the hero and heroine escape. The journeys of the hero and heroine in the two books eventually take them to a round church, a rarity in Christian architecture. When the hero and heroine cannot figure out how to proceed, they turn to a computer database operator for assistance. The books conclude without the documents being recovered and the determination by the heroes and heroines that the physical objects themselves are not that important. Rather, mystery and faith turn out to be most important.

In addition, to the specific plot and sequence of events detailed above, *The Da Vinci Code* contains additional expressive elements from *The Da Vinci Legacy*. For example, as detailed by Mr. Olsson, the heroes in the works are virtually identical. Both are Leonardo Da Vinci scholars who are in high demand as conference speakers. They share common physical characteristics. Both have blue eyes and strong jaws, and are in good physical condition but are described as looking older because recent events have taken their toll on them. Both heroes are haunted by lost loves at the beginning of the novels, but find new loves by the end. As set forth in the enclosed report, additional obvious similarities exist between the heroines, villains and secret brotherhoods in the two works.

Most telling is that Mr. Brown repeated a mistake that Mr. Perdue made that has never appeared in any other work. In both novels, Leonardo Da Vinci's Codex Leicester is mistakenly described as "parchment," rather than, as it really exists, on linen paper. Of course, such common errors are considered "the strongest evidence of copying" often "creating at least a prima facie case of copying." See Nimmer on Copyright § 13.03[C], at 13-77 (and cases cited therein).

#### *The Similarities Between Daughter of God ("DaG") and The Da Vinci Code ("DVC")*

There are also overwhelming similarities between *Daughter of God* and *The Da Vinci Code*. Both books are about the search by identical heroes and heroines for extraordinary documents that prove the existence of the identical sacred feminine who had been wronged by the Church and who is a symbol for the Great Goddess. The documents in both works are described as being so explosive that their revelation would devastate the "foundation" of the Church.

Both books begin with the murder of an art expert. The experts are both dying when first mentioned in the books and share common characteristics. They are approximately the same age and leave messages that lead the heroes and heroines to a painting that conceals a golden key. The paintings both contain the word "Lady" in the titles in reference to the books' female objects of worship.

The "keys" in the two books are not traditional keys. Rather, they are mysterious devices that provide access to safe deposit boxes at Zurich banks. Inside the safe deposit boxes are additional containers that require combinations to open them.

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Both books involve similar secret brotherhoods that are searching for the documents in order to consolidate their power over the Vatican and conceal the truth about the female Messiah. In both books the hero and heroine are stalked by similar "hulking" assassins and are assisted by well-educated shapeshifters who join the quest. The shapeshifters manipulate the heroes and heroines and ultimately acquire the prize from them.

As detailed in Mr. Olssen's report, additional expressive similarities exist between the two works. Again, the heroes and heroines are virtually identical. The villains are motivated by the same goals: to become the most powerful men in Christianity and return the Church to its true conservative ways.

#### The Cumulative Similarities between Mr. Perdue's Works and *The Da Vinci Code*

In addition to separately infringing *The Da Vinci Legacy* and *Daughter of God*, Mr. Brown has infringed the works when considered collectively. In other words, as demonstrated in the enclosed report, Mr. Brown has taken substantial amounts from each of Mr. Perdue's works, which considered together overwhelmingly evidence substantial infringement of Mr. Perdue's copyrights.

As one example, *The Da Vinci Code* and Mr. Perdue's works share the following identical plots, pacing, tone and sequence of events:

1. A slain curator of art leaves a gold key,
2. concealed in a work of art,
3. painted on wood.
4. That work of art is named for the divine feminine at the center of the book.
5. The gold key is not a traditional key that opens a tumbler.
6. The key is left (with no instruction) for the book's heroine
7. who is, herself, a symbol of and related to the divine feminine.
8. The gold key allows access (but does not turn a lock) to a safe deposit box in a Zurich bank.
9. The safe deposit box holds yet another container which has a combination that must be set.
10. The contents of the container holds additional clues to finding the object of their search that send the hero and heroine to a foreign country.

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11. The object of their search is a set of bones and documents relating to the divine feminine at the heart of the book.

Similarly, the hero in *The Da Vinci Code* is an obvious combination of the heroes in Mr. Perdue's two works. They have common occupations (professors/scholars), expertise (Constantine, Da Vinci and divine feminine), physical attributes (strong jaws, blue eyes, good physical shape), and emotional states (emotional void due to the loss of a loved one). The heroes also suffer from the same mild claustrophobia.

Whether viewed independently or cumulatively, the similarities between *The Da Vinci Code* and Mr. Perdue's books are too striking and numerous to be coincidental. They demonstrate that Mr. Brown infringed Mr. Perdue's copyrights in *The Da Vinci Legacy* and *Daughter of God*. See, e.g., *Castle Rock Entertainment, Inc. v. Carol Publishing Group, Inc.*, 150 F.3d 132 (2d Cir. 1998); *Twin Peaks Prods., Inc. v. Publications Int'l Ltd.*, 996 F.2d 1366 (2d Cir. 1993); *Wainwright Secs. Inc. v. Wall St. Transcript Corp.*, 558 F. 2d 91 (2d Cir. 1977); *Craft v. Kobler*, 667 F. Supp. 120 (S.D.N.Y. 1987).

#### Responses to the Points in Ms. Trager's Previous Letter

We have considered the factual and legal arguments in Ms. Trager's June 16, 2003 letter. For the reasons set forth below, we disagree with those arguments.

We are mindful that Mr. Brown claims that he never heard of Mr. Perdue or his works. However, the prior widespread publication of Mr. Perdue's works, which were available in Exeter where Mr. Brown lives (indeed, we know that the Public Library in Exeter has a hardcover copy of *Daughter of God*), the extensive research that Mr. Brown admits he conducted before writing *The Da Vinci Code*, the numerous striking and substantial similarities between Mr. Brown's and Mr. Perdue's works including identical plot lines, characters and other elements, and the fact that Mr. Brown's and Mr. Perdue's works contain the identical factual error concerning the Codex Leicester refute Mr. Brown's contention. These facts not only demonstrate that Mr. Brown had access to Mr. Perdue's works, but also establish that he borrowed heavily from them. Indeed, Mr. Olsson's analysis confirms the public rumors that have been circulating ever since the release of *The Da Vinci Code* - - that he copied from Mr. Perdue's books.

We have reviewed the case of *Walker v. Time Life Films, Inc.*, 784 F.2d 44 (2d Cir. 1986), cited in Ms. Trager's letter. We are confident that that the result here would be different and that, unlike in *Walker*, a court would find that the works at issue here are substantially similar. First, *Walker* involved a claim that the movie "Fort Apache: The Bronx" infringed the copyright in plaintiff's book "Fort Apache" not a comparison of literary works like here. Moreover, in *Walker*, plaintiff's book was admittedly a non-fictional account of actual events, which the court noted "renders proof of infringement more difficult." *Id.* at 49. The books at issue here are fiction thriller novels, not merely accounts of actual events. Furthermore, Mr. Olsson has identified numerous, specific similarities between the sequence of events, characters,

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dialogue, mood, setting, pace and theme of Messrs. Perdue and Brown's works, not the vague general similarities identified by the plaintiff in Walker. The similarities identified in Mr. Olsson's report are more than sufficient to defeat a motion for summary judgment and allow a jury to determine the substantial similarity issue. See, e.g., Shaw v. Lindheim, 919 F.2d 1353 (9<sup>th</sup> Cir. 1990) (reversing summary judgment in favor of defendant where based upon a review of expert analyses of common themes, plots, sequences of events, characters and dialogue in the scripts at issue "[a] reasonable trier of fact could find that the similarity between [the works] is not so general as to be beyond the protections of copyright law.")

