SUPERIOR COURT BERGEN COUNTY
FILED
JUL 11 2012
DEPUTY CLERK

Batya G. Wernick
The Law Offices of Batya G. Wernick
317 Belleville Avenue
Bloomfield, NJ 07003
Phone: (973) 748-7535
Attorney for Plaintiff

WORLD MISSION SOCIETY, CHURCH OF GOD A NJ NONPROFIT CORPORATION,	SUPERIOR COURT OF NEW JERSEY LAW DIVISION BERGEN COUNTY
Plaintiff,	Civil Action
v.	Docket No. BER-L- 5274 -12
MICHELE COLON, AN INDIVIDUAL,	COMPLAINT Jury Demand
Defendant.	

COMPLAINT

COMES NOW World Mission Society, Church of God ("Plaintiff"), a New Jersey nonprofit corporation, by and through counsel, and brings the following action against Defendant Michele Colon ("Colon" or "Defendant"), and alleges as follows:

INTRODUCTION

1. This is an action for damages sustained by Plaintiff for the malicious and intentional actions of Defendant, who has published false, outrageous, and defamatory statements about Plaintiff.

2. Defendant has staged a massive defamatory campaign against Plaintiff - both in public and on the Internet.

3. Defendant conspired to damage Plaintiff's reputation and has actively solicited others to do the same.

4. Defendant's conduct has caused and continues to cause irreparable damage to Plaintiff.

THE PARTIES

5. Plaintiff World Mission Society, Church of God is a New Jersey non-profit corporation having a principal place of business located at 305 Godwin Avenue, Ridgewood, New Jersey. Plaintiff is a New Jersey branch of the World Mission Society Church of God.

6. Defendant Michele Colon is a resident of Passaic County, New Jersey. Colon is a former member of the Plaintiff church.

BACKGROUND INFORMATION REGARDING CO-CONSPIRATOR

7. Tyler Newton ("Newton") is an individual residing in the Commonwealth of Virginia in the County of Fairfax.

8. Plaintiff has filed suit against Newton in the Commonwealth of Virginia, County of Fairfax, Case No. 2011-17163.

9. Defendant and Newton joined together with the joint purpose and material intent, and acted for and as actual and apparent agents of each other, and conspired together for the common cause and purpose of committing the acts described herein that substantially injured Plaintiff.

JURISDICTION AND VENUE

10. Defendant is subject to the jurisdiction of this Court by virtue of her residence in Passaic County, New Jersey.

11. Plaintiff is a resident of Bergen County, New Jersey. Venue is therefore proper in the County of Bergen pursuant to New Jersey Rule of Court 4:3-2(a)(3).

RESERVATION OF RIGHTS

12. This case involves ongoing defamation, and an ongoing conspiracy to defame Plaintiff. Consequently, Plaintiff reserves the right to add allegations to the Complaint as the facts become available to Plaintiff.

STATEMENT OF FACTS

13. Plaintiff is a New Jersey branch of the World Mission Society Church of God. The World Mission Society Church of God, with its roots in Christianity, was founded in 1964. The Church has over 1.2 million members in about 150 countries around the world, with several branches across the United States.

14. Plaintiff is a non-profit organization that, beyond sharing its members' faith and beliefs, does good works in its community. Plaintiff has received several accolades for its community service. Most recently, Plaintiff's members and several of the Church's branches has been awarded Presidential Volunteer Service Awards. The President's Council on Service and Civic Participation created this award as a way to recognize and thank volunteers who make valuable contributions to their communities and who also, by their demonstrated commitment and example, inspire others to serve their communities.

15. Defendant and Newton have staged a massive and extensive defamatory attack on Plaintiff's reputation, both in public and on the Internet.

16. Defendant's and Newton's defamatory campaign began in or around July 2011, and is continuous and ongoing.

17. Defendant's attack on Plaintiff consists of the widespread publication of false and defamatory statements about Plaintiff. The statements are injurious to Plaintiff's name and reputation and expose Plaintiff to public contempt and aversion.

