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Attorney for the Plaintiff,
Michele Colón

MICHELE COLÓN, a New Jersey resident;

Plaintiff,

- against -

WORLD MISSION SOCIETY, CHURCH OF GOD, A NJ NONPROFIT CORPORATION; WORLD MISSION SOCIETY CHURCH OF GOD, a South Korean corporation, a.k.a. General Assembly; GIL JAH ZAHNG, a South Korean resident; JOO CHEOL KIM, a South Korean resident; DONG IL LEE, a.k.a. Daniel Lee, a New Jersey resident; TARA BYRNE, a.k.a. Tara Whalen, a New Jersey resident, RICHARD WHALEN, a New Jersey resident, VICTOR LOZADA, a New Jersey resident,

the Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L-_____ -16

Civil Action

COMPLAINT

JURY DEMAND

The Plaintiff Michele Colón ("the Plaintiff"), by and through her attorney, Paul S. Grosswald, by way of Complaint against the above-named the Defendants, hereby alleges the following:

INTRODUCTION

1. This is a SLAPP-back action, as described in LoBiondo v. Schwartz, 199 N.J. 62 (2009).
2. The Defendants previously brought two lawsuits against the Plaintiff.
3. The first lawsuit was World Mission Society, Church of God a NJ Nonprofit Corporation v. Colón, et al., Case No. 2011-17163, filed in the Circuit Court of the Commonwealth of Virginia, County of Fairfax, on or around December 6, 2011 (the "Virginia Case").

4. The second lawsuit was World Mission Society, Church of God a NJ Nonprofit Corporation v. Colón, BER-L-5274-12, filed in New Jersey Superior Court, Bergen County, on or around July 11, 2012 (the "New Jersey Case").
5. Both of those lawsuits were SLAPP suits - "Strategic Lawsuits Against Public Participation." See, e.g., LoBiondo v. Schwartz, 199 N.J. 62, 72 (2009). SLAPP suits are part of "a nationwide trend in which large commercial interests utilize[] litigation to intimidate citizens who otherwise would exercise their constitutionally protected right to speak in protest against those interests." Id. at 85. "[T]he goal of such litigation [is] not to prevail, but to silence or intimidate the target, or to cause the target sufficient expense so that he or she would cease speaking out." Id. "SLAPP suits are an improper use of our courts." Id. at 86.
6. The plaintiff in the two SLAPP suits - World Mission Society, Church of God a NJ Nonprofit Corporation ("World Mission New Jersey") - is now a Defendant in the instant case, as are all of the members of its litigation control group, and other related parties.
7. World Mission New Jersey is the New Jersey branch of the World Mission Society Church of God, which purports to be a non-profit charitable church, but is actually a profit-making global enterprise (the "World Mission Enterprise" or "World Mission").
8. The Plaintiff was a defendant in both of the SLAPP suits.
9. Both SLAPP suits also named as a co-Defendant another critic of the World Mission Enterprise, Tyler Newton (who allegedly used the alias "James Newton") ("Newton").
10. At the time, Newton owned a website that was critical of World Mission, called examiningthewmscog.com (the "Examining Website").
11. The Plaintiff is a former member and outspoken critic of World Mission New Jersey.

12. World Mission New Jersey brought the two frivolous SLAPP suits against the Plaintiff for the sole purpose of silencing her legal and truthful criticisms of the World Mission Enterprise.
13. The Plaintiff began publicly criticizing the World Mission Enterprise after being a member of World Mission New Jersey for about a year.
14. During that time, World Mission New Jersey systematically manipulated the Plaintiff and her husband until their relationship fell apart.
15. The Plaintiff was subjected to intense pressure to spend increasing amounts of time with World Mission New Jersey, thereby putting a strain on her family relationships.
16. World Mission New Jersey attempted to keep the Plaintiff and her husband sleep-deprived.
17. When the Plaintiff protested against these abuses, World Mission New Jersey began to turn her husband against her, by claiming that the Plaintiff was being "used by Satan."
18. World Mission New Jersey's pastor, Defendant Dong Il Lee openly preached the view that "salvation" was a more important priority to World Mission New Jersey than preserving marriages, and that devotion to World Mission New Jersey was a requirement to achieve such salvation.
19. As a result, the Plaintiff's marriage fell apart.
20. The Plaintiff eventually came to realize that she was not the only one this was happening to. She started realizing that many of the married members of World Mission New Jersey were ending up separated or divorced if one person in the marriage decided to no longer be a part of World Mission or openly criticized World Mission.

21. After reading stories from other victims of World Mission New Jersey, the Plaintiff discovered "an obvious pattern" of families being torn apart.
22. After conducting Internet research, the Plaintiff learned about "cults" that use "mind control" to manipulate and control their members.
23. The Plaintiff subsequently formed the opinion that World Mission New Jersey is a cult that uses mind control and destroys families.
24. The Plaintiff wrote a Five-Part Story describing her experience, called "How the WMSCOG Turned My Life Upside Down" ("Five-Part Story").
25. The Plaintiff posted the Five-Part Story to Newton's Examining Website.
26. The Plaintiff also allegedly wrote an article criticizing the manner in which World Mission New Jersey received the Presidential Volunteer Service Award (the "PVSA Article").
27. The PVSA Article was also posted to the Examining Site.
28. The Plaintiff became an activist, advocating for victims of cults in general, and for victims of the World Mission Enterprise in particular.
29. The Plaintiff began attending public meetings of the Ridgewood, New Jersey Planning Board where a variance application made by World Mission New Jersey was being discussed.
30. The Plaintiff also organized other members of the community to attend such meetings.
31. The Plaintiff even testified in a child-custody trial where World Mission New Jersey's treatment of children was at issue.
32. Thus, in order to silence the Plaintiff, World Mission New Jersey filed the Virginia Case against the Plaintiff.

33. The Plaintiff was dismissed from the Virginia Case on March 16, 2012 due to lack of personal jurisdiction.
34. After the Plaintiff was dismissed from the Virginia Case, World Mission New Jersey filed the New Jersey Case against the Plaintiff.
35. On February 9, 2015, the court in the New Jersey Case granted the Plaintiff summary judgment.
36. Due to the scheduling of other pending motions, World Mission New Jersey's time to appeal the summary judgment expired on September 16, 2015.
37. World Mission New Jersey did not appeal the summary judgment.
38. Thus, the Plaintiff prevailed in the underlying litigation as of September 16, 2015.
39. The Plaintiff now seeks to recover for emotional damages she suffered as a result of the two frivolous SLAPP suits that were brought against her.
40. The Plaintiff also seeks to recover attorney fees and costs she incurred in her defense of the two frivolous SLAPP suits.

PARTIES, JURISDICTION, & VENUE

Subject Matter Jurisdiction

41. This is an action seeking monetary relief. This Court has subject matter jurisdiction over this action pursuant to Article VI, Section III, paragraph 2 of the New Jersey Constitution, and Rule 4:3-1(a)(4).

Venue

42. Venue in this Court is appropriate pursuant to Rule 4:3-2(a)(3), in that the causes of action asserted herein arose primarily in Bergen County, and at least one of the parties, World Mission New Jersey, resides in Bergen County.

The Plaintiff

43. The Plaintiff resides at 114 Pennington Avenue, Apartment B, Passaic, NJ 07055-4780.

The Corporate Defendants

44. This Court has personal jurisdiction over Defendant World Mission Society Church of God, a South Korean corporation, a.k.a. General Assembly ("World Mission South Korea") with its principal place of business at 5-1 Sunae 1(il)-dong, Bundang-gu, Seongnamsi, Gyeonggi-do, South Korea, because World Mission South Korea directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, and is the alter ego of World Mission New Jersey.
45. This Court has personal jurisdiction over World Mission New Jersey because its principal place of business is at 305 Godwin Avenue, Ridgewood, New Jersey, 07450-3604. Pursuant to Rule 4:3-2(b), World Mission New Jersey resides in Bergen County. World Mission New Jersey is under the control and domination of World Mission South Korea, and is an alter ego of World Mission South Korea.
46. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
47. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even

if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

The Natural Person Defendants

48. This Court has personal jurisdiction over Defendant Gil Jah Zahng, a resident of South Korea, because she directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, and is the alter ego of World Mission South Korea and World Mission New Jersey. Zahng is one of two leaders of World Mission South Korea and the entire World Mission Enterprise.
49. This Court has personal jurisdiction over Defendant Joo Cheol Kim, a resident of South Korea, because he directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, is an alter ego of World Mission South Korea, and is a Trustee, Chairperson, President, and alter ego, of World Mission New Jersey. Kim is the General Pastor for World Mission South Korea. Kim is one of two leaders of World Mission South Korea and the entire World Mission Enterprise.
50. This Court has personal jurisdiction over Defendant Dong Il Lee because he is a resident of New Jersey, he directed tortious conduct into New Jersey, and caused the Plaintiff's injuries within New Jersey. Defendant Lee was a member of World Mission New Jersey's litigation control group during the two SLAPP suits. Defendant Lee is the pastor of World Mission New Jersey and a Trustee of World Mission New Jersey. Defendant Lee is also an agent of World Mission South Korea, in that he was hired by World Mission South Korea to be the pastor of World Mission New Jersey. In his job as the pastor of World Mission New

Jersey, Defendant Lee works for, answers to, and serves at the pleasure of World Mission South Korea, and its two leaders, Zahng and Kim.

51. This Court has personal jurisdiction over Defendant Tara Byrne, a.k.a. "Tara Whalen" because she is a resident of New Jersey, she directed tortious conduct into New Jersey, and caused the Plaintiff's injuries within New Jersey. Byrne was a member of World Mission New Jersey's litigation control group during the two SLAPP suits.
52. This Court has personal jurisdiction over Defendant Richard Whalen because he is a resident of New Jersey, he directed tortious conduct into New Jersey, and caused the Plaintiff's injuries within New Jersey. Whalen was a member of World Mission New Jersey's litigation control group during the two SLAPP suits.
53. This Court has personal jurisdiction over Defendant Victor Lozada because he is a resident of New Jersey, he directed tortious conduct into New Jersey, and caused the Plaintiff's injuries within New Jersey. Lozada was a member of World Mission New Jersey's litigation control group during the two SLAPP suits.
54. With respect to each cause of action alleged below, the Plaintiff's damages resulted from actions by Zahng, Kim, Lee, Byrne, Whalen, and Lozada which evidence a reckless disregard for the duties imposed by their respective positions with World Mission South Korea or World Mission New Jersey.