We also disagree with the suggestion that the similarities between the works consist of only unprotectable ideas, *scenes a faire* and historical facts. Indeed, Mr. Olsson's extensive analysis does not include any such items. Furthermore, the fact that a work contains certain unprotectable elements does not prevent it from being infringed. The particular sequence in which an author strings a significant number of unprotectable elements is itself protectable. For example, in Shaw, the plaintiff submitted a list of 26 similarly striking plot elements events in the two scripts that the court noted exaggerated certain similarities and relied heavily on *scenes a faire*. The Shaw court nonetheless concluded that the plots and sequences of events contained enough similarities to preclude summary judgment in favor of defendants:

Even if none of these plot elements is remarkably unusual in and of itself, the fact that both scripts contain all of these similar events gives rise to a triable question of substantial similarity of protected expression.... "Where plot is ... properly defined as 'the sequence of events' by the author expresses his 'theme' or 'idea' it constitutes a pattern which is sufficiently concrete so as to warrant a finding of substantial similarity if it is common to both plaintiff's and defendant's works." Nimmer on Copyright § 13.03[A], at 13-31 (quoting Shipman v. RKO Radio Pictures, Inc., 100 F.2d 533, 537 (2d Cir. 1938)).

Id. at 1363. See also Metcalf v. Bochco, 294 F.3d 1069, 1074 (9<sup>th</sup> Cir. 2002) (reversing summary judgment for defendant because of "the presence of so many generic similarities and common patterns" between the plots in the works). Of course, Mr. Olsson's report identifies concrete similarities in the plot elements of the books, as well as virtually identical expressions of those elements by Messrs. Perdue and Brown. Mr. Olsson concluded, as we do, that the protectable expression of Mr. Perdue's works was copied, separate and apart from historical facts or ideas that may be common to both authors' works.

### Conclusion

Based upon the foregoing, we believe that Mr. Perdue has an extremely strong case for copyright infringement. There is the "smoking gun" of the repeated factual mistake. Mr. Olsson's report identifies over 300 significant similarities between the works, including over 50

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pivotal plot events, sixty-five percent (65%) of which appear in the same order, a showing far more than what was present in Shaw. Even if some of the expressive elements might be considered scenes a faire, the number of similarities and the order in which they appear are protectable as explained by the Court in Metcalf. These similarities (including the repeated mistake) combined with the widespread circulation of Mr. Perdue's works and Mr. Brown's admission that he conducted extensive research before writing *The Da Vinci Code*, at a minimum, raise triable issues of fact sufficient to overcome any attempt to avoid having this matter determined by a jury.

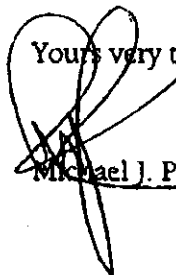
Before we commence an action for copyright infringement, we would like to provide Random House and Mr. Brown with an opportunity to try to resolve the matter. We know that, to date, Mr. Perdue has made public statements about his claims. Now that Mr. Perdue has retained us, we have instructed him to refrain from commenting about his claims in order to allow us to address the matter on his behalf.

If Random House and/or Mr. Brown are interested in attempting to resolve this matter amicably, please contact me or my partner, Yakub Hazzard. If we do not here from you by September 13, 2004, we will assume that Random House and Mr. Brown are not interested in discussing settlement and we will proceed accordingly.

We look forward to your response.

This letter is not intended to constitute a full statement of all facts, rights, or claims relating to this matter, nor is it intended to be, nor should it be, construed as a waiver, release or relinquishment of any rights or remedies available to our client, whether legal or equitable, all of which are hereby expressly reserved.

Yours very truly,

  
Michael J. Plonsker

MJP/ams  
Enclosures

cc: Mr. Lewis Perdue  
Yakub Hazzard, Esq.





**John Gabriel Olsson**  
**Curriculum Vitae**

**Qualifications:**

Master of Arts in Linguistics (University of Wales)

Master of Philosophy in English (University of Birmingham)

Member, since 1994, of the International Association of Forensic Linguists

Author of Forensic Linguistics textbook: *"An Introduction to Language, Crime and the Law"*  
Continuum Books, March 2004, details at: [http://www.continuumbooks.com/author\\_details.cgi?aid=4669&ssid=KHQC39ODM5CPAA8HDO2A40](http://www.continuumbooks.com/author_details.cgi?aid=4669&ssid=KHQC39ODM5CPAA8HDO2A40)

Adjunct Professor, Masters of Forensic Science, Nebraska Wesleyan University, Lincoln, Nebraska  
(distance learning instructor in forensic linguistics) (ref: Prof Jody Meerdink, Psychology Dept).

Have submitted reports to the FBI, House of Commons (UK Parliament), Foreign Affairs Committee,  
Hutton Inquiry.

Since 1995/6 have operated a website on forensic linguistics ([www.thetext.co.uk](http://www.thetext.co.uk)). Now the number one  
on the Google and Yahoo search engines. Have handled more than 80 authorship and plagiarism cases in  
this time.

**Recent Cases:**

Currently reporting to the Criminal Cases Review Commission, a pre-appeal court body which  
determines whether cases have sufficient material to present to the House of Lords, in re HM Regina v  
Gurnail Singh Basra, Case No. 87/0411.

Recently reported to plaintiffs in an industrial tribunal case in Northern Ireland (Case No: 00289/00FET,  
01274/00 and following). A six-figure settlement was achieved which was due, in part, to the authorship  
attribution undertaken in this case by me.

Have advised a police force in the US on statement analysis in connection with sexual assault  
complaints and authorship in suicide texts.

Have worked with a number of universities in the UK and the US in connection with plagiarism cases  
(University of Iowa Medical school and the University of Surrey, School of Management).

Have written a report for the San Francisco Chronicle on plagiarism (ref: Adair Lara).

**Read an article about John Olsson, the author of this report,**  
**and his determination of plagiarism by author Richard Condon in *The***  
***Manohurlan Candidate.***  
**John Olsson's Curriculum Vitae**

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**A forensic account of the striking infringements of protectible material by Daniel Brown in his *Da Vinci Code* of Lewis Perdue's *Daughter of God* (and related works)**

**Please note: Page numbers below and in other spreadsheet comparisons refer to the:**

- Hardcover version of *Da Vinci Code*.
- Softcover version of *Da Vinci Legacy* (1983 edition which was the only edition available when the analysis was conducted, not the 2004 re-issue).
- Softcover of *Daughter of God*.

**Publishing Note:**

The reader will be aware that the controversy to be addressed in this document is not only about Dan Brown's *The Da Vinci Code* (hereafter DVC) with respect to Lewis Perdue's *Daughter of God* (hereafter DoG), but also between Brown's book, DVC, and Perdue's two earlier books, *The Linz Testament* (hereafter Linz) and *The Da Vinci Legacy* (hereafter DVL).

The first of these, DVL, was published in 1983, followed by Linz in 1985, with DoG published in 2000. Essentially, each novel has built on its predecessor. In DVL Perdue began by exploring the topic of Leonardo da Vinci and religion in a thriller format, but later felt that to this theme should be added that of exploring the notion of 'the lost feminine' in modern day religions — having concluded that DVL had not succeeded in quite the way he wanted (though the book itself was very successful). So, in writing Linz, the second book of this genre, he kept some character types, almost began the narrative from scratch, and then expanded the religious history aspect which was what had begun to engage his interest at that time. Also, he was on the lookout for a different kind of heroine: in DVL the heroine is rescued by the hero, but by the time we get to Linz the heroine is the one doing the rescuing. This plot line goes a step further in DoG, because here the heroine rescues herself. There are many other refinements, to do with the characterisation overall, and the plot lines themselves. It is also true to say that in his researches — now spanning over 20 years — Perdue has accumulated a not inconsiderable knowledge of certain aspects of religion and art. Interestingly, as he would be the first to admit, he has also probably acquired some quite erroneous impressions and/or facts. Curiously, one of these errors (there may be others) was repeated by Brown in DVC, the kind of material error of fact that probably could have only one source, namely Perdue's books themselves. Moreover, as shall be seen later in this analysis, the error is quite central to the story, since it relates to a significant feature of the narrative of Perdue's books, and later Brown's.