18. Defendant acted with a total disregard for the rights of Plaintiff. Beyond the intentional conduct alleged herein, this fact is further evinced by Defendant's use of phony Internet handles in an attempt to mask her identity and avoid being held accountable by Plaintiff.

19. Defendant's defamatory statements have seriously damaged, and continue to seriously damage, Plaintiff.

20. Plaintiff has lost members who have been intimidated by Defendant's attacks on Plaintiff. Members who fear harassment at work and in public have left the Church. Moreover, Plaintiff is losing prospective membership because of Defendant's conduct.

21. Plaintiff has lost prospective donative revenue from members, potential members, and other benefactors.

I. PUBLIC DEFAMATORY ATTACKS

22. On July 19, 2011, and September 6, 2011, the Village of Ridgewood, New Jersey Planning Board held public hearings concerning Plaintiff's application to extend its building. The purpose of these town hall style meetings was to determine whether Plaintiff should be granted a variance approval and exception from design standard to construct building improvements.

23. Colon attended both meetings. At the meetings Colon attacked Plaintiff by telling persons at the meeting that Plaintiff "damage[s] families, [and] ruined [her] marriage." Colon stated that "the Church takes its members' money."

24. Newton attended the meeting on September 6, 2011, where he secretly video recorded the second meetings' proceedings and persons present using his iPad tablet computer.

25. Colon actively encouraged other persons to attend the Planning Board meetings to defame Plaintiff and block its efforts at obtaining a variance approval from the Ridgewood Planning Board.

26. Plaintiff has not been granted a variance approval.

27. Colon's defamatory attacks are continuous and ongoing. As recently as June 27, 2012, Colon appeared at a child-custody trial in New York, during which she repeatedly made outlandish, derogatory, defamatory, and blatantly false statements concerning the World Mission Society, Church of God.

28. Colon's June 27, 2012 "testimony" included statements that:

a. Plaintiff forces mothers to give their children wine;

b. Plaintiff forces mothers to have their children fast;

c. Plaintiff keeps children in a room all day, and refuses to let them leave; and,

d. Plaintiff destroyed Colon's marriage by ordering her husband to divorce her.

29. Beyond these instances of public defamation, Colon and Newton have further attacked Plaintiff on the Internet by posting false and defamatory statements on

the social media website www.facebook.com ("Facebook") and on business review websites, by posting false and defamatory statements on Internet blogs, and by creating videos containing false and defamatory statements and uploading them to the website www.youtube.com ("YouTube").

II. INTERNET DEFAMATORY ATTACKS

A. Facebook

30. Newton has organized and currently administers an Internet group dedicated to attacking Plaintiff on Facebook. Newton named this group "Former Members World Mission Society Church of God Cult" ("Facebook Group").

31. Through the Facebook Group, Newton and Colon have worked in concert and have conspired both to publish defamatory statements about Plaintiff and to solicit other members of the public to join them in their attack against Plaintiff and its reputation.

32. Colon uses the handle "Wmscog Ex-Member" to post comments on the website dedicated to the Facebook Group. All conduct herein alleged to have been performed by "Wmscog Ex-Member" is alleged to have been performed by Colon.

33. "Wmscog Ex-Member" encouraged Facebook Group members "with aliases"—that is, with false Internet handles to hide their identities—to "feel free to combat . . . comments on the bottom of [an] article" published by the online newspaper NorthJersey.com praising Plaintiff's and its members' volunteer flood damage cleanup efforts with their own comments.

34. "Wmscog Ex-Member" also encouraged members of the Facebook Group to attend a third scheduled Ridgewood Planning Board meeting to attack Plaintiff's

reputation at the public hearing as a way to block Plaintiff's efforts at gaining a variance approval.

35. Upon information and belief, Newton uses the handle "James Newton" to post comments on the Facebook Group online message board. All conduct herein alleged to have been performed by "James Newton" is alleged to have been performed by Newton.

36. "James Newton" published the false and defamatory statement that Plaintiff "totally ha[s] to be laundering money" on the Facebook Group website.

B. Business Review Websites

37. Colon has launched an extensive defamatory attack against Plaintiff by publishing false and defamatory statements about Plaintiff on various online business review websites.