FACTUAL ALLEGATIONS

1. THE FOUR FRIVOLOUS COMPLAINTS FILED BY THE DEFENDANTS

55. The Defendants filed a total of four Complaints against the Plaintiff.

56. The first Complaint was filed to initiate the Virginia Case, on or around December 6, 2011 (the "Virginia Complaint").
57. The Virginia Complaint named the Plaintiff and Newton as co-Defendants.
58. The Plaintiff was dismissed from the Virginia Case on March 16, 2012 due to lack of personal jurisdiction.
59. The Virginia Case continued against Newton, until September 17, 2012, when World Mission New Jersey voluntarily dismissed the Virginia Case against Newton.
60. The second Complaint was filed to initiate the New Jersey Case, on or around July 11, 2012 (the "New Jersey Complaint").
61. The New Jersey Complaint was substantially similar to the Virginia Complaint, but did not include Newton as a co-Defendant.
62. The Plaintiff filed a motion to dismiss on August 24, 2012.
63. World Mission New Jersey filed an opposition on or around November 19, 2012.
64. At the same time, World Mission New Jersey also filed a motion to amend the Complaint, which included a Proposed Amended Complaint (the "PAC").
65. The Plaintiff filed reply papers in further support of her motion to dismiss on December 3, 2012.
66. The Plaintiff filed an opposition to World Mission New Jersey's motion to amend on December 5, 2012.
67. An oral argument on the motion to dismiss and motion to amend was held on January 11, 2013.

68. As a result of false representations made to the court by the Defendants, acting through their lawyers, which are described in more detail throughout this Complaint, the court granted the motion to amend and denied the motion to dismiss on January 11, 2013.
69. The First Amended Complaint was filed on or around January 28, 2013 (the "FAC").
70. The FAC was identical to the PAC that World Mission New Jersey had submitted with its motion papers.
71. The FAC was also substantially similar to the Virginia Complaint and the New Jersey Complaint, although it contained some stylistic changes and some additional challenged statements.
72. The FAC also added the Plaintiff's ex-husband as an additional plaintiff, and Newton as an additional Defendant.
73. World Mission New Jersey amended its pleadings a second time when it filed a Second Amended Complaint on or around April 24, 2013 (the "SAC").
74. The SAC was identical to the FAC except that an additional cause of action was added.
75. Thus, World Mission New Jersey filed a total of four Complaints against the Plaintiff: the Virginia Complaint, the New Jersey Complaint, the FAC, and the SAC.
76. All four of those Complaints were riddled with allegations that the Defendants knew to be false.

77. Each of the four Complaints set forth a series of challenged statements which the Defendants alleged had been made by the Plaintiff.
78. Each of the four Complaints alleged that the challenged statements damaged World Mission New Jersey's reputation and caused it to lose members and donations.
79. Each of the four Complaints alleged various causes of action including defamation, false light invasion of privacy, and trade libel.
80. Each of those causes of action required World Mission New Jersey to be able to prove the falsity of the challenged statements, because truthful speech is not unlawful.
81. Yet, the Defendants knew that they could not prove the falsity of the challenged statements, because the challenged statements consisted entirely of truthful facts or legally protected opinions.
82. Each of the causes of action also required World Mission New Jersey to be able to prove that the challenged statements were of and concerning World Mission New Jersey.
83. As a matter of law, if the challenged statements referred to another branch of the World Mission Enterprise, they would not be actionable in a lawsuit brought by World Mission New Jersey.
84. Also as a matter of law, if the challenged statements referred to "World Mission" generally, or to all of the World Mission entities as a group, without specific reference to World Mission New Jersey, they would not be actionable in a lawsuit brought by World Mission New Jersey.

85. Yet, the Defendants knew that they could not prove that most of the statements were of and concerning World Mission New Jersey.
86. Most of the statements were discussing World Mission as a group, or other branches of the World Mission Enterprise, and this fact was obvious from the face of the challenged statements themselves.
87. Yet, in all four of the Complaints, the Defendants deliberately edited the challenged statements to falsely make them appear as if they were discussing World Mission New Jersey.
88. The Defendants also included a number of other frivolous allegations in their various Complaints, which are described in more detail below.
89. Moreover, throughout the litigation, the Defendants engaged in frivolous and harassing conduct, such as making false representations to the court, and withholding or obstructing discovery, which is described in more detail below.
90. All four of the Complaints were filed for the purpose of harassing and intimidating the Plaintiff, retaliating against her for her truthful criticism of World Mission New Jersey and the World Mission Enterprise, and silencing that truthful criticism.

2. THE DEFENDANTS SUED THE PLAINTIFF FOR THE IMPROPER PURPOSE OF SILENCING HER SPEECH

91. The Defendants brought the Virginia Case and the New Jersey Case against the Plaintiff for the improper purpose of silencing the Plaintiff's speech.
92. Prior to filing the Virginia Case, the Defendants had their lawyer send two cease and desist letters to the Examining Website's service provider.
93. In those letters, the Defendants demanded not that certain allegedly defamatory

statements be taken down, but rather that the entire Examining Website be taken down.

94. In other words, the Defendants' motivation was to shut down the entire Examining Website, without regard to whether the statements contained on the site were true or false, defamatory or not.

95. In addition to trying to shut down the Examining Website, the Defendants were also trying to shut down the Plaintiff's activism in general.

96. World Mission New Jersey seemed to be tracking everything the Plaintiff was doing, and wherever she appeared, World Mission New Jersey turned it into a cause of action.

97. For instance, as explained in more detail elsewhere in this Complaint:

- when the Plaintiff encouraged other World Mission critics to post comments underneath an online article on NorthJersey.com praising World Mission New Jersey for its flood cleanup efforts, she got sued;
- when the Plaintiff gathered with other World Mission critics in a private Facebook group, and encouraged other members of the group to speak out and become active, she got sued;
- when the Plaintiff appeared at a Ridgewood Planning Board hearing discussing World Mission New Jersey's variance application – even though she was denied an opportunity to speak – she got sued; and
- when the Plaintiff testified in a child custody hearing about the way children and families are treated in World Mission New Jersey, she got sued.

98. None of the Plaintiff's activities were actionable, and the Defendants never had a good faith basis to believe that they would be.

99. Nevertheless, the Plaintiff had to endure over three years of litigation to defend

her right to engage in those activities.

100. The Plaintiff's speech and her activism were severely chilled during that time. She began to post material online less frequently. She refrained from posting to the internet truthful articles and statements about the World Mission Enterprise and World Mission New Jersey that she otherwise would have posted. She became much more secretive about her activities. She stopped agreeing to voluntarily give testimony in other people's legal proceedings. She was denied speaking opportunities by third parties who were intimidated by the litigation. In general, the lawsuits caused the Plaintiff to monitor and censor her own truthful speech about the World Mission Enterprise and World Mission New Jersey, and to curtail her anti-World Mission activism.
101. Those chilling effects were directly and proximately caused by the Defendants' prosecution of the Virginia Case and the New Jersey Case.
102. That was the primary goal of the litigation – to chill the Plaintiff's speech and to slow down or prevent the ongoing activism that she was engaged in prior to the lawsuits being filed.
103. In summary, the Defendants launched a full-scale attack on the Plaintiff's lawful speech and activism.
104. Such a broad attack on speech fits squarely into the definition of a SLAPP suit set forth by the New Jersey Supreme Court in LoBiondo v. Schwartz, 199 N.J. 62, 85 (2009) ("[T]he goal of such litigation [is] not to prevail, but to silence or intimidate the target, or to cause the target sufficient expense so that he or she would cease speaking out.")

105. Lawsuits designed to broadly silence lawful speech in this manner are an improper use of our courts. Id. at 86.

3. THE DEFENDANTS SUED THE PLAINTIFF FOR THE IMPROPER PURPOSE OF RETALIATING AGAINST HER FOR ENGAGING IN ADVOCACY THAT IS PROTECTED BY THE FIRST AMENDMENT

106. In ¶ 27 of the Virginia Complaint, and in ¶ 30 of the New Jersey Complaint, World Mission New Jersey alleged that the Plaintiff, or Newton, had organized and administered a Facebook group (the "Facebook Group").

107. In ¶ 28 of the Virginia Complaint, and in ¶ 31 of the New Jersey Complaint, World Mission New Jersey alleged that the Plaintiff used the Facebook Group to publish defamatory statements about World Mission New Jersey and that the Plaintiff solicited other members of the public to join in the attack against World Mission New Jersey and its reputation.

108. In fact, the Plaintiff never did publish false or defamatory comments when criticizing World Mission New Jersey, and the Defendants never had a good faith basis for believing otherwise.

109. Moreover, the Plaintiff never advocated that people use false or defamatory comments when criticizing World Mission New Jersey, and the Defendants never had a good faith basis for believing otherwise.

110. In ¶ 30 of the Virginia Complaint, and in ¶ 33 of the New Jersey Complaint, World Mission New Jersey alleged that:

[the Plaintiff] 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 [World Mission New Jersey]'s

and its members' volunteer flood damage cleanup efforts with their own comments.

111. None of the conduct attributed to the Plaintiff in that paragraph was unlawful. The Plaintiff had a First Amendment right to encourage other people to respond to comments that are posted at the bottom of a published online article. Moreover, the allegation did not say that any person posted false or defamatory statements to NorthJersey.com as a result of the Plaintiff's encouragement. No evidence of any such false or defamatory statements was ever uncovered in the ensuing litigation.

112. In ¶ 31 of the Virginia Complaint, and in ¶ 34 of the New Jersey Complaint, World Mission New Jersey alleged that the Plaintiff:

also encouraged members of the Facebook Group to attend a third scheduled Ridgewood Planning Board meeting to attack [World Mission New Jersey]'s reputation at the public hearing as a way to block the Plaintiffs efforts at gaining a variance approval.

113. Again, none of the conduct attributed to the Plaintiff in that paragraph was unlawful. The Plaintiff had a First Amendment right to encourage other people to attend a Planning Board meeting. She had a First Amendment right to encourage other people to criticize World Mission New Jersey and its reputation. She had a First Amendment right to encourage other people to oppose a variance application. Moreover, the allegation did not say that any person attended the Planning Board meeting as a result of the Plaintiff's encouragement and subsequently made false or defamatory statements about World Mission New Jersey. No evidence of any such false or defamatory statements was ever uncovered in the ensuing litigation.

114. In ¶ 66 of the FAC, and in ¶ 66 of the SAC, the Defendants alleged that:

Defendant Newton and Colón have further established a "Facebook group" wherein they have made further false statements, have urged others to view the false statements published on other websites, and urged others to publish their false statements to others.