Therefore, it is important to realize that — despite the existence of many points of striking similarity between the later and earlier books by Perdue — the later books are not mere reworkings of the earlier ones, but major developments, not only in terms of characterisation and plot but also in terms of the underlying infrastructure of facts and knowledge, although there are of necessity many points of striking similarity between the later and earlier books.

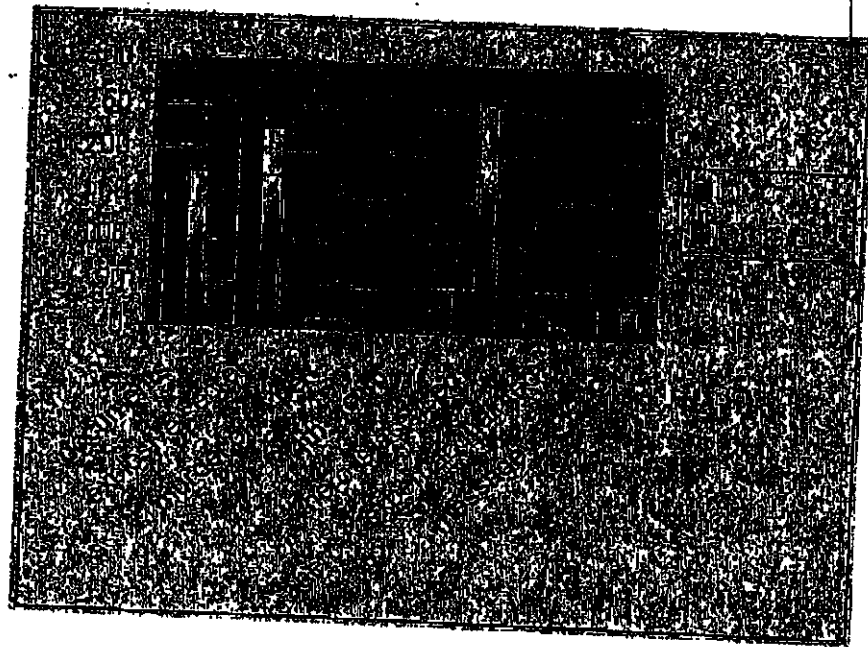
### **Aim of the present analysis**

As outlined in the previous section, the claim is not just that Brown plagiarized from DoG, but also from DVL and Linz. That is the purpose of this analysis: to demonstrate substantial infringement by Daniel Brown of Lewis Perdue's three books DVL (*Da Vinci Legacy*), Linz (*The Linz Testament*) and DoG (*Daughter of God*). The reader will appreciate that of necessity it would be impossible in this document to catalogue each and every alleged plagiary. Rather, the intention is to give the reader a general introduction to the nature and extent of these infringements.

### **Overall structure of the two books: powerful evidence of similarity**

Several plot lines run through Perdue's original *Daughter of God*/*Da Vinci Legacy* books, and many of these are strikingly similar or even identical in Brown's later *Da Vinci Code*. One set of examples concerns the way in which the hero becomes involved in the quest to locate the documents which contain secrets so dangerous and 'explosive' that members of various religious sects are prepared to kill to conceal them.

The documents, in each author's work, contain explosive secrets, and a quest to find them is launched when a renowned international expert is murdered by a member of a religious sect. Co-incidentally (?) in each book the expert is the 4<sup>th</sup> person within his area of expertise to be killed in this way (not the 2<sup>nd</sup>, 3<sup>rd</sup> or 5<sup>th</sup>, but in each case, the 4<sup>th</sup>). As it happens the hero and the expert in each author's work are actually acquainted with each other. The murdered expert in each author's work writes a last message in his own blood, and — finally — the hero, in each author's work, is accused of the murder of the expert. More details are shown in the graph below, where each bar relates to the page number in the respective book where the relevant detail is mentioned. As the reader will observe, there are seven plot features — which I believe to be representative of the striking similarities across the books in general — mentioned in the description above, and shown in the graph below — six of these seven plot features are in sequence and on very similar page numbers within the overall books.



**Graph 1: Showing identical key plot features across DVC and DoG/DVL with 6 out of 7 features in sequence (only moment when hero is accused is out of sequence). [Please note that this correlation of similarities has been extended to more than 50 events which occur in both Brown's and Perdue's works and that 65% of these appear in the same order and in nearly the very same position in the books.]**

So, for example the existence of the secret documents is first aired on Page 158 in DVC, and Page 175 in DoG/DVL. The 'explosive' secret these documents contain is first aired on Page 239 in DVC and Page 226 in DoG. The expert — whose murder launches the quest to find the documents is murdered on Page 11 in DVC and 15 in DoG. The fact that the hero and expert are acquainted is mentioned on Page 22 and Page 15 respectively. And the fact that the dying expert wrote a message in his own blood, is mentioned — in both books — exactly on Page 35. The only difference as far as sequence in the above plot line is concerned, relates to when the hero is accused of having murdered the expert. In DVC it happens early, Page 47, while in DoG it happens later, on Page 260: but the point is, it happens in *both* books. So we have 7 identical plot features out of 7 across both Brown and Perdue, of which 6 are in sequence. But, to put the above in context: this is only a small part of the striking similarity of plot, characterisation, and expression of narrative across the two authors. Two further, striking, examples of this degree and depth of similarity can be found if we study the characteristics of the hero and the heroine across the two authors.

### **The hero: Incontestable similarities**

In this section I will show that infringement has incontestably taken place in the following areas:

- Striking biographical similarities between the Brown and Perdue heroes:

- including looks, age, personal anxieties and difficulties
- Their remarkable career and intellectual interest parallels
- The outstanding parity between their personal lives as the respective books open
- How their personal relationships evolve in practically identical ways with respect to the heroine

In each book we have a hero and a heroine. There is, of course, nothing unusual about this, except that there are very close parallels between the hero of Brown's book (DVC) and Perdue's book (DoG), as there are between the heroines. The heroes are of the same age group, and follow identical occupations in that they are both professors in religious subject areas at very prominent universities (comparative religion [DoG] vs religious 'symbolology' [DVC]), and whereas Perdue's DoG hero is an expert in the Roman Emperor Constantine and female divinity with Perdue's other book the *Da Vinci Legacy*'s hero as a Leonardo scholar, Brown's hero is not only a Leonardo scholar but also an expert in the Roman Emperor Constantine and female divinity. Thus we have a 100% match between Brown and Perdue with respect to occupation and areas of expertise (which even in real life would be stretching co-incidence as frequently academics within the same discipline will have slightly different areas of speciality and not a perfect match, as in this instance).

In addition, both are showing signs of ageing as the novels open, read ancient Greek, are 'captivating' on the 'podium' (Brown) or have a smile which 'captivates' at the 'podium' (Perdue), are haunted by lost loves — in Perdue the hero has a "hollow void in his chest", whereas Brown has "an unexpected emptiness in his chest".

By the end of the book each hero gains (or regains) the love of the book's heroine. The hero of DVC shares a further interesting characteristic with that of DoG: both have claustrophobia, or to be precise 'mild claustrophobia'. As mentioned above, in each of the books the hero is falsely accused of murder, against the background of each needing to fulfil the quest of the narrative, which is to locate documents relating to a female deity, either through the Holy Grail documents, or the Da Vinci Codex, or the shroud of this female deity. In carrying out this quest the hero has a further motivation, which is to protect the heroine.

The checklists below summarise the impressive range of equivalences between Brown's and Perdue's heroes. List 1 consists of plot-centric striking similarities, while List 2 consists of further similarities.