38. Colon uses the handles "Hailey Stevens," "haileystevens," "HaileyStevens," and "Hailey" to post comments about Plaintiff on the Internet. All statements herein alleged to have been published by any of these aliases are alleged to have been published by Colon.

39. The company Local.com offers one of the most widely recognized networks of local search websites. It owns or manages over 100,000 geo-category domain sites. These websites operate essentially as online yellow pages through which Internet users can obtain contact and location information for businesses and organizations and can also post their reviews of the same.

40. When a user posts a statement to the website www.local.com or to one of Local.com's other 100,000 plus affiliated websites, the user causes that post to be published on each of Local.com's affiliated websites.

41. "haileystevens" posted seven separate defamatory reviews about Plaintiff on the website www.local.com, or one of Local.com's affiliated websites, thereby causing the statements to be published on www.local.com and Local.com's affiliated websites.

42. In these defamatory reviews, "haileystevens" published the false and defamatory statements that Plaintiff is a "religious cult" that "destroy[s] families!!!" She further stated that Plaintiff "will destroy your family and take all of your money."

43. Beyond posting on potentially tens of thousands of Local.com websites, Colon published false and defamatory statements about Plaintiff on several other similar business review websites.

44. "Hailey Stevens" posted two defamatory reviews about Plaintiff on the review website www.yellowbot.com, including the false and defamatory statements that Plaintiff is a "religious cult" that "wil [sic] destroy your family and take all of your money," that Plaintiff's organization constitutes "Religious Fraud," and that "[m]any have had their marriages and families torn apart by this destructive mind control group."

45. "Hailey" published false and defamatory statements that Plaintiff is a "religious cult" that "will destroy your family and take all of your money!!!" to the review website www.meriden.patch.com.

46. "Hailey" published two defamatory reviews on the website www.santee.patch.com. She published the false and defamatory statements that Plaintiff

is a "religious cult" that "will destroy your family and take all of your money!!!" and that Plaintiff "destroy[s] families!"

47. "HaileyStevens" published the false and defamatory statements that "[t]he World Mission Society Church of God[]. . . . deceive[s] people into listening to them" and that "the World Mission Society Church of God . . . purposefully withhold[s] information in order to deceptively recruit" on the website www.findlocal.latimes.com.

48. "HaileyStevens" published the false and defamatory statements that Plaintiff "destroy[s] families" on the website www.aidpage.com and that Plaintiff is a "religious cult" that "destroy[s] families" on the website www.kudzu.com.

49. "Hailey" published the false and defamatory statement that Plaintiff is a "religious cult" that "destroy[s] families and rob[s] people of their money" on the website www.socialcurrent.org.

50. "Hailey" published the false and defamatory statement that Plaintiff is a "religious cult" that "wil [sic] destroy your family and take all of your money" both on the website www.chamberofcommerce.com and on the website www.dexknows.com.

51. "Hailey" published the false and defamatory statements that Plaintiff "so called church is a cult" that "will tear apart your marriage and your family," and that Plaintiff "brainwash[es] members in order to take all of their money from them" on the website www.maps.google.com.

C. Internet Discussion Forums

52. Defendant has further attacked Plaintiff by publishing false and defamatory statements about Plaintiff on various Internet discussion forums.

53. The Rick A. Ross Institute of New Jersey operates the website www.rickross.com. The website is entitled "The Ross Institute Internet Archives for the Study of Destructive Cults, Controversial Groups and Movements." This website hosts forums in which Internet users may post comments. Under the "'Cults,' Sects, and 'New Religious Movements'" forum ("Forum"), the website hosts a conversation thread entitled "Ahnsahnghong," which is the name of the Church's founder.

54. Defendant Colon uses this Forum to spread harmful defamatory statements about Plaintiff and to direct readers to other defamatory sources, including videos uploaded to YouTube.

55. Upon information and belief, Colon uses the handle "Hailey" to post comments to the Forum. All statements herein alleged to have been published to the Forum by "Hailey" are alleged to have been published by Colon.