115. That allegation was frivolous, because no other part of the complaint identified the false statements in question.

116. No evidence of any such false statements was ever uncovered in the ensuing litigation.

117. Taken together, the allegations made in ¶ 27, ¶ 28, ¶ 30, and ¶ 31 of the Virginia Complaint, and in ¶ 30, ¶ 31, ¶ 33, and in ¶ 34 of the New Jersey Complaint, and in ¶ 66 of the FAC, and in ¶ 66 of the SAC, demonstrate a pattern whereby the Defendants sought to sue the Plaintiff, without probable cause, for engaging in various types of activism against World Mission New Jersey which was protected by the First Amendment.

118. The allegations made in ¶ 27, ¶ 28, ¶ 30, and ¶ 31 of the Virginia Complaint, and in ¶ 30, ¶ 31, ¶ 33, and in ¶ 34 of the New Jersey Complaint, and in ¶ 66 of the FAC, and in ¶ 66 of the SAC, were included for the sole purpose of retaliating against the Plaintiff for exercising her First Amendment rights and intimidating her so that she would not exercise her First Amendment rights in the future.

4. THE DEFENDANTS SUED THE PLAINTIFF FOR THE IMPROPER PURPOSE OF GATHERING INTELLIGENCE ON WORLD MISSION'S CRITICS

119. The Defendants brought the Virginia Case and the New Jersey Case against the Plaintiff for the improper purpose of gathering intelligence on World Mission's critics.

120. This is obvious from the discovery that the Defendants sought.

121. For instance, in both lawsuits, the Defendants sought to discover which families and individuals World Mission New Jersey's critics were working with, so it could identify which of its members were at risk of defecting, and then take steps to block those defections.
122. In fact, the Defendants sought to discover extensive information about the Plaintiff's social network, her strategies as an activist, her work with nonprofit organizations, government investigations to which she may be providing assistance, and third parties that she and others were trying to assist with cult-related problems.
123. Such discovery demands were completely irrelevant in a defamation lawsuit where the challenged statements had nothing to do with any of those topics, or with the specific families or individuals whose identities were being sought.
124. Fortunately, the Defendants were unsuccessful in their efforts to obtain such information.
125. Nevertheless, the Defendants' use of the two lawsuits to attempt to gather broad intelligence on a known critic and her network of critics constitutes an improper use of the courts.

5. WORLD MISSION NEW JERSEY'S CLAIMS ARISING OUT OF TESTIMONY GIVEN BY THE PLAINTIFF IN A CHILD CUSTODY TRIAL WERE FRIVOLOUS

126. In ¶¶ 27 – 28 of the New Jersey Complaint, the Defendants alleged that the Plaintiff had defamed World Mission New Jersey by testifying against it in a child-custody trial.
127. According to ¶ 28 of the New Jersey Complaint, the Plaintiff testified that:

- 1) World Mission New Jersey forces mothers to give their children wine;
 - 2) World Mission New Jersey forces mothers to have their children fast;
 - 3) World Mission New Jersey keeps children in a room all day, and refuses to let them leave; and
 - 4) World Mission New Jersey destroyed the Plaintiff's marriage by ordering her husband to divorce her.
128. The Defendants knew at all relevant times that witnesses who testify in legal proceedings have immunity for civil liability arising out of such testimony.
129. Thus, the Defendants knew that they could not prevail on claims arising out of such testimony.
130. Nevertheless, the Defendants made a frivolous claim by suing the Plaintiff for her testimony.
131. The sole purposes of including the allegations in ¶¶ 27 – 28 of the New Jersey Complaint were to retaliate against the Plaintiff for testifying against World Mission New Jersey, to intimidate the Plaintiff so that she would not testify against World Mission New Jersey again, and to intimidate other witnesses who might testify against World Mission New Jersey.
132. Those purposes constitute an improper use of the courts.

6. THE DEFENDANTS' CLAIMS THAT THE PLAINTIFF INTERFERED WITH WORLD MISSION NEW JERSEY'S VARIANCE APPLICATION WERE FRIVOLOUS

133. In 2011, the Planning Board of the Village of Ridgewood, New Jersey held a series of public hearings concerning World Mission New Jersey's application for a variance relating to improvements that World Mission New Jersey wanted to

make to its property.

134. In ¶ 22 of the Virginia Complaint, in ¶ 23 of the New Jersey Complaint, in ¶ 70 of the FAC, and in ¶ 70 of the SAC, the Defendants alleged that the Plaintiff attended some of those meetings.
135. In ¶ 22 of the Virginia Complaint, in ¶ 23 of the New Jersey Complaint, in ¶ 70 of the FAC, and in ¶ 70 of the SAC, the Defendants further alleged that, at one of the meetings, the Plaintiff attacked World Mission New Jersey by telling unidentified people at the meeting that World Mission New Jersey "damage[s] families, [and] ruined [her] marriage."
136. In ¶ 22 of the Virginia Complaint, in ¶ 23 of the New Jersey Complaint, in ¶ 70 of the FAC, and in ¶ 70 of the SAC, the Defendants also alleged that, at one of the meetings, the Plaintiff stated that World Mission New Jersey "takes its members' money."
137. In ¶ 24 of the Virginia Complaint, and in ¶ 25 of the New Jersey Complaint, the Defendants further alleged that the Plaintiff actively encouraged other persons to attend the Planning Board meetings to defame World Mission New Jersey and block its efforts at obtaining a variance approval from the Ridgewood Planning Board.
138. In ¶ 25 of the Virginia Complaint, and in ¶ 26 of the New Jersey Complaint, the Defendants alleged that "the Plaintiff has not been granted a variance approval."
139. The allegations in ¶ 24 and ¶ 25 of the Virginia Complaint, and in ¶ 25 and ¶ 26 of the New Jersey Complaint, were designed to create the false impression that the Plaintiff was at fault for World Mission New Jersey's failure to obtain its

variance approval.

140. Taken together, the allegations in ¶ 22, ¶ 24, and ¶ 25 of the Virginia Complaint, in ¶ 23, ¶ 25, and ¶ 26 of the New Jersey Complaint, in ¶ 70 of the FAC, and in ¶ 70 of the SAC, were designed to make the Plaintiff believe that she was going to be held accountable for World Mission New Jersey's failure to obtain its variance approval.
141. Yet, the Defendants knew at all relevant times that the Plaintiff had nothing to do with World Mission New Jersey's failure to obtain its variance approval.
142. The Plaintiff's lack of involvement in World Mission New Jersey's failure to obtain its variance approval is apparent from the public record of the Planning Board proceedings.
143. According to the public record, at a July 19, 2011 hearing, the Planning Board's attorney complained that the Plaintiff's application was "incomplete."
144. The Board chairman also complained of "inconsistencies" in the Plaintiff's application.
145. Rather than provide the Planning Board with the additional information it requested, World Mission New Jersey continually refused to cooperate.
146. At another hearing on September 6, 2011, the Planning Board's attorney again complained that the Plaintiff's application was not complete.
147. In fact, one board member complained that he "started to create a list of things that were missing and it's just growing with every statement."

148. World Mission New Jersey undermined its own case even further by demonstrating a gross lack of respect for the authority of the Planning Board or the rule of law.
149. For instance, even after some residents complained that World Mission New Jersey had illegally repaved its parking lot without getting approval from the Planning Board, World Mission New Jersey brazenly continued to perform illegal work on its property.
150. As a result, World Mission New Jersey received two summonses.
151. World Mission New Jersey subsequently admitted on the record that the work it had done required Planning Board approval, and that the work was done without such approval.
152. The public record also shows that many people in the community were opposed to World Mission New Jersey receiving the variance.
153. In fact, Mayor Paul Aronsohn stated on the record that World Mission New Jersey's application had been "a bone of contention . . . for many years."
154. At a September 6, 2011 hearing, some of the residents testified to the Planning Board that even without the variance, traffic at the church was already extensive.
155. According to residents, the traffic often occurs at strange hours, with "long lines of cars leaving the back of that parking lot at 5:30, 6:00 in the morning."
156. The frustrations that the residents felt towards World Mission New Jersey were summed up by one neighbor, who stated on the record:

I'm kind of shocked and insulted by the casualness of some of the answers and some of the "oh I don't know" or "I didn't know that was there" or "gee." I mean how do you get involved in a project like this and not know what exists,

not know what you want to do, not know how you want to do it. So on the whole I find that extremely offensive.

157. As a result of these public humiliations suffered by World Mission New Jersey at the Planning Board hearings, World Mission New Jersey finally gave up.
158. On July 3, 2012, World Mission New Jersey withdrew its application for the variance.
159. Nevertheless, World Mission New Jersey filed the New Jersey Case eight days later, accusing the Plaintiff of being responsible for World Mission New Jersey's failure to obtain its variance approval.
160. The Defendants knew at all relevant times that it was World Mission New Jersey's own actions, and not the actions of the Plaintiff, that were responsible for World Mission New Jersey's failure to obtain the variance.
161. In fact, there is nothing in the public record to suggest that the Plaintiff had any impact on the proceedings at all.
162. To the contrary, the public record reveals that the Plaintiff made one unsuccessful attempt to be heard by the Planning Board.
163. At the July 19, 2011 hearing, the Plaintiff stood up and stated:

I was a former member of the World Mission Society
Church of God for about a year, a little over a year and I
just wanted to let the community know that this group is . .
. ."
164. At that point, David L. Rutherford, attorney for World Mission New Jersey, objected.
165. No other statement regarding World Mission New Jersey was made on the record by the Plaintiff.

166. Nevertheless, the Defendants included the allegations in ¶ 22, ¶ 24, and ¶ 25 of the Virginia Complaint, in ¶ 23, ¶ 25, and ¶ 26 of the New Jersey Complaint, in ¶ 70 of the FAC, and in ¶ 70 of the SAC, for the sole purpose of intimidating the Plaintiff into believing that she was going to be held legally responsible for World Mission New Jersey's failure to obtain a variance approval, in order to punish the Plaintiff for exercising, or attempting to exercise, her free speech rights.

7. WORLD MISSION NEW JERSEY'S CLAIMS ARISING OUT OF THE PRESIDENTIAL VOLUNTEER SERVICE AWARD ARTICLE WERE FRIVOLOUS

167. In ¶¶ 85-94 of the Virginia Complaint, in ¶¶ 88-97 of the New Jersey Complaint, in ¶¶ 49-52 of the FAC, and in ¶¶ 49-52 of the SAC, the Defendants alleged that the Plaintiff defamed World Mission New Jersey by posting the PVSA Article, which was entitled "The WMSCOG 'Awarded by President Obama'?", on the Examining Website.

168. The PVSA Article criticized World Mission New Jersey for the manner in which it received the Presidential Volunteer Service Award from the Points of Light Institute.