**List 1: Powerful, plot-centric similarities between Brown and Perdue heroes**

Characteristics	Detail	Brown	Perdue
AGE GROUP	Late 30's to early 40's	✓	✓
OCCUPATION	Professor of Religion	✓	✓

INTERESTS: (1)	CONSTANTINE	✓	✓
INTERESTS: (2)	FEMALE DIVINITY	✓	✓
INTERESTS: (3)	LEONARDO SPECIALIST	✓	✓

✓ Indicates identical, or near identical feature across both authors

**List 2: Other striking similarities between Brown and Perdue heroes**

Characteristics	Detail	Brown	Perdue
PHYSICAL CONDITION	Signs of ageing	✓	✓
CURRENT ROMANTIC ATTACHMENT	Between relationships	✓	✓
PHOBIA	Mild claustrophobia	✓	✓
ROMANTIC DENOUEMENT	(Re)gains love of book heroine	✓	✓

As the reader will observe, the above lists demonstrate unambiguously the identical parallels between the two writer's heroes. The heroes of the two writers share six plot-centric characteristics out of six, and there are four out of four parallels across the above set of less crucial, but still important, personal characteristics and outcomes between the two authors' principal male characters.

**The heroine: breathtakingly alike across both authors**

In this section I will outline:

- The extraordinary array of similarities between the Brown and Perdue heroines with regard to looks and age, including hair colouring (auburn or burgundy), eye colour (green) and the fact that the heroines do not conform to typical modern fiction stereotypes (e.g. 'slim', 'blonde', etc.)
- Their uncannily similar childhoods (raised by male figure after family tragedy) as well as educational, career and academic interest parallels: educated in two languages and two countries, work for law enforcement agencies, interests in religion and art; both characters are resourceful and plucky, have a strong interest in and skill with cryptology/forgery, etc.
- Almost identical name associations with figures from religion, female deities,

### and Gnostic Gospels

Like the two heroes, the heroines of the two authors have many striking similarities and many identical points. In DoG Zoe's hair colour is not specified, but her predecessor in *The Linz Testament* had auburn hair: in DVC Sophie Neveu's hair is 'burgundy'. Sophie, like Zoe's predecessor has 'flashing green' eyes. Both women are either 'ample' of figure, or 'robust': they are not the typical slim heroines found in many books and films. All the heroines are in the same age group, late 20's to early 30's. Just as with the heroes we have in the heroines, characters of very closely matching characteristics.

In DoG we have Zoe Ridgeway who is an art broker whose expertise includes forgery detection and whose major interest is religion, whereas in DVC we have Sophie Neveu, a Paris police officer part of whose job is cryptography and she, like Zoe, has a major interest in religion and, also like Zoe, expertise in art. It should be noted that Perdue's earlier book DVL has the art journalist Suzanne Storm, who in fact is an undercover CIA agent. So, the main characteristics of Brown's heroine with regard to occupation and areas of specialised interest are identical to those of both of Perdue's heroines, with particularly suspect areas of co-incidence being their work for law enforcement agencies, an expertise in art and an interest in religion. More detailed information is available [here](#).

**List 3: Plot-centric striking similarities between Brown and Perdue heroines**

Characteristics	Brown	Perdue
AGE GROUP: Late 20's to early 30's	✓	✓
LAW ENFORCEMENT LINK	Paris police officer/Cryptography	Forgery detection/undercover CIA
ART EXPERTISE	Specialised interest	Art broker
RELIGIOUS INTEREST	✓	✓
RESOURCEFULNESS	Saves hero's life: involves simulating him jumping out of high window	Saves hero's life: involves him jumping off high building

**List 4: Further striking similarities between Brown and Perdue heroines**

Characteristics	Detail	Brown	Perdue

PHYSICAL TYPE	Not slim	✓	✓
Hair	Not blonde	burgundy	auburn
Eyes	Green	'green eyes flashing'	'green eyes flashing'
Childhood	Raised by father figure because of family problems/tragedy	Raised by artistic grandfather	Raised by artistic father

The origin of Perdue's Zoe Ridgeway is given by Perdue in DoG as the goddess Sophia of the Gnostic Gospels. In fact, the actual daughter of the Sophia of the Gnostic Gospels was called Zoe. Therefore, Perdue's heroine is symbolically the daughter of Sophia.

Brown's heroine is called Sophie Neveu who is said to be a descendant of Mary Magdalene, the alleged wife of Jesus Christ. Mary Magdalene, in the Gnostic Gospels (also the source for much of Brown's research) is actually a stand-in for the Sophia of the Gnostic Gospels, according to well-known writer Margaret Starbird (whom Brown admits to having consulted): "In long-standing tradition, it was she [Mary the Magdalene], understood by early Gnostics as an incarnation of Sophia, ...." (*Magdalene's Lost Legacy*, p. 125, Starbird). In other words, Brown's heroine is the lineal (rather than symbolic) daughter of Sophia.

In both Perdue's and Brown's books, the goddess Sophia has been wronged by the church authorities who have deprived the goddess of her rightful position as an official deity in the church. The quest is to obtain access to the 'explosive' (both authors) documents which prove the link between Christ and the female goddess in each case, and thus demonstrate the inviolable position of the female deity in the church, and re-assert the 'sacred feminine' as the core of religion.

#### List 5: Source material for female characters

Characteristics	Detail	Brown	Perdue
Zoe	Originally daughter of Sophia of the Gnostic Gospels		Perdue's heroine is symbolic daughter of Sophia
Sophie	Alleged descendant of Mary Magdalene: Starbird has Mary Magdalene as stand-in for Sophia of the Gnostic Gospels	Brown's heroine is lineal daughter of Sophia	



Church authorities	Female Goddess wronged, deprived of rightful position as official deity	✓	✓	
Documents	'Explosive' documents would rock church by exposing 'truth'	✓	✓	

The ways in which these documents are hidden, the people who protect them, and the ways in which they come to light, are remarkably similar across both books. These striking parallels will be explored in greater depth in subsequent analyses.

### The smoking gun: a potent error across both authors

While the plot sequence is certainly a smoking gun there is, in this analyst's view, one even more powerful smoking gun, which is a document known as the Codex Leicester, an actual book written by the Renaissance scientist and artist, Leonardo da Vinci. The codex Leicester is written on linen paper, but Perdue erroneously records this as 'parchment' in his book — an error which extensive researches (across the Internet, as well as other sources) do not uncover as occurring elsewhere. In his book Brown repeats this error. There is, to my knowledge, no other mention of the Codex Leicester being on 'parchment' anywhere else other than in these two authors' books. Therefore, it does not seem feasible that Brown could have got this particular misinformation anywhere else than from Perdue.

### The location of the golden key and the quest for the secret documents

In this section I will show the striking encroachment of certain protected elements by Mr Brown of Mr Perdue's book with regard to a multiplicity of very close parallels between the two authors with regard to crucial plot lines. Here is a preview:

- The fact that in both authors the main quest is for a set of secret documents
- Exposure of this set of documents would cause to be given up age-old ecclesiastical secrets about the rôle, status and lineage of the female deity in formal religion and bring down the Church, or seriously damage its prestige. Both sets of authors therefore utilize the device of a secret brotherhood designed to protect the documents and prevent their becoming public. In each book the author reveals that the Church has used and continues to use the unrivalled muscle of its publicity machine against the very existence of a female deity, whose existence is actually spoken about in the secret documents
- These critical documents are obtainable by use of a very special "key"
- The "key" — in both cases a modern, contemporary key (despite the Renaissance connection) — is not a real key, but is a means of accessing containers which give further clues to the documents
- In each case the key is given to the heroine through a curator of art, and the key is hidden in or behind a painting, each painting (on wood in each case) contains

in its title the word *Madonna* or *Our Lady*.

- The relevant containers which the keys (indirectly, technologically) unlock are held in banks which themselves are located in Zurich or in banks which have a direct connection to Zurich.
- It goes without saying that the possession of the key is what gives the heroine (and hero) in each case right of access or passage into the bank, or contact with the bank's officials, who then facilitate the process of opening the vault containing the deposit box which contains the further elements in the puzzle.

The documents referred to in the previous sections contain information which is so 'explosive' (actual word used by both authors) that, across both authors, it could have devastating consequences for the future of the Catholic Church. For this reason, as the regular reader of thrillers will appreciate, there is a complex web of narrative material surrounding the announcement of the documents, the quest for their location and their final uncovering. What is remarkable is the degree of striking similarity across both Brown and Perdue with respect to this 'web of narrative material', as I have termed it.