56. "Hailey" directed Forum readers to a YouTube video she claims "explains how the World Mission Society Church of God destroys families" and to another that discusses alleged "connections between the World Mission Society Church of God and Big Shine Worldwide[,] Inc."

57. "Hailey" accused Plaintiff of being "a destructive mind control cult" on the Forum.

58. Beyond the outright defamatory comments on the Forum, "Hailey" has falsely implied that Plaintiff, a tax-exempt non-profit corporation, has an inappropriate financial relationship with the for-profit corporation Big Shine Worldwide, Inc., the president of which happens also to be Plaintiff's pastor. She has also falsely implied that

Plaintiff lies to the Internal Revenue Service ("IRS") about this alleged connection and its connections to other branches of the Church.

59. "Hailey" suggested an inappropriate financial relationship exists between Plaintiff and Big Shine Worldwide, Inc. because "[t]he 'higher ups' of the World Mission Society Church of God has a clear connection to the 'higher ups' of . . . Big Shine Worldwide, Inc.," and because Big Shine Worldwide, Inc. has locations in other countries in which the Church also has a presence. "Hailey" rhetorically asked, "Why such a strong connection to a [sic] Big Shine Worldwide?"

60. "Hailey's" statements imply that Plaintiff is hiding some financial connection to Big Shine Worldwide, Inc. from the IRS and this implication is strengthened by her directing readers to YouTube to view her video further discussing alleged "connections between the World Mission Society Church of God and Big Shine Worldwide[,] Inc."

61. "Hailey" claimed that Plaintiff lies to the IRS and that she would "expose the inconsistencies between what the World Mission Society Church of God says and what they report to the IRS." "Hailey" claimed that Plaintiff "LIES ABOUT HOW THEIR [sic] CHURCH WAS FOUNDED ON THEIR [sic] TAX EXEMPT STATUS!"

62. "Hailey" claimed that because Plaintiff and the other branches of the Church report to the IRS independently, Plaintiff "denies that [it] ha[s] any relationship to another organization despite having a clear connection to the WMSCOG in California" and despite being "controlled by the main location" in South Korea.

63. "Hailey" stated that the different branches of the church report separately to the IRS in "an attempt to minimize the appearance of their growth and remain under

the IRS's radar" to falsely imply that Plaintiff is lying to and misrepresenting its corporate status to the IRS.

64. Although Plaintiff may look to the headquarter Church in South Korea for guidance, Plaintiff and the other Church branches in America are separately organized entities for financial and tax purposes. The American branches are independent corporate entities and report as such to the IRS.

65. Colon's statements impart the false inferences that Plaintiff lies to the IRS and that Plaintiff is hiding a corporate relationship with Big Shine Worldwide, Inc.

66. These statements are reasonably read to impart the false inferences.

67. These statements affirmatively show that Colon adopts the inferences the statements impart.

68. The false inferences are defamatory.

D. Defendant Newton's Website

69. Newton operates a website and discussion forum dedicated to attacking the Church: www.examiningthewmscog.com ("Newton Website").

70. Colon is a correspondent to the Newton Website who has administrative access to the site. *See* Exhibit 1 at ¶ 6.

71. Colon acted in concert with and conspired with Newton to publish false and defamatory statements about Plaintiff on the Newton Website.

i. Five-Part Series

72. Colon posted a five-part series from a correspondent from New Jersey, who is Colon. *See* Exhibit 2. The title of this series is "How The WMSCOG Turned My Life Upside Down."

73. Colon published each of the five parts to the Newton Website.

74. The series purports to tell of Colon's recruitment to and her exit from the Church.

75. In this five-part series, Colon stated that Plaintiff sought to break up her marriage. She stated that Plaintiff "blatant[ly] attempt[ed] to cannibalize all of [her] husband's time in order to keep him away from [her]" and that "involvement [with Plaintiff] continued to turn [her] husband against [her]." In relating how she gave her husband an ultimatum concerning their marriage Colon said she told him, "[i]t was the cult or me."

76. Colon claimed Plaintiff "destroyed her marriage" and that the Church is a "destructive organization."

77. In addition to the outright defamatory comments, Defendant has falsely implied that Plaintiff is a cult that destroys families by publishing what Colon allegedly learned "[d]uring [her] research on the World Mission Society Church of God."