169. The purpose of the Presidential Volunteer Service Award is to thank and honor Americans who, by their demonstrated commitment and example, inspire others to engage in volunteer service.

170. The Presidential Volunteer Service Award is given to individual people and organizations based on the number of volunteer hours that they devote to public service.

171. Under the rules for the award program, organizations are permitted to certify the volunteer hours of their own people and other branches of the same organization.
172. However, in order to preserve the integrity of the award, there is supposed to be separation between the organization that certifies the volunteer hours and the people or branches of the organization that receive the award.
173. The certifying organization is not supposed to certify its own hours, because that would result in the certifying organization, in effect, giving itself the award, creating an apparent conflict of interest.
174. Yet, this is precisely what World Mission New Jersey did. In addition to certifying hours for World Mission New Jersey members, and for other World Mission entities, World Mission New Jersey also certified hours for itself.
175. Thus, World Mission New Jersey was both the certifying organization for the award, and the recipient of the award, creating an apparent conflict of interest.
176. The PVSA Article pointed out this conflict of interest, and expressed criticism of World Mission New Jersey because of it.
177. The PVSA Article also complained that one of the awards was given to Defendant Kim, who is not a United States citizen, as the rules of the award program require.
178. All of the facts presented in the PVSA Article were true.
179. Moreover, the Defendants knew that all of the facts presented in the PVSA Article were true.

180. In particular, Defendant Tara Byrne knew that all of the facts presented in the PVSA Article were true, because she was World Mission New Jersey's point of contact with the Points of Light Institute, and she was responsible for managing World Mission New Jersey's efforts to receive the award.
181. Nevertheless, the Defendants alleged in ¶¶ 85-94 of the Virginia Complaint, in ¶¶ 88-97 of the New Jersey Complaint, in ¶¶ 49-52 of the FAC, and in ¶¶ 49-52 of the SAC, that the PVSA Article was defamatory.
182. In order to make the PVSA Article appear defamatory, the Defendants deliberately misrepresented the content of the PVSA Article.
183. For instance, in ¶ 87 of the Virginia Complaint, and in ¶ 90 of the New Jersey Complaint, the Defendants alleged that the Plaintiff "falsely implied that it is impermissible for an organization to certify the volunteer hours of its own members or other branches."
184. Yet, a plain reading of the PVSA Article shows that the Plaintiff never implied that it was impermissible for World Mission New Jersey to certify the volunteer hours of its own members or other branches.
185. Rather, the PVSA Article complained that World Mission New Jersey had certified its own hours, not just the hours of its members or other branches, thus giving itself the award.
186. Thus, the Defendants misrepresented the content of the PVSA Article in order to make it appear defamatory, when in fact it was not.
187. Moreover, the Plaintiff had contacted a representative from the Points of Light

Institute prior to publishing the PVSA Article. That representative confirmed that World Mission New Jersey should not have certified its own hours and given itself the award.

188. The fact that the Plaintiff's communication with the representative had occurred was disclosed in the PVSA Article itself.
189. Yet, in ¶ 51 of the FAC, and in ¶ 51 of the SAC, the Defendants alleged that "no 'representative' of the Presidential Volunteer Service Award office ever advised [the Plaintiff] that 'the WMSCOG should not have nominated their Ridgewood, New Jersey location for the award.'"
190. The Defendants never had a good faith basis for believing that the communication between the Plaintiff and the representative had not occurred.
191. Yet, the Defendants continued to maintain that position throughout the litigation.
192. At the January 11, 2013 oral argument for the Plaintiff's motion to dismiss, the Defendants argued to the court, through their lawyers, that the reason they still thought the claim over the PVSA Article was valid was because they did not believe that the Plaintiff's communication with the representative had actually occurred.
193. The Defendants then argued to the court that the reason they did not believe that the Plaintiff's communication with the representative had occurred was because, according to the Defendants, the rule set forth by the Plaintiff – that a certifying organization is permitted to certify the volunteer hours of its own people and other branches of the same organization – was not actually the rule that governs the award program.

194. Yet, the Defendants admitted that was the rule in ¶ 89 of the Virginia Complaint, in ¶ 92 of the New Jersey Complaint, in ¶ 51 of the FAC, and in ¶ 51 of the SAC.
195. On April 30, 2013, the Plaintiff served World Mission New Jersey with an audio recording of a telephone conversation in which the representative once again confirmed that World Mission New Jersey should not have certified its own hours and given itself the award.
196. After receiving that audio recording, and even though the audio recording proved that the Defendants had no good faith basis for pursuing their claims over the Presidential Volunteer Service Award Article, the Defendants still refused to drop the claims over the PVSA Article.
197. By the time the case ended, the Defendants had not produced any evidence to show that the PVSA Article was false or defamatory, or that they had a good faith basis for believing that it was.

8. WORLD MISSION NEW JERSEY'S CLAIMS ARISING OUT OF A FACEBOOK POST WERE FRIVOLOUS

198. In ¶ 33 of the Virginia Complaint, and in ¶ 36 of the New Jersey Complaint, the Defendants alleged that Newton published a statement in the Facebook Group saying that World Mission New Jersey "totally ha[s] to be laundering money" (the "Facebook Post").
199. In ¶ 65 of the FAC, and in ¶ 65 of the SAC, the Defendants again alleged defamation arising out of the Facebook Post, but this time they edited the statement to make it appear that Newton said that World Mission New Jersey "is 'laundering money'," rather than "totally has to be laundering money."
200. In ¶¶ 146-49 of the Virginia Complaint, in ¶¶ 146-49 of the New Jersey

Complaint, in ¶¶ 80-87 of the FAC, in ¶¶ 93-101 of the FAC, in ¶¶ 80-87 of the SAC, and in ¶¶ 93-101 of the SAC, the Defendants asserted causes of action for conspiracy in which they attempted to hold the Plaintiff liable for the Facebook Post allegedly made by Newton.

A. The Defendants Willfully Misrepresented the Text of the Facebook Post to Mislead the Court Into Believing that It Was Of and Concerning World Mission New Jersey When They Knew It Was Not

201. The Defendants had a copy of the Facebook Post in their possession at all relevant times during the pendency of the Virginia Case and the New Jersey Case.
202. Thus, the Defendants understood that the Facebook Post was made in response to a statement posted by someone calling herself "Mary Brown." To understand the full context of the Facebook Post, both Mary Brown's statement and Newton's statement must be read together:

Mary Brown: Another thing we need to do is to follow the money trail. If we could find out that these Pastors are rich men rather than the poor, righteous people they say they are, it would be illuminating. My son said his pastor is poor, but then I see him listed as the Secretary for Bigshine Worldwide, Inc. I swear, they are laundering money.

James Newton (Tyler Newton): they totally have to be laundering money.. Wmscog Ex-Member has tried contacting several agencies, but no one seems to take them seriously.. there is one or two agencies left on the radar though, and one has expressed interest in the records that Ex-Member has accumulated

(capitalization and punctuation errors in original).

203. In this exchange, the accusation of money laundering was introduced by Mary Brown. Mary Brown never identified a specific branch of the World Mission Enterprise that she was accusing of money laundering. Rather, she was generally

referring to the entire World Mission Enterprise as a group.

204. The only specific reference made by Mary Brown was to her son's pastor, who is also the Secretary for Bigshine Worldwide, Inc. ("Big Shine"). Mary Brown did not identify which branch her son and his pastor belong to, but to anyone familiar with the World Mission Enterprise and Big Shine, it would have been understood that Mary Brown was referring to a World Mission entity in Illinois, not World Mission New Jersey.
205. Newton responded to Mary Brown by agreeing with her "money laundering" conclusion, but he was also speaking generally about the World Mission Enterprise as a group.
206. Alternatively, Newton could have been referring to the World Mission entity in Illinois.
207. In any case, there was nothing in Newton's statement to indicate that he was referring specifically to World Mission New Jersey.
208. Nevertheless, when the Defendants quoted from the Facebook Post in ¶ 33 of the Virginia Complaint, in ¶ 36 of the New Jersey Complaint, in ¶ 65 of the FAC, and in ¶ 65 of the SAC, they deliberately edited the quote to make it appear that the statement was of and concerning World Mission New Jersey.
209. Specifically, in ¶ 33 of the Virginia Complaint, and in ¶ 36 of the New Jersey Complaint, the Defendants inserted the word "the Plaintiff" before the quoted language "totally ha[s] to be laundering money," thus producing the following allegation:

"James Newton" published the false and defamatory statement that the Plaintiff "totally ha[s] to be laundering

money" on the Facebook Group website.

210. Likewise, in ¶ 65 of the FAC, and in ¶ 65 of the SAC, the Defendants inserted the words "Plaintiff World Mission" before the quoted language "laundering money," thus producing the following allegation:

Defendant Newton posted on facebook.com, stating that Plaintiff World Mission is "laundering money".

211. The only purpose of this editing was to create the false appearance that the Facebook Post was of and concerning World Mission New Jersey, even though the Defendants knew it was not.
212. The Defendants understood at all relevant times that World Mission New Jersey could not maintain its claims arising out of the Facebook Post unless the Facebook Post was of and concerning World Mission New Jersey.
213. Thus, the Defendants willfully lied about what the Facebook Post said in order to make a frivolous claim appear like a valid claim.

B. The Defendants Had No Good Faith Basis for Blaming the Plaintiff for the Facebook Post

214. The Defendants had no basis in law or fact for claiming liability against the Plaintiff for the Facebook Post.
215. The Defendant's only basis for assigning liability to the Plaintiff was the fact that the Plaintiff, like Newton, was a critic of the World Mission Enterprise and an anti-cult activist.
216. The Defendants never alleged any facts to suggest that the Plaintiff had written the Facebook Post, encouraged Newton to write it, or even knew that the Facebook Post was going to be posted before it was posted.

217. In fact, the Plaintiff did not write the Facebook Post, did not encourage Newton to write it, and did not know that the Facebook Post was going to be posted before it was posted.

218. The Defendants never had any good faith basis for believing otherwise, and no such evidence was uncovered during the ensuing litigation.

C. The Defendants Falsely Claimed That World Mission New Jersey Had Been Damaged By the Facebook Post

219. The Defendants knew at all relevant times that World Mission New Jersey had not been damaged by the Facebook Post.

220. The Facebook Post was posted in a private Facebook group (the "Facebook Group").

221. The Facebook Group consisted of about forty members, all of whom identified themselves as critics of World Mission.

222. Postings to the Facebook group were not visible to the general public.

223. Rather, the postings were only visible to other members of the group.

224. At some point, Defendant Lozada, an agent of World Mission New Jersey, infiltrated the Facebook Group by pretending to be a critic of the World Mission Enterprise so that the Facebook group's moderator would extend him an invitation and login credentials.