In Perdue's DoG there is a golden key which is hidden in a painting (*The Home of the Lady of Our Redeemer*). This golden key (accompanied by a gold ingot with the account number) allows access to a safe deposit box in a Zurich bank. The key does not actually open a lock as such.

List 6: Characteristics relating to the similarities between the keys across both authors

Characteristics	Detail	Brown	Perdue
Key	Golden	✓	✓
•	Not an actual key	✓	✓
•	Secreted in or behind a Painting	✓	✓
•	Points to documents contained in a (Zurich connected) Bank vault	✓	✓

In Brown's DVC there is also a golden key, which is hidden — not in, in this case, but behind — a painting (*Madonna of the Rocks*). This is a laser-cut gold key allowing also access to a safe deposit box in a Zurich related bank. Just as in Perdue's case, Brown's key doesn't actually turn an actual lock either. Interestingly, both paintings in both sets of novels are painted on wood (in general — but not always — this tends to tie paintings to particular periods and particular regions, because wood was mostly supplanted as a painting ground by canvas).



Characteristics	Detail	Brown	Perdue
Painting	Painted on Wood	✓	✓
•	'Our Lady'/Madonna theme	✓	✓

In DVC Sophie finds the key hidden behind the painting while she and Langdon are in the Louvre. The reader will know that at the beginning of the novel we have the Louvre curator being murdered by a member of a secret brotherhood.

This dying curator leaves a written message, which he writes on the glass that covers the Mona Lisa. This message tells Sophie where to locate the key which, as mentioned above, is concealed in the same room, secreted behind the painting *Madonna of the Rocks*. The curator was actually Sophie's grandfather.

In DoG there is also a triple connection between the painting, the heroine and the curator: DoG's Zoe, the heroine is sent the painting (which contains the key) by Max (the curator) who, as it happens is also killed by a member of a secret order.

In DVC Sophie finds the key and is baffled by it, because she has no instructions about what she is to do with the key, mainly because it does not look like a 'normal' key, but rather a kind of cypher. The key in DVC is made of gold and contains a series of laser-cut pits and reliefs. It is also designed to be read by a laser. It first allows Sophie access to enter the car park and then the building of the bank. Previously I described this as a 'Zurich related' bank. What I meant by this is that the bank is in fact the Zurich Bank of Commerce in Paris. Unlike DoG, the bank is not located in Zurich, but the Zurich connection is there. Finally, in DVC, the key controls a computer operated device which gives the protagonists access to the safe deposit box which contain the documents — the details of which I will explain below, and which will be seen (as with the other aspects of this plot line) to have many resemblances to Perdue's work.

Characteristics	Detail	Brown	Perdue
Bank	Zurich connection	✓	✓

In DoG, Zoe — as mentioned above — is sent the painting. She and Seth go to the person who owned the shop where the painting was framed and in the course of this conversation, they learn that if they take the painting to a particular bank in Zurich they will have access to an important safe deposit box (as mentioned before, the key is embedded in the painting). (Perdue's painting is by a real artist but is not a real painting — the title plays on the iconic value of the words 'lady' and 'redeemer').

In Brown's book the reference is to an actual painter, Leonardo, who painted two versions

of *Madonna of the Rocks* on wood, one of which is in the National Gallery, London, with the other in the Louvre.

Perdue's key requires removal, along with the gold ingot, from the painting. The gold ingot contains the account number and is also used as a counter balance to open the vault which contains a box which in turn has to be decoded in order to reveal the secret 'explosive' documents.

In Brown's case the pitted reliefs and impressions of the golden key actuate a somewhat intricate technological device, which delivers a safe deposit box. This in turn contains a box which holds a carved wooden puzzle where the dials have to be set to the correct combination for the puzzle to open.

In Perdue's case the safe deposit box contains a briefcase with a combination which also has to be set properly. The key point is that each narrative utilizes a key which is not a conventional key to open a safe deposit box which contains another container which has to be decoded to reveal a secret — which secret, as it happens, relates to the actual divine nature of the female goddess as an integral deity of the church which the church in turn has attempted, through a secret brotherhood, to suppress, partly through murdering — in each case, the curator of a museum.

#### Further plot lines in common between Brown and Perdue

What is inside the containers found in the safe deposit boxes is information that sends the protagonists in each of the novels on the next leg of their quest. In both cases this is to another country. In Brown they are taken from Paris to London, while in Perdue the protagonists are taken from Zurich to Salzburg.

In both cases the ultimate documents are supposed to be at the destination. In Perdue's case the hero and heroine get to the documents, but in Brown there is another red herring. In Brown's case the documents are not found, but in Perdue's the documents are destroyed.

#### Conclusion: evidence of infringement is overwhelming

*In this brief summary we have looked at fewer than half of the similarities between the authors' books, and we have barely touched upon the striking similarities between the heroes and the heroines, and certain aspects of the discoveries of the documents across both sets of authors. There are many other identical or nearly identical matches across the two authors, including:*

- *the rôle of the church in more detail*
- *the secret brotherhoods (which existed to protect the documents)*
- *identical character of the 'shapeshifter' type, who while appearing to be an ally, is later exposed as an antagonist*
- *the fact that Brown's book — which has the demonstrated (and other) striking similarities referred to here — has virtually the identical title to one of Perdue's earlier books, mentioned above,*

*namely the Da Vinci Legacy (we understand that while titles in themselves are not copyrightable, the courts have held that where titles are identical or similar, textual and other striking similarities may as a result be included as ancillary evidence of infringement).*

I believe in this document I have given significant evidence of the overwhelming infringement of Mr Perdue's books by Mr Brown. Given more time for research, further outstanding parallels between the authors will be documented.

PLOT SEQUENCE SIMILARITIES AND CORRELATIONS			
	DVC	DOG/DVL	DOG
Please note that there are many, many similar correlations in the supplemental datasheets, but those have not been factored into this spreadsheet yet.			
The books are about a quest			
By an identical hero			
And an identical heroine			
Seeking extraordinary documents			
that prove the divinity of			
The identical sacred woman who had been wronged by the church and who is a symbol for the Great Goddess			
The documents will "shake the foundations" of the Catholic Church."			
The documents are so incredible they explode			
The quest is launched by the murder of an art expert			
who is dying when we first see him in the book			
and who who has a very nice office			
The art expert is the fourth member of his group to be killed.			
The art expert is about the same age			
and appearance			
And knows the Hero			
The Hero is accused of the art expert's murder.			
The art expert writes his last message in his own blood.			
The message sets the hero and heroine off on their quest			

The message is an awesome religious puzzle.		234	252
provides the Heroine a clue leading to a painting		132	55
which was painted on wood		133	52
whose name refers to the woman being worshipped in the book	see supplemental datasheet		
The provides the Heroine with a gold key that turns NO tumblers.		139	367
The golden key provides access to a safe deposit box in a Zurich Bank.		171	276
The Safe Deposit box holds another a container requiring a combination		197	316
The contents of the container from the safe deposit box are another puzzle that sends them on a trip to a distant place.			
The Quest is further complicated by a secretive brotherhood with a contentious relationship with the Vatican headed by		285	316
A man of the cloth who believes the Catholic Church has strayed and that his brotherhood's way is the true faith.	see supplemental datasheet		
The hero and heroine are stalked by a "hulk" assassin		12	8
The hulk assassin is an "educator" or directed by one.		12	8
When the hero and heroine are desperate and being pursued by the police, they turn to a former colleague, a member of the British upper-crust		218	277
The hero and heroine need help for the journey and turn to a shapeshifter who joins the Quest		219	221
The shapeshifter is very well educated		227	39
snobbish and wealthy		217	39
The Shapeshifter manipulates the hero and heroine and	see supplemental datasheet		
Also manipulates the head of a key religious brotherhood.	throughout		
The shapeshifter has no compunction about killing those close to him		387	7
The shapeshifter has an intense emotional relationship with the Catholic Church and is motivated by that.			
Leonardo's Codex Leicester is used to make an important plot point and the same mistake of fact is duplicated		412	73
Key to the documents is proof the church has conducted a spin campaign to smear the Goddess in order to support the male-domination in church ranks.		300	18
The actions are called a cover-up		37	110
		249	317