78. Colon stated that "an obvious pattern emerged" as Colon "read story after story about how the WMSCOG had either ruined their marriage or family." With respect to her own marriage, Colon claimed, "the WMSCOG was driving [her husband] crazy."

79. Defendant Colon falsely implied that Plaintiff is a cult that uses mind control tactics and sleep deprivation to control its members. Colon claimed her husband was called to engage in religious training with Plaintiff but that "[t]he goal of this training sounded unrealistic and seemed like a ploy to set members up to fail."

80. Colon asked rhetorical questions to support her false implications, such as, "Why not set unattainable goals for your members to keep them focused, working hard, and feeling guilty and inadequate when they can not meet your demands?"

81. Colon further stated that "[t]he WMSCOG was keeping . . . both [Colon and her husband] sleep deprived" because her husband would stay up late to study religious teachings and would wake up early to pray.

82. Colon further supported the false and defamatory implication that Plaintiff is a cult by publishing Colon's alleged research about Plaintiff on the Newton Website.

83. Colon published "[t]he most disturbing information that [Colon] had come across" which "was that the WMSCOG was said to have been using the same mind control tactics used on US prisoners of war in N. Korea." Colon stated that she "could not ignore the similarities to what she had experienced in the WMSCOG."

84. Together, these statements impart the false and defamatory inferences that Plaintiff is a destructive organization that tears families apart and uses militaristic mind control and sleep deprivation tactics to control its members.

85. These statements are reasonably read to impart these false inferences.

86. The statements affirmatively show that Defendant adopts the inferences the statements impart.

87. These false inferences are defamatory.

ii. "The WMSCOG 'Awarded by President Obama'?"

88. Defendant also falsely implied on the Newton Website that Plaintiff fraudulently deceived the Points of Light Institute—the organization that awards the Presidential Volunteer Service Award—to get that accolade.

89. Defendant published a "news" article entitled "The WMSCOG 'Awarded by President Obama'?" on the Newton Website.

90. In this article, Defendant falsely implied that it is impermissible for an organization to certify the volunteer hours of its own members or other branches and that Plaintiff impermissibly awarded itself the award by stating that Plaintiff "should not have nominated their Ridgewood, New Jersey location for the award since the 'certifying organization' would in essence be awarding [itself]."

91. Defendant supports her false implications by claiming this information comes straight from a "representative of the Presidential Volunteer Service Award office."

92. Organizations are permitted to certify the volunteer hours of their own members and other branches of the same organization so that they may be recognized by this national award.

93. Defendant Colon and Newton further state that *their* "church isn't signing up to nominate itself 'to receive such a prestigious award,'" to imply that Plaintiff's conduct was wrongful and fraudulent.

94. Defendant's statements impart the false and defamatory inference that Plaintiff employed deceit to be recognized and honored for its members' volunteer work by the Points of Light Institute.

95. These statements are reasonably read to impart this false inference.

96. The statements affirmatively show that Defendant adopts the inference the statements impart.

97. This false inference is defamatory.

E. YouTube Videos

98. Defendant Colon posted defamatory videos damaging to Plaintiff on YouTube.

99. Colon created a series of videos using a movie making service provided by the company Xtranormal. Xtranormal offers a service through its website that allows Internet users to create cartoon videos. Xtranormal provides stock characters and backgrounds—the user provides the dialogue content. The characters in the video repeat the text provided by the creator.

100. Colon provided the text repeated by the cartoon characters in the videos she created and uploaded to YouTube.

101. Upon information and belief, Colon used the Internet handle "HaileyStevens10" to upload these videos to YouTube. All conduct herein alleged to have been performed by "HaileyStevens10" is alleged to have been performed by Colon.

102. "HaileyStevens10" uploaded one such video, entitled "The World Mission Society Church of God – Destroys Families" ("Destroys Families Video"), to YouTube. In this video, Colon made several false and defamatory statements about Plaintiff including the following:

a. "The World Mission Society Church of God uses mind control tactics on its members in order to tear them apart from their families."

b. "The World Mission Society Church of God uses fear and guilt as their main tactics."

c. "The World Mission Society Church of God uses fear to prevent its members from going on vacation."

d. "The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process."

e. "Every waking moment must be focused on controlling the member's mind."