225. Once Lozada had access to the Facebook Group, he was able to view all of the comments that were made by the other group members.

226. That is how the Defendants came to learn about the Facebook Post.

227. The Defendants never alleged that the Facebook Post was ever re-published in another forum where more people could see it.

228. In fact, the Facebook Post was not ever re-published.
229. That necessarily means that the Defendants were aware at all relevant times that the only people who had seen the Facebook Post were people who already held the World Mission Enterprise, and World Mission New Jersey, in low esteem. That is why the Facebook Group members joined the Facebook Group in the first place - they were looking for other critics to network with.
230. Nevertheless, the Defendants continued to falsely assert throughout the duration of the Virginia Case and the New Jersey Case that World Mission New Jersey had been damaged as a result of World Mission New Jersey members and prospective members withholding donations after reading the Facebook Post.
231. The Defendants never had any good faith basis to support the allegation that World Mission New Jersey was damaged by the Facebook Post, and they knew at all relevant times that the allegation was false.
232. When the Plaintiff called the Defendants out on this point during the New Jersey Suit, the Defendants responded by claiming that World Mission New Jersey had been damaged because Lozada had seen the statement.
233. Yet, at the time that the Defendants made that assertion, they knew that Lozada was an agent of World Mission New Jersey and a member of its litigation control group.
234. The Defendants further knew that Lozada had not left World Mission New Jersey or withheld any donations from World Mission New Jersey as a result of his reading the Facebook Post.
235. In other words, instead of withdrawing the Facebook Post claim after the Plaintiff

pointed out that the claim was frivolous, the Defendants continued to prosecute the claim by making additional frivolous arguments.

236. The only purposes for the Defendants' continued prosecution of the Facebook Post claim were to invade the safe space of World Mission's critics, to make them afraid to continue talking to each other, and to harass and intimidate the Plaintiff so she would stop communicating with World Mission's critics in the Facebook Group.

237. Those purposes constitute an improper use of the courts.

9. THE DEFENDANTS SUED THE PLAINTIFF FOR STATEMENTS THAT THEY KNEW WERE NOT OF AND CONCERNING WORLD MISSION NEW JERSEY

238. Prior to suing the Plaintiff, the Defendants searched the Internet for statements that they could sue the Plaintiff for.

239. Because the plaintiff in the Virginia Case and in the New Jersey Case was World Mission New Jersey, the Defendants understood that they could only sue for defamation over statements that were of and concerning World Mission New Jersey.

240. Yet, when the Defendants searched the Internet for statements they could sue over, it turned out that most of the statements they found were not of and concerning World Mission New Jersey.

241. Rather, the statements the Defendants found were discussing other branches of the World Mission Enterprise, or the World Mission Enterprise in general, without specifically referring to World Mission New Jersey.

242. Throughout the Virginia Complaint, the New Jersey Complaint, the FAC, and the SAC, the Defendants edited the challenged statements in order to deceive the

Court into thinking the challenged statements were of and concerning World Mission New Jersey, even though the Defendants knew that the edited statements were not of and concerning World Mission New Jersey.

A. Business Review Site Statements That Were Not Of and Concerning World Mission New Jersey

243. In ¶¶ 38 and 39 of the Virginia Complaint, in ¶¶ 41 and 42 of the New Jersey Complaint, in ¶ 30(a) of the FAC, and in ¶ 30(a) of the SAC, the Defendants alleged that the Plaintiff had posted defamatory reviews of World Mission New Jersey on Local.com. According to the Defendants, the Plaintiff stated that World Mission New Jersey is a "religious cult" that "destroy[s] families!!!" and that World Mission New Jersey "will destroy your family and take all of your money."

244. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Deer Park, Texas.

245. In ¶ 41 of the Virginia Complaint, in ¶ 44 of the New Jersey Complaint, in ¶ 30(b) of the FAC, and in ¶ 30(b) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.yellowbot.com, saying that World Mission New Jersey is a "religious cult" that "wil [sic]¹ destroy your family and take all of your money," that World Mission New Jersey constitutes "Religious Fraud," and that "[m]any have had their marriages and families torn apart by this destructive mind control group."

246. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Santee,

¹ Typographical error comes from original challenged statement as posted.

California.

247. In ¶ 43 of the Virginia Complaint, in ¶ 46 of the New Jersey Complaint, in ¶ 30(c) of the FAC, and in ¶ 30(c) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.santee.patch.com or patch.com saying that World Mission New Jersey is a "religious cult" that "will destroy your family and take all of your money!!!" and that World Mission New Jersey "destroy[s] families!"
248. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Santee, California.
249. In ¶ 44 of the Virginia Complaint, in ¶ 47 of the New Jersey Complaint, in ¶ 30(d) of the FAC, and in ¶ 30(d) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.findlocal.latimes.com saying 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."
250. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Los Angeles, California.
251. In ¶ 46 of the Virginia Complaint, in ¶ 49 of the New Jersey Complaint, in ¶ 30(g) of the FAC, and in ¶ 30(g) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.socialcurrent.org saying that World Mission New Jersey is a "religious cult" that "destroy[s] families and rob[s] people of their money".

252. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Bloomingdale, Illinois.
253. In ¶ 47 of the Virginia Complaint, in ¶ 50 of the New Jersey Complaint, in ¶ 30(h) of the FAC, and in ¶ 30(h) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.chamberofcommerce.com saying that World Mission New Jersey is a "religious cult" that "wil [sic]² destroy your family and take all of your money".
254. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Santee, California.
255. In ¶ 47 of the Virginia Complaint, in ¶ 50 of the New Jersey Complaint, in ¶ 30(h) of the FAC, and in ¶ 30(h) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.dexknows.com saying that World Mission New Jersey is a "religious cult" that "wil [sic]³ destroy your family and take all of your money."
256. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity located in Deer Park, Texas.

B. Ross Site Statements That Were Not Of and Concerning World Mission New Jersey

257. In ¶ 53 of the Virginia Complaint, and ¶ 56 of the New Jersey Complaint, the

² Typographical error comes from original challenged statement as posted.

³ Typographical error comes from original challenged statement as posted.

Defendants alleged that the Plaintiff posted statements on www.rickcross.com (the "Ross Site") in which she directed readers to a YouTube video and claimed that the video "explains how the World Mission Society Church of God destroys families" (the "Destroys Families Video").

258. Yet, the Destroys Families Video was not referring to World Mission New Jersey. Rather, the statements in the video were referring globally to all World Mission entities as a group.
259. In ¶ 54 of the Virginia Complaint, in ¶ 57 of the New Jersey Complaint, in ¶ 36 of the FAC, and in ¶ 36 of the SAC, the Defendants alleged that the Plaintiff posted a statement on the Ross Site in which she accused World Mission New Jersey of being "a destructive mind control cult".
260. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring to a World Mission entity in Illinois.
261. In ¶ 55 of the Virginia Complaint, and in ¶ 58 of the New Jersey Complaint, the Defendants alleged that the Plaintiff falsely implied that World Mission New Jersey lies to the IRS about its connections to Big Shine and other branches of World Mission.
262. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring to a World Mission entity in Illinois.
263. In ¶ 58 of the Virginia Complaint, in ¶ 61 and ¶ 127 of the New Jersey Complaint, in ¶ 33 of the FAC, and in ¶ 33 of the SAC, the Defendants alleged that the Plaintiff posted a statement on the Ross Site in which she stated that World Mission New Jersey lies about how the church was founded on its application for

tax exemption status.

264. Yet, the statement in question was not referring to World Mission New Jersey.

Rather, the statement was referring to a World Mission entity in California.

265. In ¶ 59 of the Virginia Complaint, and in ¶ 62 of the New Jersey Complaint, the

Defendants alleged that the Plaintiff posted a statement in which she stated that

World Mission New Jersey "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.

266. Yet, the statements in question were not referring to World Mission New Jersey.

Rather, the statements were referring to a World Mission entity in Illinois.

267. In ¶ 34 of the FAC, and in ¶ 34 of the SAC, the Defendants alleged that the

Plaintiff posted the following statement on the Ross Site:

"Does the organization control or is it controlled by any other organization?". The WMSCOG checked off "NO". The WMSCOG locations are NOT independent and are all controlled by the main location in Seoul, S. Korea. Why would they answer "NO" to this question?

268. In ¶ 35 of the FAC, and in ¶ 35 of the SAC, the Defendants asserted that World

Mission New Jersey:

is not "controlled by the main location in Seoul S. Korea."
It is an independent entity, legally and functionally.

269. Yet, the statements in question were not referring to World Mission New Jersey.

Rather, the statements were referring to a World Mission entity in Illinois.

270. In ¶ 60 of the Virginia Complaint, and in ¶ 63 of the New Jersey Complaint, the

Defendants alleged that the Plaintiff posted a statement in which she stated that

"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 World Mission New Jersey is lying to and misrepresenting its corporate status to the IRS.

271. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring globally to all World Mission entities as a group, or to a World Mission entity in Illinois.

C. YouTube Video Statements That Were Not Of and Concerning World Mission New Jersey

272. In ¶ 99 of the Virginia Complaint, in ¶ 102 of the New Jersey Complaint, in ¶¶ 53-58 of the FAC, and in ¶¶ 53-58 of the SAC, the Defendants alleged that the Plaintiff posted the Destroys Families Video to YouTube, which was entitled "The World Mission Society Church of God - Destroys Families."

273. In ¶ 99(a) of the Virginia Complaint, in ¶ 102(a) of the New Jersey Complaint, in ¶ 54 of the FAC, and in ¶ 54 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses mind control tactics on its members in order to tear them apart from their families."

274. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring globally to all World Mission entities as a group.

275. In ¶ 99(b) of the Virginia Complaint, and in ¶ 102(b) of the New Jersey Complaint, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses fear and guilt as their main tactics."

276. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring globally to all World Mission entities as a group.
277. In ¶ 99(c) of the Virginia Complaint, in ¶ 102(c) of the New Jersey Complaint, in ¶ 55 of the FAC, and in ¶ 55 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses fear to prevent its members from going on vacation."
278. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring globally to all World Mission entities as a group.
279. In ¶ 99(d) of the Virginia Complaint, in ¶ 102(d) of the New Jersey Complaint, in ¶ 56 of the FAC, and in ¶ 56 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process."
280. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring globally to all World Mission entities as a group.
281. In ¶ 99(e) of the Virginia Complaint, in ¶ 102(e) of the New Jersey Complaint, in ¶ 57 of the FAC, and in ¶ 57 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "Every waking moment must be focused on controlling the member's mind."
282. Yet, the statement in question was not referring to World Mission New Jersey.