The Cover-up is necessary because Jesus was a feminist

The Hero and Heroine are cornered by a lower-ranking police officer and his fear of acting without his superior causes him to hesitate and allows the Hero and Heroine to escape.	248	205	205
Events force low-ranking policeman to pursue hero and heroine, but he loses them	270	339	
A dramatic scene of life and death with the hero and heroine present takes place in a rarity in Christian architecture, a round church	280	343	
The shapershifter acquires the prize from the hero and heroine	343	348	
When the Hero and Heroine find themselves at a loss for direction, they turn to a computer database for help	361	372	372
The shapershifter almost wins but ultimately loses the prize	377	293	
The Heroine herself is a descendant of and a symbol for the Goddess	424	396	396
The denouement concludes without the prize/Grail in hand and the sentiment	see supplemental datasheet		
That the physical objects are not important, but that the mystery and faith are the real prize.	445	409	409
	444	415	415
<b>CORRELATION</b>			
	65%	all plot points present	
		and in the same order	
Pages in each book. All correlations correct for differing page numbers to make comparisons valid.	454	400	422



# Infringement Data

HERO COMPARISON	Return to Infringement Home		
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God
DATE PUBLISHED	2003	1983	2000
NAME	Robert Langdon	Curtis Davis	Seth Ridgeway
OCCUPATION	Professor of Religious Symbolology, Harvard	Leonardo Da Vinci Scholar expert, geologist (DVL:15, 16,63,64)	Professor, Comparative Religion, UCLA (DoG:4)
SPECIALTY	Expert in Constantine, Leonardo and the Goddess	Leonardo Da Vinci Scholar expert (DVL:15, 16,63,64)	Expert in Constantine and the Goddess (DoG:4)
EDUCATION	vague, unspecified	Boston educated, MIT (DVL:63) and Cambridge (DVL:65)	vague, unspecified
EYES	Blue (DVC:8)	Blue (DVL:63)	blue (DoG:65)
HAIR	Black (DVC:8)	Dark Brown (DVL:63)	unspecified
AGE	forty-something (DVC:8)	Mid- to late-30s (DVL:63)	40 years old (DoG:9)
FACE	Strong jaw (DVC:8)	Muscular square jaw (DVL:140)	
PHOBIA	Mild Claustrophobia (DVC:ch98)		Mild Claustrophobia (DoG:ch34)"
PHYSICAL APPEARANCE	Good physical shape (DVC:9)	good physical shape (DVL:13)	Trim, good shape (DoG:9)
CURRENT APPEARANCE	Fatigued, graying hair, looking older: "The past year had taken a heavy toll on him" (DVC:ch1)"	Fatigued, looking older, bags under eyes, past months not kind to him (DVL:114)	Fatigued, looking older, bags under eyes, past six months not kind to him (DoG:Ch4, beginn)
ATTRACTIVENESS	Intriguing, woman love him (DVC:9)	Intriguing, woman love him (DVL:63)	
GREEK	Reads Greek (DVC:299)		Reads Greek (DoG:11)
PRESENCE	In much demand as a conference speaker (DVC:7,8,448)	In much demand as a conference speaker 77-80	
PRESENCE - 2	"captivating" (DVC:9) CONTEXT: at podium	"captivating" (DVL:midCh8) CONTEXT: at podium	Smile "captivated: (DoG:earlyCh2) CONTEXT: at podium
LOST LOVE	As book opens, haunted by lost love	As book opens, haunted by lost love	As book opens, haunted by lost love

	(DVC:16)	(DVL:16, 23, 114)	(DoG:35,39)
EMOTIONAL STATE	Lost love created emotional void (DVC:Ch6)	Lost love created emotional void, (DVL:23)	Lost love created: "hollow void in his chest" (DoG:ChBegin 10)
FINDING LOVE	By end of book, finds love (Heroine, Sophie)	By end of book, finds love (Heroine, Suzanne)	By end of book, finds love (Zoe)
FALSELY ACCUSED	Hero accused of the murder of a Leonardo scholar, a curator/colleague (DVC:Chapters 6, 8, 11 and subsequent)	Hero accused of the murder of Leonardo Scholars, a colleague and other people. (DVL:265,200)	Hero accused of curator/colleague murder and other people (DoG:300)
HIS QUEST	Locate and obtain the Grail documents and the tomb of the woman worshipped as a goddess, Mary Magdalene.	Searching for Grail (DVL:73) Missing Da Vinci Codex	Locate and obtain the documents and shroud of the woman worshipped as a goddess, Sophia
MOTIVATION 1	Protect heroine, Sophie	Protect Heroine, Suzanne	Protect heroine, Zoe
MOTIVATION 2	Avoid being killed by the bad guys and arrested by authorities who want him for murder.	Avoid being killed by the bad guys and arrested by authorities who want him for murder.	Avoid being killed by the bad guys and arrested by authorities who want him for murder.

# Infringement Data

HEROINE COMPARISON	Return to Plot Sequence Similarities		
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God
DATE PUBLISHED	2003	1983	2000
NAME	Sophie Neveu	Suzanne Storm	Zoe Ridgeway
OCCUPATION	Paris police officer, Cryptographer	Art journalist	Art broker, forgery detective
SECONDARY PREOCCUPATION	Art, religion	Undercover CIA agent	Religion
EDUCATION	French and English-speaking: Parisian, unspecified undergraduate and Royal Holloway (U.K.) (DVC:Ch54)	French and English-speaking: Sorbonne (Paris) Skidmore (U.S.) (DVL:62)	Dutch and English-speaking: UCLA, Stedelijk Museum, Amsterdam (DoG:111)
EYES	Green eyes (DVC:378)	green (DVL:65)	not specified
EYES: IDENTICAL WORDS	Sophie Neveu entered, her green eyes flashing fear. (DVC:ch12)	"Why did you do that?" she asked sharply, her green eyes flashing bright with the anger she battled to contain. (DVL:middle ch11)	
HAIR	"thick burgundy hair" --(DVC:50)	auburn (DVL:18)	not specified
AGE	32 (DVC:50)	26 (DVL:83)	30-ish (DoG:12,35)
PHYSICAL APPEARANCE	Distinctive, robust, not thin or "waifish" (DVC:50)	Ample figure (DVL:77)	
OUTSTANDING PSYCHOLOGICAL CHARACTERISTICS	Capable, strong, resourceful woman who saves hero at least once.	Capable, strong, resourceful woman who saves hero at least once.	Capable, strong, resourceful woman who saves hero at least once.
HERO RECOGNIZES HER EXTRAORDINARY ABILITIES	? Hero recognizes that the heroine is highly capable of taking care of the both of them. (DVC:86)	? Hero recognizes that the heroine is highly capable of taking care of the both of them. (DVL:180)	
JUMPING AT IDEAS	At the heroine's suggestion (Sophie), the reluctant and confused hero (Langdon) simulates his escape from the Louvre	? At the heroine's suggestion (Suzanne) and the reluctant and confused hero (Davis) escape from	

	restroom when she throws a bar of soap, containing a tracking device, out the window. (DVC:86)	the Brotherhood's monastery by jumping off the roof into Lake Como. (DVL:263)	
HAUNTED BY THE PAST	... were trying to speak to her and offer some kind of resolution to the emptiness that had haunted her all these years." (DVC: Ch69)	The television show, and her conduct, came back to haunt her." (DVL:Ch8, begin)	
CHILDHOOD TRAGEDY THAT SHAPED HER PERSONALITY	After parents are killed, she is raised by Grandfather who is artistic and very capable with his hands. He remains influence in her life		After mother vanishes, she is raised by father who is artistic and very capable with his hands. He remains influence in her life. (DoG:63)
GIFT	Ability to spot the code solutions others miss (DVC:77)		ability to spot art forgeries others miss (DoG:5)