103. The statements in the Destroys Families Video are false and defamatory.

104. "HaileyStevens10" also uploaded a video entitled "World Mission Society Church of God – Public Financial Info!" ("Financial Info Video").

105. In the Financial Info Video, Colon falsely implies that World Mission Society is disguising a financial connection to Big Shine Worldwide, Inc. from the IRS.

106. Colon states that the Plaintiff "does not provide any form of financial disclosure to its members," and asks, "so where does the money go?"

107. Colon states that Plaintiff denies to the IRS that "the organization has a direct business relationship through ownership of another entity."

108. "This is where it gets interesting, folks," she claims as she states that Plaintiff's pastor and registered agent, Dong Il Lee, owns Big Shine Worldwide, Inc. and that the pastor of another branch of the Church, Jae Hoon Lee, is the Secretary of Big Shine Worldwide, Inc. This, Colon claims, "is a clear business relationship."

109. Colon states, "Well, one can assume that Jae Hoon Lee as Secretary of Big Shine Worldwide. . . is getting a paycheck from Ridgewood, New Jersey WMSCOG pastor and owner of Big Shine Worldwide, Dong Il Lee."

110. Colon states further that "[t]he discovery that Big Shine Worldwide has such close connections to the World Missions Society Church of God is quite suspect," and tells viewers that they "may want to compare the locations that Big Shine does business in and compare them to the locations where the World Mission Society Church of God operates. You will be surprised to see the amount of overlap, not just in the U.S. but overseas as well."

111. Together these statements impart the false and defamatory inferences that not only does Plaintiff disguise a business relationship with another corporate entity from the IRS but that Plaintiff also is misusing its funds to pay expenses of that corporate entity.

112. These statements are reasonably read to impart those false inferences.

113. The statements affirmatively show that Colon adopts the inferences the statements impart.

114. The false inferences are defamatory.

115. In the Financial Info Video, Colon also falsely implies that Plaintiff lies to the IRS about the source of its funds.

116. Colon claims in the video that she is reading an IRS filing from one of the Church's branches in the video and notes that the form reports receipt of "a little over $26,000 from a, quote, parental church." She implies that this is untruthful and suspect because the form does not also report a corporate subsidiary relationship to its parent Church headquartered in South Korea.

117. Plaintiff is not a corporate subsidiary of the parent Church.

118. Colon also falsely implies that the Church lies to the IRS about where the money it receives is going.

119. In the Financial Info Video, Colon notes that the branch claimed "$300,000 in missionary expenses" but states that Plaintiff's members pay their own expenses when they do missionary work, falsely implying that Plaintiff lied to the IRS about how this money was actually spent.

120. Colon promises "[m]ore information on the WMSCOG's questionable business connections and tax filings to come."

121. Colon's statements impart the false inference that Plaintiff lies to the IRS about the source of and how it uses its funding.

122. The statements affirmatively show that Colon adopts the inferences the statements impart.

123. These false inferences are defamatory.

124. All of the herein alleged statements or inferences are false and defamatory.

125. Defendant made these statements knowing the statements, or the inferences to be drawn from them, were false or, in the alternative, made the statements with reckless disregard for the truth of the statements or inferences.

F. Ridgewood.patch.com

126. Upon information and belief, Colon used the Internet handle "Tommy" to post defamatory comments about Plaintiff on the website Ridgewood.patch.com. All conduct herein alleged to have been performed by "Tommy" is alleged to have been performed by Colon.

127. "Tommy" posted a link on ridgewood.patch.com that leads readers to the forum discussed in ¶¶ 47-53, in which "Hailey" (Colon) falsely accuses Plaintiff of lying to the IRS on their application for tax exempt status.

128. Defendant's conduct has seriously damaged and continues to seriously damage Plaintiff.

129. The Court should award punitive damages to Plaintiff for Defendant's intentional, malicious, outrageous, and oppressive actions evidencing a conscious and knowing disregard for the rights and welfare of Plaintiff.