Rather, the statement was referring globally to all World Mission entities as a group.

283. In ¶ 101 of the Virginia Complaint, in ¶ 104 of the New Jersey Complaint, in ¶ 59 of the FAC, and in ¶ 59 of the SAC, the Defendants alleged that the Plaintiff posted a video to YouTube entitled "World Mission Society Church of God - Public Financial Info!" (the "Financial Info Video").
284. In ¶ 103 of the Virginia Complaint, in ¶ 106 of the New Jersey Complaint, in ¶ 60 of the FAC, and in ¶ 60 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that World Mission New Jersey "does not provide any form of financial disclosure to its members." Then the Plaintiff allegedly asked, "So where does the money go?"
285. Yet, the statements in question were not referring to World Mission New Jersey. Rather, the statements were referring globally to all World Mission entities as a group, or to a World Mission entity in Illinois.
286. In ¶ 104 of the Virginia Complaint, in ¶ 107 of the New Jersey Complaint, in ¶ 60 of the FAC, and in ¶ 60 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that World Mission New Jersey denies to the IRS that "the organization has a direct business relationship through ownership of another entity."
287. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring to a World Mission entity in Illinois.
288. In ¶ 113 of the Virginia Complaint, in ¶ 116 of the New Jersey Complaint, in ¶ 62 of the FAC, and in ¶ 62 of the SAC, the Defendants alleged that, in the Financial

Info Video, the Plaintiff stated that she was reading an IRS filing from one of the Church's branches and noted that the form reports receipt of "a little over \$26,000 from a, quote, parental church," while stating that this is suspect because the form did not also report a corporate subsidiary relationship to its parent church headquartered in South Korea.

289. In ¶ 114 of the Virginia Complaint, in ¶ 117 of the New Jersey Complaint, in ¶ 63 of the FAC, and in ¶ 63 of the SAC, the Defendants asserted that such statement was false because World Mission New Jersey is not a corporate subsidiary of a parent church.

290. Yet, the statement in question was not referring to an IRS filing made by World Mission New Jersey. Rather, the statement was referring to an IRS filing made by a World Mission entity in Illinois. In other words, the statement was implying that the World Mission entity in South Korea was the parent corporation of the World Mission entity in Illinois. The statement made no reference to World Mission New Jersey, and did not assert any position as to whether or not World Mission New Jersey is a corporate subsidiary of a parent church.

291. In ¶ 116 of the Virginia Complaint, and in ¶ 119 of the New Jersey Complaint, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that a World Mission branch had claimed "\$300,000 in missionary expenses" in an IRS filing. According to the Defendants, the Plaintiff then stated that World Mission New Jersey's members pay their own expenses when they do missionary work. According to the Defendants, the Plaintiff's statements falsely implied that World Mission New Jersey lied to the IRS about how this money was actually spent.

292. Yet, the statement in question was not referring to an IRS filing made by World Mission New Jersey. Rather, the statement was referring to an IRS filing made by a World Mission entity in Illinois. In other words, the statement was implying that the World Mission entity in Illinois lied to the IRS about how this money was actually spent. The statement made no reference to World Mission New Jersey, and did not assert any position as to whether or not World Mission New Jersey lies to the IRS about how its money is spent. In fact, the Defendants even acknowledged in ¶ 116 of the Virginia Complaint, and in ¶ 119 of the New Jersey Complaint, that the challenged statement pertained to a World Mission "branch," rather than World Mission New Jersey.
293. In ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants again stated that the Plaintiff made the statement regarding the \$300,000 in missionary expenses, but this time, instead of acknowledging that the statement referred to another World Mission branch, the Defendants falsely claimed that the statement referred to World Mission New Jersey.
294. In ¶ 117 of the Virginia Complaint, in ¶ 120 of the New Jersey Complaint, in ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff promised "[m]ore information on the WMSCOG's questionable business connections and tax filings to come."
295. In ¶ 118 of the Virginia Complaint, in ¶ 121 of the New Jersey Complaint, in ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants alleged that the Plaintiff's statement that more information is coming implied that World Mission New Jersey lies to the IRS about the source of and use of its funding.

296. Yet, the statement in question was not referring to World Mission New Jersey. Rather, the statement was referring to a World Mission entity in Illinois, or globally to all World Mission entities as a group.

D. The Defendants Knew the Statements Described Herein Were Not Of and Concerning World Mission New Jersey

297. Prior to filing the Virginia Case, and at all relevant times during the pendency of the Virginia Case, the Defendants were aware that the challenged statements described herein were not of and concerning World Mission New Jersey.

298. Prior to filing the Virginia Case, and at all relevant times during the pendency of the Virginia Case, the Defendants were aware of what was actually said in the challenged statements described herein, what was said in the presentation of those statements in the Virginia Complaint, and the degree to which the statements were edited in the Virginia Complaint in order to deceive the court by creating the false appearance that the statements were of and concerning World Mission New Jersey.

299. Prior to filing the New Jersey Case, and at all relevant times during the pendency of the New Jersey Case, the Defendants were aware that the challenged statements described herein were not of and concerning World Mission New Jersey.

300. Prior to filing the New Jersey Case, and at all relevant times during the pendency of the New Jersey Case, the Defendants were aware of what was actually said in the challenged statements described herein, what was said in the presentation of those statements in the New Jersey Complaint, in the FAC, and in the SAC, and the degree to which the statements were edited in the New Jersey Complaint, in

the FAC, and in the SAC, in order to deceive the court by creating the false appearance that the statements were of and concerning World Mission New Jersey.

10. AFTER THE PLAINTIFF PRODUCED COPIES OF THE CHALLENGED STATEMENTS PROVING THEY WERE NOT OF AND CONCERNING WORLD MISSION NEW JERSEY, THE DEFENDANTS EXTENDED THE LITIGATION BY FALSELY CLAIMING THAT THE CHALLENGED STATEMENTS PRODUCED BY THE PLAINTIFF WERE NOT AUTHENTIC

301. The previous section sets forth a number of challenged statements alleged in the Virginia Complaint, the New Jersey Complaint, the FAC, and the SAC that were not of and concerning World Mission New Jersey (the "non-New Jersey statements").

302. At all relevant times, the Defendants were aware that the non-New Jersey statements were not of and concerning World Mission New Jersey.

303. Yet, if the Defendants had admitted early in the litigation that the non-New Jersey statements were not of and concerning World Mission New Jersey, then all of the claims related to the non-New Jersey statements would have been dismissed early in the litigation.

304. To prevent this from happening, the Defendants deliberately lied to the court and to the Plaintiff, repeatedly and through their lawyers, by claiming that the non-New Jersey statements were actually of and concerning World Mission New Jersey.

305. To rebut this assertion, the Plaintiff, during the New Jersey Case, repeatedly demanded that the Defendants produce copies of the challenged statements, including the non-New Jersey statements.

306. The Defendants necessarily had such copies in their possession, because they quoted from the challenged statements when drafting each of the Complaints.
307. Yet, the Defendants refused to produce the challenged statements, because they knew that if they did so the court would discover that they were suing over statements that were not of and concerning World Mission New Jersey.
308. Thus, the Plaintiff searched for the non-New Jersey statements herself, by looking online for statements that matched the descriptions provided in the various Complaints.
309. The Plaintiff found the non-New Jersey statements online, and submitted copies of them to the court on August 24, 2012 and on December 3, 2012 in support of her motion to dismiss.
310. The non-New Jersey statements produced by the Plaintiff on August 24, 2012 and December 3, 2012 matched the descriptions of the challenged statements set forth in the New Jersey Complaint (and subsequently set forth in the FAC and the SAC), except for one detail – they were explicitly referring globally to all World Mission entities as a group, or to other World Mission branches, and were not of and concerning World Mission New Jersey.
311. Had the Defendants admitted that the statements produced by the Plaintiff on August 24, 2012 and December 3, 2012 were in fact the statements they were suing over, the claims relating to each of the non-New Jersey statements would have been dismissed from the case at the motion to dismiss stage.
312. Instead, however, the Defendants chose not to tell the truth.
313. The Defendants falsely claimed repeatedly and through their lawyers, that the

non-New Jersey statements produced by the Plaintiff on August 24, 2012 and December 3, 2012 were not the same as the statements that the Defendants were suing over.

314. The Defendants claimed that there were other versions of the non-New Jersey statements that had been posted online at some point in time.
315. The Defendants claimed that those other versions of the non-New Jersey statements were in fact of and concerning World Mission New Jersey.
316. The Defendants claimed that those other versions of the non-New Jersey statements would be uncovered through the discovery process.
317. Yet, the Defendants never had any good faith basis for believing that there were other versions of the non-New Jersey statements.
318. No other versions of the non-New Jersey statements were ever discovered by any party by the time the New Jersey case came to an end.
319. At all relevant times after August 24, 2012 and December 3, 2012, the Defendants knew that the non-New Jersey statements produced by the Plaintiff on those dates were identical to the statements the Defendants had been looking at when they were formulating the Virginia Case and the New Jersey Case.
320. At all relevant times after August 24, 2012 and December 3, 2012, the Defendants knew that they had no knowledge of any other versions of the non-New Jersey statements that made reference to World Mission New Jersey.
321. At all relevant times after August 24, 2012 and December 3, 2012, the Defendants knew that they had no basis for believing that there were any other versions of the non-New Jersey statements, or that any other versions had ever existed.

322. Yet, on January 11, 2013, during an oral argument for the Plaintiff's motion to dismiss, the Defendants falsely represented to the court, repeatedly and through their lawyers, that the statements produced by the Plaintiff on August 24, 2012 and December 3, 2012 were not identical to the statements that World Mission New Jersey was suing over.
323. As a result of those false representations, the court denied the Plaintiff's motion to dismiss the New Jersey Case.
324. Instead, the court granted World Mission New Jersey's motion to file the FAC, which contained allegations arising out of the same non-New Jersey statements contained in the New Jersey Complaint.
325. Thus, by lying about the non-New Jersey statements they were suing over and by falsely claiming that other versions of the statements existed, the Defendants fraudulently survived a motion to dismiss and extended the litigation.
326. After the January 11, 2013 oral argument, it took over two more years for the litigation to finally come to an end.