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RANDOM HOUSE

9:41AM

SEP. 9.2004

# Infringement Data

<b>CODEX LEICESTER</b>	Return to Plot Sequence Similarities	
<b>AUTHOR</b>	DAN BROWN	LEWIS PERDUE
<b>BOOK TITLE</b>	The Da Vinci Code	The Da Vinci Legacy
<b>DATE PUBLISHED</b>	2003	1983
<b>MAJOR REPEATED MISTAKE:</b> Codex Leicester mistakenly described as "parchment."	"The eighteen folios—now known as Leonardo's Codex Leicester after their famous owner, the Earl of Leicester—were all that remained of one of Leonardo's most fascinating notebooks: essays and drawings outlining Da Vinci's progressive theories on astronomy, geology, archaeology, and hydrology. Langdon would never forget his reaction after waiting in line and finally viewing the priceless parchment. Utter letdown." (DVC:300)	Those of you who covered the purchase of the Codex Kingsbury may remember that in addition to being one of the few Da Vinci manuscripts never translated from Italian—and never shown to the public—it is also one of the few that Da Vinci, or his close friend Francesco Melzi, bound while he was still alive. Leonardo worked on large sheets of parchment," Curtis explained, warning to the discussion, "and covered each sheet with a bewildering variety of drawings, inventions, funny stories, and even pornographic doodles. (DVL:18)
<b>THE FACTS</b>	"He wrote [the Codex Leicester] in sepia ink on 18 double-sided sheets of loose-leaf, linen paper."	
	<a href="http://www.phm.gov.au/exhibits/archive/leonardo/notebook.htm">http://www.phm.gov.au/exhibits/archive/leonardo/notebook.htm</a>	
	Google and library searches failed to find any reference to the Codex Leicester being written on parchment.	

KINGSBURY=LEICESTER	While The Da Vinci Legacy refers to the Codex as the Codex Kingsbury, the work is unmistakably the Codex Leicester. First of all, the acknowledgement in the front of the book is to the curator of the Armand Hammer Foundation for allowing me access to the Codex Hammer.	
	Second, Da Vinci Legacy's independent oilman Harrison Kingsbury is an undisguised version of Armand Hammer.	
	Hammer bought the Codex Leicester and renamed it the Codex Hammer, an act which was paralleled in fiction by Kingsbury	
	Third, the provenance also establishes that the Codex Kingsbury and Codex Hammer are both the same work since both were part of the bequest Leonardo made to his faithful pupil Francesco Melzi.	
2nd LEICESTER SIMILARITY	Key plot point: Used as the Leonardo work to illustrate backwards writing and solve an important part of the Code. Extensive history and flashback. (DVC:300, 301)	Key plot point: The key document in Da Vinci Legacy is the Codex Leicester (DVL:acknowledgement, 18-20)

# Infringement Data

<b>GOLD KEY, PAINTING, BANK</b>	A gold key, concealed by a painting (left for the heroine) provides access to a safe deposit box in a Zurich bank. The contents of the box are more clues and not the object sought	
<b>AUTHOR</b>	DAN BROWN	LEWIS PERDUE
<b>BOOK TITLE</b>	The Da Vinci Code	Daughter of God
<b>DATE PUBLISHED</b>	2003	2000
<b>THE GOLD KEY</b>	Not a mechanical key in the usual sense. Instead, this key works indirectly but serves the same function as a traditional key. This one is a laser-embossed device which is, itself "read" by a laser. The key doesn't actually turn a lock but is valuable for the information embedded in it. (DVC:139)	Not a mechanical key in the usual sense. Instead, this key works indirectly but serves the same function as a traditional key. The key doesn't actually turn a lock but is valuable for the information embedded in it. Hidden in a painting, a key and gold ingot embedded with the account number allowing access to a safe deposit box in a Zurich bank. (DoG:13) Gold ingot actuates counterbalance to open inner vault containing the box of secrets (DoG:367)
<b>CONTEXT OF THE KEY</b>	CONTEXT: The key is made available to the heroine by an art curator who is killed. The key is mysterious, a puzzle and comes with no instructions. Further, the key offers access to an object that is not an end in itself, but a further puzzle which must be solved to reach the final goal.	CONTEXT: The key is made available to the heroine by an art curator who is killed. The key is mysterious, a puzzle and comes with no instructions. Further, the key offers access to an object that is not an end in itself, but a further puzzle which must be solved to reach the final goal.
<b>PAINTING THAT HIDES THE GOLD KEY</b>	Lady of the Rocks (DVC:132-134) by Leonardo	The Home of the Lady Our Redeemer (DoG:55) by Frederick Stahl
<b>CONTEXT OF THE LADY</b>	The "Lady" in the title refers to the book's female object of worship, Mary Magdalene, the human avatar for the Goddess	The "Lady" in the title refers to the book's female object of worship, Sophia, the human avatar for the Goddess
<b>WOODEN YOU KNOW THAT PAINTING?</b>	The painting which conceals the golden key was painted on wood. (DVC:133,134) It was transferred to canvas in 1806, and is therefore hard and brittle, incapable of being used as depicted in Da Vinci Code. (cartelfr.louvre.fr/cartelfr/viste?srv=car_not_frame&idNotice=13831)	The painting which conceals the golden key was painted on wood. (DoG:52)
<b>THE ZURICH BANK</b>	Depository Bank of Zurich (DVC:171)	Thule Gesellschaft Bank, Zurich (DoG:276)

# CONNECTION

WHAT IS IN THE  
SAFE DEPOSIT  
BOX?

1. A puzzling object that sets them off on the next stage of their quest. 2. In this case, a box containing a cryptex containing more clues. 3. The cryptex requires a combination to open it 4. Opening the combination reveals yet more puzzles and clues to continue their search. (DVC:197)

1. A puzzling set of objects and documents that sets them off on the next stage of their quest. 2. In this case, a box containing a metal briefcase containing more clues. 3. The briefcase requires a combination to open it 4. Opening the combination reveals yet more puzzles and clues to continue their search (DoG:316)



<i>The Da Vinci Code</i>	<i>The Concept Expressed</i>	<i>Daughter of God</i>
DVC:341-342		DoG:341-344
"Sophie, every faith in the world is based on fabrication..."	Christianity is built on a lie	"...it was a lie that created this situation in the first place.. The current Pope and nearly every other one before him have born false witness against the most important articles of faith"
"Metaphors are a way to help our minds process the unprocessable Every religion de-scribes God through metaphor, allegory, and exaggeration."	Metaphors help us process the unprocessable.	"We are finite creatures grappling with the infinite. Our questions are what matter. Questions and not answers matter because the answers are never whole, always limited by our physical senses"
"The Bible represents a fundamental guidepost for millions of people on the planet, in much the same way the Koran, Torah, and Pali Canon offer guidance to people of other religions."	Faith is ecumenical	"Believing is important, whether it's in Buddha, Christ, Muhammad, Vishnu, or the gods that carry the sun across the sky every day."
"Should we wave a flag and tell the Buddhists that we have proof the Buddha did not come from a lotus blossom? Or that Jesus was not born of a literal virgin birth?"	Should we expose the lies in religion, even to those who take comfort in the religion?  Living faith in the reality of false religion	"But answer this: if you are climbing a mountain and find that the rope keeping you safe has rotten fibers, do you cast off the entire rope? Will you abandon your entire faith because of the rotten fibers?"