FIRST CAUSE OF ACTION
Defamation

130. Plaintiff restates as if herein set forth in full all of the allegations in Paragraphs 1-129 of this Complaint.

131. Defendant published false statements of fact about Plaintiff, as specifically alleged herein.

132. Defendant's false statements, as reasonably construed, expose Plaintiff to public hatred, contempt and ridicule and carry with them an element of disgrace and are therefore defamatory.

133. Defendant knew her public and online defamatory statements concerning Plaintiff were false. In the alternative, Defendant acted with reckless disregard for the truth of the statements and willfully failed to ascertain their truth.

134. Defendant acted willfully and maliciously intended to cause harm to Plaintiff's reputation among its members and the public.

135. Defendant's false and defamatory statements have caused, and have been a substantial factor in causing, serious damage to Plaintiff.

136. Unless and until Defendant's false and defamatory statements about Plaintiff are removed from the Internet, they will continue to seriously damage Plaintiff.

SECOND CAUSE OF ACTION
Defamation by Implication

137. Plaintiff restates as if herein set forth in full all of the allegations in Paragraphs 1-136 of this Complaint.

138. Defendant published statements about Plaintiff that impart false inferences as specifically alleged herein.

139. Defendant published statements about Plaintiff that are reasonably read to impart false inferences.

140. Defendant published statements that affirmatively suggest that they intended or endorsed the false inferences contained therein.

141. The false inferences imparted and endorsed by Defendant, as reasonably construed, expose Plaintiff to public hatred, contempt and ridicule and carry with them an element of disgrace and are therefore defamatory.

142. Defendant knew her public and online statements concerning Plaintiff would impart false inferences. In the alternative, Defendant acted with reckless disregard for the truth of the inferences imparted by their statements.

143. Defendant acted willfully and maliciously intended to cause harm to Plaintiff's reputation among its members and the public.

144. Defendant's statements have caused serious damage to Plaintiff.

145. Unless and until Defendant's statements imparting false inferences about Plaintiff are removed from the Internet, they will continue to seriously damage Plaintiff.

THIRD CAUSE OF ACTION
Civil Conspiracy

146. Plaintiff restates as if herein set forth in full all of the allegations in Paragraphs 1-145 of this Complaint.

147. Defendant agreed and acted together and in concert with Newton to damage Plaintiff by defaming Plaintiff.

148. Defendant's conduct amounts to overt acts in furtherance of her agreement with Newton to damage Plaintiff by defaming Plaintiff.

149. Defendant's conduct has directly and proximately caused serious damage to Plaintiff.

FOURTH CAUSE OF ACTION
Trade Libel

150. Plaintiff restates as if herein set forth in full all of the allegations in Paragraphs 1-149 of this Complaint.

151. As a non-profit organization, Plaintiff depends on donations of its members and other benefactors to pursue its good works in the community and for its general survival.

152. Defendant published statements derogatory to Plaintiff's business as a non-profit organization that are of a kind designed to prevent others from dealing with Plaintiff or otherwise designed to interfere with Plaintiff's relations with others.

153. The statements are false.

154. Defendant knew her public and online statements concerning Plaintiff were false. In the alternative, Defendant acted with reckless disregard for the truth of the statements and willfully failed to ascertain their truth.

155. Defendant published the above alleged statements to the public with the intent to induce others not to deal with Plaintiff.

156. Defendant's statements played a material part in inducing others not to deal with Plaintiff.

157. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered losses in the form of decreased membership and donative revenue.

158. Unless and until Defendant's derogatory and false statements about Plaintiff are removed from the Internet, Plaintiff will continue to suffer such losses.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court render Judgment against Defendant Colon and in Plaintiff's favor and grant the following relief:

A. A preliminary injunction and permanent injunction requiring Defendant and her partners, agents, employees, assignees, trustees, and all persons acting in concert or participating with Defendant to (a) immediately remove all of Defendant's false and defamatory reviews, posts, statements, and videos about Plaintiff from the Internet, including, but not limited to, those specifically alleged herein; and (b) refrain from committing further acts of the nature alleged herein;

B. An Order awarding compensatory damages in the amount of $5,000,000;

C. An Order awarding exemplary and punitive damages in the amount of $350,000;

D. An Order awarding costs of this suit, including attorneys' fees;

E. All other relief as the Court deems just and proper.

TRIAL BY JURY IS DEMANDED.