11. THE DEFENDANTS SUED THE PLAINTIFF FOR STATEMENTS THAT THEY KNEW WERE NOT FALSE OR DEFAMATORY

327. In order for the Defendants to have prevailed in their defamation suits against the Plaintiff, they would have needed to prove that the challenged statements were false.
328. Yet, there is not one single challenged statement alleged in the Virginia Complaint, the New Jersey Complaint, the FAC, or the SAC, that could have been proven false.
329. Prior to the filing of the Virginia Case, during the pendency of the Virginia Case,

prior to the filing of the New Jersey Case, and during the pendency of the New Jersey Case, the Defendants knew that they would not be able to prove that any of the challenged statements were false.

A. Planning Board Statements Were Not False

330. In ¶ 22 of the Virginia Complaint, and in ¶ 23 of the New Jersey Complaint, the Defendants alleged that the Plaintiff attended Planning Board meetings where she attacked World Mission New Jersey by telling unidentified people at the meeting that the Plaintiff "damage[s] families, [and] ruined [her] marriage."

331. Yet, at all relevant times the Defendants knew that it was true that World Mission New Jersey damages families and ruined the Plaintiff's marriage.

332. Specifically, the Defendants knew that World Mission New Jersey had a policy or practice of teaching its members that devotion to World Mission is more important than devotion to one's family, and that World Mission members should be willing to abandon their families to serve World Mission if their families were not fully devoted to World Mission.

333. Moreover, the Defendants knew that such teachings had, in the past, caused many World Mission members to become alienated from their families.

334. The Defendants also knew that such teachings had caused the Plaintiff's husband to abandon her.

335. In fact, Defendant Lee had instructed the Plaintiff's husband to divorce the Plaintiff, and assigned high-ranking World Mission New Jersey members as handlers for the Plaintiff's husband, to make sure that he divorced the Plaintiff.

336. In ¶ 22 of the Virginia Complaint, and in ¶ 23 of the New Jersey Complaint, the

Defendants also alleged that the Plaintiff stated that World Mission New Jersey "takes its members' money."

337. Yet, at all relevant times the Defendants knew that it was true that World Mission New Jersey takes large sums of money from its members.

338. Specifically, the Defendants knew that World Mission New Jersey teaches its members not to value material wealth or possessions.

339. The Defendants knew that World Mission New Jersey pressures its members to repeatedly donate large sums to World Mission New Jersey, even when the members cannot reasonably afford to make such donations.

340. The Defendants also knew that as a result of such teachings and practices, many World Mission New Jersey members had suffered severe financial consequences.

341. In fact, the Defendants knew that as a result of such teachings and practices, many World Mission New Jersey members were living in poverty or poverty-like conditions, often rooming together in confined spaces and sharing meals to save money.

B. Business Review Site Statements Were Not False

342. In ¶¶ 38 and 39 of the Virginia Complaint, in ¶¶ 41 and 42 of the New Jersey Complaint, in ¶ 30(a) of the FAC, and in ¶ 30(a) of the SAC, the Defendants alleged that the Plaintiff had posted defamatory reviews of World Mission New Jersey on Local.com. According to the Defendants, the Plaintiff stated that World Mission New Jersey is a "religious cult" that "destroy[s] families!!!" and that World Mission New Jersey "will destroy your family and take all of your money."

343. As explained above, the Defendants knew at all relevant times that they would not

be able to prove the falsity of the statements asserting that World Mission New Jersey destroys families and takes the members' money.

344. The Defendants also knew that, to the extent it is a factual statement and not a protected opinion, they would not be able to prove the falsity of the "religious cult" statement.

345. Specifically, the Defendants knew that World Mission New Jersey has many of the characteristics that are commonly associated with cults, such as, but not limited to:

- 1) absolute authority placed in a single human being (Defendant Zahng);
- 2) prohibition or discouraging of questioning, doubt, and dissent;
- 3) mind-altering practices (such as meditation, chanting, and/or debilitating work routines);
- 4) demands by the leadership as to how members should think, act, and feel;
- 5) an elitist attitude, where the group claims a special, exalted status for itself, its leaders, and its members;
- 6) a polarizing us-versus-them mentality, which causes conflict with the wider society;
- 7) lack of accountability for the leadership;
- 8) an ends justifies the means philosophy;
- 9) feelings of shame and/or guilt induced by the group in order to influence and/or control members;
- 10) subservience to the leader or group causing members to cut ties with family and friends;

- 11) subservience to the leader or group causing members to radically alter the personal goals and activities they had before joining the group;
- 12) preoccupation with bringing in new members;
- 13) preoccupation with making money;
- 14) requirement or expectation that members devote inordinate amounts of time to the group and group-related activities;
- 15) encouragement of members to live and/or socialize only with other group members; and
- 16) use of fear to make members afraid of reprisals to themselves or others if they leave, or even consider leaving, the group.

346. In ¶ 41 of the Virginia Complaint, in ¶ 44 of the New Jersey Complaint, in ¶ 30(b) of the FAC, and in ¶ 30(b) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.yellowbot.com, saying that the Plaintiff is a "religious cult" that "wil [sic]⁴ destroy your family and take all of your money," that World Mission New Jersey constitutes "Religious Fraud," and that "[m]any have had their marriages and families torn apart by this destructive mind control group."

347. As explained above, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statements asserting that World Mission New Jersey destroys families and marriages, takes the members' money, and is a religious cult.

348. For the same reasons explained above, the Defendants also necessarily knew that they could not prove the falsity of the statements asserting that World Mission

⁴ Typographical error comes from the original challenged statement as posted.

New Jersey is a "destructive mind control group" which constitutes a "Religious Fraud."

349. In ¶ 42 of the Virginia Complaint, and in ¶ 45 of the New Jersey Complaint, the Defendants alleged that the Plaintiff published false and defamatory statements that the Plaintiff is a "religious cult" that "will destroy your family and take all of your money!!!" to the website www.meriden.patch.com.
350. As explained above, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statements asserting that World Mission New Jersey is a religious cult, destroys families, and takes the members' money.
351. In ¶ 43 of the Virginia Complaint, in ¶ 46 of the New Jersey Complaint, in ¶ 30(c) of the FAC, and in ¶ 30(c) of the SAC, the Defendants alleged that the Plaintiff posted statements on www.santee.patch.com or patch.com saying that World Mission New Jersey is a "religious cult" that "will destroy your family and take all of your money!!!" and that World Mission New Jersey "destroy[s] families!"
352. As explained above, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statements asserting that World Mission New Jersey is a religious cult, destroys families, and takes the members' money.
353. In ¶ 44 of the Virginia Complaint, in ¶ 47 of the New Jersey Complaint, in ¶ 30(d) of the FAC, and in ¶ 30(d) of the SAC, the Defendants alleged that the Plaintiff posted statements on the website www.findlocal.latimes.com saying 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.

354. Yet, at all relevant times the Defendants knew that they could not prove the falsity of these statements.
355. Specifically, the Defendants knew that World Mission New Jersey employs a policy or practice of telling "righteous lies."
356. A "righteous lie" is a lie that is told to protect the World Mission Enterprise, or any of its constituent entities or leaders, or to advance the agenda of same. The Defendants believe that it is not immoral to lie in such circumstances.
357. The Defendants knew that, as a result of World Mission New Jersey's policy or practice of using "righteous lies," World Mission New Jersey purposefully withholds information from new recruits that, if disclosed, would likely cause the recruit to not want to join World Mission New Jersey.
358. The Defendants also knew that World Mission New Jersey teaches its members that if they disclose information about the World Mission Enterprise to new recruits before the new recruit is ready to hear it, the new recruit can suffer spiritual damage.
359. For instance, the Defendants knew that World Mission New Jersey generally does not disclose to new recruits that it considers Defendant Zahng to be the "Mother God" until after the recruit has been involved with World Mission New Jersey for a few months.
360. The Defendants understand that if they disclosed Defendant Zahng's status as the "Mother God" to a new recruit too early, the new recruit would likely decide not to join or remain in World Mission New Jersey.

361. The Defendants also knew that World Mission New Jersey recruiters often use deception to induce people they have targeted for recruitment into listening to a recruitment pitch that the target might otherwise choose not to listen to.
362. Thus, the Defendants necessarily had to know that they could not prove the falsity of the statements stating that World Mission New Jersey uses deception when recruiting or getting people to listen to them.
363. In ¶ 45 of the Virginia Complaint, in ¶ 48 of the New Jersey Complaint, in ¶ 30(e) of the FAC, and in ¶ 30(e) of the SAC, the Defendants alleged that the Plaintiff published the statement that World Mission New Jersey "destroy[s] families" on the website www.aidpage.com.
364. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of this statement.
365. In ¶ 45 of the Virginia Complaint, in ¶ 48 of the New Jersey Complaint, in ¶ 30(f) of the FAC, and in ¶ 30(f) of the SAC, the Defendants alleged that the Plaintiff published the statement that World Mission New Jersey is a "religious cult" that "destroy[s] families" on the website www.kudzu.com.
366. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of this statement.
367. In ¶ 46 of the Virginia Complaint, in ¶ 49 of the New Jersey Complaint, in ¶ 30(g) of the FAC, and ¶ 30(g) of the SAC, the Defendants alleged that the Plaintiff posted statements on the website www.socialcurrent.org saying that World Mission New Jersey is a "religious cult" that "destroy[s] families and rob[s] people of their money".

368. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of these statements.
369. In ¶ 47 of the Virginia Complaint, in ¶ 50 of the New Jersey Complaint, in ¶ 30(h) of the FAC, and in ¶ 30(h) of the SAC, the Defendants alleged that the Plaintiff posted statements on the website www.chamberofcommerce.com saying that World Mission New Jersey is a "religious cult" that "wil [sic]⁵ destroy your family and take all of your money".
370. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of these statements.
371. In ¶ 47 of the Virginia Complaint, in ¶ 50 of the New Jersey Complaint, in ¶ 30(h) of the FAC, and in ¶ 30(h) of the SAC, the Defendants alleged that the Plaintiff posted statements on the website www.dexknows.com saying that World Mission New Jersey is a "religious cult" that "wil [sic]⁶ destroy your family and take all of your money".
372. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of these statements.
373. In ¶ 48 of the Virginia Complaint, in ¶ 51 of the New Jersey Complaint, in ¶ 30(i) of the FAC, and in ¶ 30(i) of the SAC, the Defendants alleged that the Plaintiff posted statements on the website www.maps.google.com referring to World Mission New Jersey by saying the "so called church is a cult" that "will tear apart your marriage and your family," and saying that World Mission New Jersey "brainwash[es] members in order to take all of their money from them."

⁵ Typographical error comes from the original challenged statement as posted.

⁶ Typographical error comes from the original challenged statement as posted.

374. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of these statements.