<p>"Religious allegory has become a part of the fabric of reality. And living in that reality helps millions of people cope and be better people."</p> <p>"But it appears their reality is false."</p> <p>Langdon chuckled. "No more false than that of a mathematical cryptographer who believes in the imaginary number 'i' because it helps her break codes."</p>	<p>nevertheless helps people live their lives better.</p>	<p>"Faith binds us to the spiritual," Morgen continued. "But faith and religion have become intertwined in the same rope. In every organized religion true faith lies next to blasphemy like strands in a rope. I despair of being able to tease away the evil without destroying the whole. I am mortal and limited and don't always have the vision to truly know which fibers should remain and which should go."</p> <p>every religion has its own true glimpse of God."</p>
	<p><b>CONTEXT</b></p> <p>Note identical page position in both books and the fact that the concepts are presented in substantially the same order.</p> <p>In DVC, we have the heroine listening to the expert on religion, Hero Langdon.</p> <p>In DoG, we have the heroine listening to two experts in religion, Seth, the Hero and a priest, Hans Morgen.</p> <p>Note also reference to Buddha etc.</p>	

In both cases, the conversation takes place as they are on the run and prepare to go after the sought object (Grail documents, Sophia documents)

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RANDOM HOUSE

9:42AM

SEP. 9. 2004

## Infringement data

BUCKLING BROTHERHOODS	Return to Infringement Home			
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	The Da Vinci Code	Daughter of God
DATE PUBLISHED	2003	1983	2003	2000
NAME	Brotherhood, Priory of Sion	Eled Brotherhood of St. Peter	Opus Dei	Congregation for the Doctrine of the Faith (Cardinal Neils Braun)
LONGEVITY	Has Existed for Centuries	Has Existed for Centuries	Has existed for 69 years, since 1934	Has existed for 58 years, since approximately 1945
ORGANIZATIONAL CHARACTERISTICS	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful
FINANCIAL POSITION	Wealthy	Wealthy	Wealthy	Wealthy
RELATIONSHIP WITH VATICAN	Contentious/Adversarial	Contentious/Adversarial	Contentious/Adversarial	Contentious/Adversarial
CURRENT POSITION	They Have Grail Documents.	Have come Da Vinci Documents, need others to Consolidate Power over Vatican	Need Grail Documents to Consolidate Power over Vatican	Need Sophia documents to Consolidate Power over Vatican and be elected Pope
PURPOSE 1 FOR EXISTING: (DVC:258)	Protect the Sangreal Documents and the truth about Jesus and Mary Magdalene.	Protect the treasure house of art and documents including Leonardo Da Vinci's documents. (DVL:105, 106, 229)	Conceal the truth about Mary Magdalene and the Grail documents	Conceal the truth about Sophia, the female Messiah
PURPOSE 2 FOR	Protect tomb of Mary	Protect tomb of St. Peter	Return Church to "True"	Return Church to "True"

EXISTING: (DVC:258)	Magdalene	(DVL:225-226)	path (conservative)	truth (spiritual)	path (conservative)
PURPOSE 3 FOR EXISTING: (DVC:258)	Obsessed with perpetuating the bloodline of Jesus	Obsessed with perpetuating the bloodline of St. Peter (DVL:251)			
PURPOSE 4 FOR EXISTING: (DVC:258)	Make the proof public about the sacred feminine, the Goddess, Mary Magdalene	Keep the secrets and their power for themselves.	Keep the Grail secrets and their power for themselves.	Make the proof public about the sacred feminine, the Goddess, Sophia	Keep the truth about Sophia secret and the power for themselves.
FAMOUS PEOPLE ASSOCIATED WITH BROTHERHOOD (PARTIAL LIST)	Leonardo Da Vinci Isaac Newton, Claude Debussy, Botticelli, Victor Hugo, (DVC:326-327)	Leonardo Da Vinci Galileo, Mozart, Monteverdi, Ambrose Bierce, (DVL:213, 227)			
OH DEM BONES:	Bones of Mary Magdalene protected by her bloodline. (DVC:257)	Bones of St. Peter protected by his bloodline. (DVL:225)			

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# Infringement Data

SHAPESHIFTER	Return to Infringement Home		
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God
DATE PUBLISHED	2003	1983	2000
NAME	The Teacher (revealed at end to be Lee Teabing)	James Elliott Kimball IV	George Stratton
EDUCATION	Oxford, Harvard (Ivy League) as "backup" (DVC:227)	Ivy League (DVL:39)	Ivy League (DoG:23)
SOCIAL STANDING	Snobbish, Wealthy English blueblood (DVC:217) Knight (DVC:227)	Snobbish, wealthy New England blueblood (DVL:39)	
OCCUPATION	Historian, Grail expert (DVC:216)	Killer for the Bremen Legation (DVL:40)	Attache, American Consulate, Zurich (DoG:40)
SHAPESHIFTER ROLE	The Teacher (DVC:411-412)	Works for Russians (DVL:318)	Works for Cardinal Braun (DoG:28)
WHO DOES HE MANIPULATE?	Bishop Aringarosa, hero and heroine, assassin Silas	Brother Gregory, Hero, Heroine	Hero, heroine, U.S. government
MAIN VICTIMS	Hero and heroine turn to him for help, to their disadvantage	Hero and heroine turn to him for help, to their disadvantage	Hero and heroine turn to him for help, to their disadvantage
KILLS THOSE CLOSE TO HIM	Kills his right-hand man, Remy (DVC:386), sets up death of his key assassin, Silas (DVC:387,393)	Kills his key assassin, The Schoolmaster (DVL:7,8)	
MOTIVATION	Hates Catholic Church, wants to damage it (DVC:412)	Hates Catholic Church (DVL:3,4)	Worships Catholic Church, wants to protect it (DoG:73)
MOTIVATION 2	MOTIVATION: "Teabing has spent his life trying to broadcast the truth about the Holy Grail." (DVC:218)	out for himself	Guardian of the Secret Messiah, must keep it a secret or destroy it.

CONTEXT OF THE CONFLICT	In Da Vinci Code, the hero and heroine seem to be caught between two opposing camps, The Vatican and Opus Dei, who want control of the Grail Documents. In the end, however, we find that both groups have been manipulated by a third-party shapeshifter (Teabing) who wants the Grail documents for his own personal motivations.		In Da Vinci Legacy, the hero and heroine seem to be caught between two opposing camps, The Elect Brotherhood of St. Peter and the Bremen Legation, who want control of the Da Vinci Documents. In the end, however, we find that both groups have been manipulated by a third-party shapeshifter (Kimball) who wants the Da Vinci documents for his own personal motivations.	(DoG:81)
	EYES	hazel eyes (DVC:Ch54)	Glacial Blue eyes 37	
	HAIR	bushy red hair (DVC:Ch54)	blond hair, 6'3" (DVL:367)	fair-haired (DoG:23)
	HEIGHT	tall	6'3" (DVL:367)	Tall (DoG:23)

# Infringement Data

VILLAIN 1	Return to Plot Sequence Similarities	
AUTHOR	DAN BROWN	
BOOK TITLE	The Da Vinci Code	LEWIS PERDUE
DATE PUBLISHED	2003	Daughter of God 2000
NAME	Manuel Aringarosa	Nells Braun
OCCUPATION	Bishop, Head of Opus Dei	Cardinal, head of the Congregation for the Doctrine of the Faith (DoG:24) Archbishop of Vienna, head of the Papal Secretariat for Non-Believers (DoG:25)
HEIGHT		
EYES		Five feet, five inches tall (DVL:106)
HAIR		Heavy, black-rimmed glasses (DVL:106)
AGE		close-cropped, salt-and-pepper hair (DVL:105)
PHYSICAL APPEARANCE		
CORE RELIGIOUS BELIEF	Believes Church is too liberal, has strayed from course. He and is organization are the ones to correct this. (DVC:149)	Believes Church is too liberal, has strayed from course. He and is organization are the ones to correct this. (DoG:227-229)
MOTIVATION 1	Power: Wants to be "the most powerful man in Christendom." (Pope) (DVC:107, 151)	Obtain documents for power to be Pope (the most powerful man in Christendom) (DoG:227-229)

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MOTIVATION 2

Return Church to true, conservative path, save Opus Dei (DVC:218)

OPUS DEI (GOD'S WORK)

He is a "man of God's work" (DVC:28, 29)

Return church to true conservative path.

He is a "man of God's work" (DVL:205)

Return Church to true, conservative path (DoG:227-229)

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RANDOM HOUSE

9:43PM

SEP. 9.2004