Dated: July 10, 2012

Respectfully submitted,

World Mission Society, Church of God a NJ Nonprofit Corporation,

By: Batya Wernick

Batya G. Wernick
The Law Offices of Batya G. Wernick
317 Belleville Avenue
Bloomfield, NJ 07003
Tel: (973) 748-7535
Email: bgwlaw@verizon.net

John W. Dozier, Jr., Esq.
Pro hac vice forthcoming
Virginia Bar # 20559
Dozier Internet Law, P.C.
11520 Nuckols Road, Suite 101
Glen Allen, VA 23059
Tel: (804) 346-9770
Fax: (804) 346-0800
email: jwd@cybertriallawyer.com

Attorneys for Plaintiff

NOTICE OF DESIGNATION OF TRIAL COUNSEL UNDER R. 4:25-4

Plaintiff designates **John W. Dozier** as counsel to try this action on its behalf. John W. Dozier will submit a *pro hac vice* application prior to trial of this matter.

Dated: July 10, 2012

Batya G. Wernick

JURY DEMAND

Plaintiffs hereby demand a trial by jury on all issues so triable.

Law Offices of Batya G. Wernick
Attorneys for Plaintiff World
Mission Society, Church of God

Dated: July 10, 2012

By: Batya Wernick
Batya G. Wernick, Esq

CERTIFICATION

This is to certify that the within matter is the subject of another action currently pending in the Commonwealth of Virginia, County of Fairfax, Case No. 2011-17163.

Law Offices of Batya G. Wernick
Attorneys for Plaintiff World
Mission Society, Church of God

Dated: July 10, 2012

By: Batya Wernick
Batya G. Wernick, Esq

Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial Law Division Civil Part pleadings (not motions) under *Rule* 4:5-1
Pleading will be rejected for filing, under *Rule* 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed

FOR USE BY CLERK'S OFFICE ONLY
PAYMENT TYPE: ☐ CK ☐ CG ☐ CA
CHG/CK NO.
AMOUNT:
OVERPAYMENT:
BATCH NUMBER:

1. ATTORNEY / PRO SE NAME	2. TELEPHONE NUMBER	3. COUNTY OF VENUE
Batya G. Wernick	(973) 748-7535	Bergen

4. FIRM NAME (if applicable)	5. DOCKET NUMBER (when available)
The Law Offices of Batya G. Wernick	

6. OFFICE ADDRESS	7. DOCUMENT TYPE
317 Belleville Avenue Bloomfield, NJ 07003	Complaint
	8. JURY DEMAND ■ YES ☐ NO

9. NAME OF PARTY (e.g., John Doe, Plaintiff)	10. CAPTION
World Mission Society, Church of God, Plaintiff	World Mission Society, Church of God v. Michele Colon

11. CASE TYPE NUMBER (See reverse side for listing)	12. IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ■ NO IF YOU HAVE CHECKED "YES," SEE *N.J.S.A.* 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.
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13. RELATED CASES PENDING? ■ YES ☐ NO	14. IF YES, LIST DOCKET NUMBERS Circuit Court of the Commonwealth of Virginia, No. 2011-17163
15. DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? ☐ YES ■ NO	16. NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) ☐ NONE ■ UNKNOWN

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

17. DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? ■ YES ☐ NO	IF YES, IS THAT RELATIONSHIP: ☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ■ OTHER (explain) Church/Former Church Member ☐ FAMILIAL ☐ BUSINESS

18. DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ YES ■ NO

19. USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION

20. DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? ☐ YES ■ NO	IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION
21. WILL AN INTERPRETER BE NEEDED? ☐ YES ■ NO	IF YES, FOR WHAT LANGUAGE?

22. **I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b).**

23. ATTORNEY SIGNATURE: Batya Wernick