C. Ross Site Statements Were Not False

375. In ¶ 53 of the Virginia Complaint, and in ¶ 56 of the New Jersey Complaint, the Defendants alleged that the Plaintiff posted statements on the Ross Site in which she directed readers to the Destroys Families Video and claimed that the video "explains how the World Mission Society Church of God destroys families."

376. As explained above, the Defendants knew at all relevant times that they could not prove the falsity of the statements saying that World Mission New Jersey destroys families.

377. Also in ¶ 53 of the Virginia Complaint, and in ¶ 56 of the New Jersey Complaint, the Defendants alleged that the Plaintiff posted statements on the Ross Site in which she directed readers to the Financial Info Video and claimed that the video discusses alleged "connections between the World Mission Society Church of God and Big Shine Worldwide[,] Inc.

378. As explained below, the Defendants knew at all relevant times that they could not prove the falsity of the statements discussing connections between World Mission and Big Shine.

379. In ¶ 54 of the Virginia Complaint, in ¶ 57 of the New Jersey Complaint, in ¶ 36 of the FAC, and in ¶ 36 of the SAC, the Defendants alleged that the Plaintiff posted statements on the Ross Site in which she accused the Plaintiff of being "a destructive mind control cult".

380. As explained above, the Defendants knew at all relevant times that they could not

prove the falsity of this statement.

381. In ¶ 55 of the Virginia Complaint, and in ¶ 58 of the New Jersey Complaint, the Defendants alleged that the Plaintiff falsely implied that World Mission New Jersey lies to the IRS about its connections to Big Shine and other branches of World Mission.
382. In ¶ 56 of the Virginia Complaint, and in ¶ 59 of the New Jersey Complaint, the Defendants alleged that the Plaintiff suggested an inappropriate financial relationship exists between World Mission New Jersey 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. The Plaintiff allegedly asked "Why such a strong connection to a [sic]⁷ Big Shine Worldwide?"
383. In ¶ 57 of the Virginia Complaint, and in ¶ 60 of the New Jersey Complaint, the Defendants alleged that the Plaintiff's "statements imply that [World Mission New Jersey] 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.'"
384. Yet, the Defendants knew at all relevant times that they could not prove the falsity of these statements.
385. When the Defendants described the challenged statements regarding Big Shine in

⁷ Grammatical error comes from the original challenged statement as posted.

their various Complaints, they edited the statements so as to remove the complete context and factual support supplied by the author.

386. When viewing the unedited version of the challenged statements regarding Big Shine, it is clear that the author provided truthful factual support to back up the challenged statements.
387. Specifically, the author cited to various government documents filed by World Mission entities and Big Shine entities showing that there was overlap in personnel between the two organizations.
388. Specifically, the author pointed out that Big Shine is owned by Defendant Lee, who is also the pastor of World Mission New Jersey.
389. The author also pointed out that the secretary of Big Shine was Jae Hoon Lee, who was also the pastor of a World Mission entity in Illinois.
390. Moreover, the author listed a number of locations around the world where both World Mission and Big Shine have a presence.
391. Because the author's factual support was included in the same posts containing the challenged statements, the Defendants knew that the factual support had been provided by the author.
392. Moreover, the Defendants knew that the factual support was true, because the factual support was derived from documents filed with the government by World Mission and Big Shine.
393. Thus, the Defendants knew that the challenged statements regarding a connection between World Mission and Big Shine could not be proven false.
394. In ¶ 58 of the Virginia Complaint, in ¶ 61 and ¶ 127 of the New Jersey Complaint,

in ¶ 33 of the FAC, and in ¶ 33 of the SAC, of the New Jersey Complaint, the Defendants alleged that the Plaintiff posted a statement on the Ross Site in which she stated that World Mission New Jersey lies about how the church was founded on its application for tax exemption status.

395. The Defendants knew at all relevant times that they could not prove the falsity of this statement.

396. Specifically, the Defendants knew that the challenged statement referred to the tax exemption application filed by the World Mission entity in California, not by World Mission New Jersey.

397. Moreover, the Defendants knew that the tax exemption application in question failed to disclose key details about the California World Mission entity's founding.

398. For instance, the tax exemption application stated that the California World Mission entity was founded by Defendant Kim in or about 1998 as a result of a divine revelation from God.

399. Yet, the tax exemption application failed to disclose the fact that the California World Mission entity was founded as a subsidiary of its parent headquarters, World Mission South Korea, which was founded in 1964 by a Korean man named Ahn Sahng Hong, who claimed to be the Second Coming of Christ.

400. The author had disclosed these facts in the original challenged statement, and the Defendants knew that those facts were true.

401. Thus, the Defendants knew that the statement could not be proven false.

402. In ¶ 59 of the Virginia Complaint, and in ¶ 62 of the New Jersey Complaint, the

Defendants alleged that the Plaintiff posted a statement in which she stated that World Mission New Jersey "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.

403. In ¶ 34 of the FAC, and in ¶ 34 of the SAC, the Defendants alleged that the Plaintiff posted the following statement on the Ross Site:

"Does the organization control or is it controlled by any other organization?". The WMSCOG checked off "NO". The WMSCOG locations are NOT independent and are all controlled by the main location in Seoul, S. Korea. Why would they answer "NO" to this question?

404. In ¶ 35 of the FAC, and in ¶ 35 of the SAC, the Defendants asserted that World Mission New Jersey:

is not "controlled by the main location in Seoul S. Korea."
It is an independent entity, legally and functionally.

405. Yet, the Defendants knew at all relevant times that World Mission New Jersey was controlled by World Mission South Korea, and thus they knew that they could not prove the falsity of the statements in ¶ 34 of the FAC and in ¶ 34 of the SAC.

406. With respect to the statement asserting that World Mission entities are "controlled by the main location" in South Korea, the Defendants knew that World Mission New Jersey had no meaningful independence from Defendant World Mission South Korea.

407. For instance, the Defendants knew that the beliefs, practices, policies, and procedures of World Mission New Jersey were set forth by World Mission South Korea.

408. The Defendants knew that Defendant Lee was hired as World Mission New Jersey's pastor by World Mission South Korea, and that only World Mission South Korea had the power to fire him.
409. The Defendants knew that World Mission New Jersey had no freedom to hire or fire any of its officers without approval of World Mission South Korea.
410. The Defendants knew that the money raised by World Mission New Jersey actually belonged to World Mission South Korea, and that almost all of the money raised by World Mission New Jersey was sent to World Mission South Korea, with World Mission New Jersey being allowed to keep an allowance to cover its operating expenses.
411. Furthermore, the Defendants knew that the decision to bring the Virginia Case and the New Jersey Case was made by World Mission South Korea, and that World Mission New Jersey had no authority to bring the two lawsuits without permission from World Mission South Korea.
412. With respect to the statement stating that World Mission New Jersey "denies that [it] ha[s] any relationship to another organization despite having a clear connection to the WMSCOG in California," the Defendants edited the statement so as to remove the complete context and factual support supplied by the author.
413. When viewing the unedited version of the challenged statement, it is clear that the author was referring to a connection between the World Mission entity in Illinois and the World Mission entity in California.
414. It is also clear that the author provided truthful factual support for the assertion that there is a connection between the World Mission entity in Illinois and the

World Mission entity in California, by citing to government documents filed by each of the two entities showing an overlap in personnel.

415. In ¶ 60 of the Virginia Complaint, and in ¶ 63 of the New Jersey Complaint, the Defendants alleged that the Plaintiff posted a statement in which she stated that "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 the Plaintiff is lying to and misrepresenting its corporate status to the IRS."
416. In fact, the challenged statement does not state that 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.
417. Rather, the challenged statement poses the following question: "Is this an attempt to minimize the appearance of their growth and remain under the IRS's radar?"
418. The Defendants knew at all relevant times that the Plaintiff had merely posed a question, and had not made a statement of fact.
419. Nevertheless, the Defendants knowingly edited the question to make it appear like a statement of fact in order to deceive the court into thinking that the statement could form the basis of a defamation claim.
420. Moreover, the Defendants knew at all relevant times that the fact underlying the question – the fact that different branches of World Mission report separately to the IRS – is true. In fact, pages from the IRS filings from different World Mission entities proving this point were posted online alongside the challenged statements.

D. Five-Part Story Statements Were Not False

421. In ¶¶ 66 - 84 of the Virginia Complaint, in ¶¶ 72-87 of the New Jersey Complaint, in ¶¶ 38-48 of the FAC, and in ¶¶ 38-48 of the SAC, the Defendants alleged that the Plaintiff defamed World Mission New Jersey by posting the Five-Part Story to the Examining Website.
422. In ¶ 71 of the Virginia Complaint, and in ¶ 74 of the New Jersey Complaint, the Defendants alleged that the Five-Part Story "purports to tell of [the Plaintiff]'s recruitment to and her exit from [World Mission New Jersey]."
423. In ¶ 72 of the Virginia Complaint, and in ¶ 75 of the New Jersey Complaint, the Defendants alleged that the Plaintiff stated in the Five-Part Story that World Mission New Jersey sought to break up her marriage. Specifically, the Defendants alleged that the Plaintiff stated that World Mission New Jersey "blatant[ly] attempt[ed] to cannibalize all of [her] husband' s time in order to keep him away from [her]"and that "involvement [with [World Mission New Jersey]] continued to turn [her] husband against [her]." The Defendants further alleged that "In relating how she gave her husband an ultimatum concerning their marriage [the Plaintiff] said she told him, '[i]t was the cult or me.'"
424. In ¶ 73 of the Virginia Complaint, and in ¶ 76 of the New Jersey Complaint, the Defendants alleged that the Plaintiff claimed in the Five-Part Story World Mission New Jersey "destroyed her marriage" and that World Mission New Jersey is a "destructive organization."
425. In ¶ 74 of the Virginia Complaint, and in ¶ 77 of the New Jersey Complaint, the Defendants alleged that the Plaintiff had falsely implied that World Mission New

Jersey is a cult that destroys families, and that the Plaintiff allegedly did this by publishing in the Five-Part Story what the Plaintiff learned "[d]uring [her] research on the World Mission Society Church of God."

426. In ¶ 75 of the Virginia Complaint, and in ¶ 78 of the New Jersey Complaint, the Defendants alleged that the Plaintiff stated in the Five-Part Story that "an obvious pattern emerged" as the Plaintiff "read story after story [from former World Mission members] about how the WMSCOG had either ruined their marriage or family." The Defendants further alleged that "With respect to her own marriage, [the Plaintiff] claimed, '[T]he WMSCOG was driving [her husband] crazy.'"

427. In ¶ 76 of the Virginia Complaint, and in ¶ 79 of the New Jersey Complaint, the Defendants alleged that the Plaintiff falsely implied in the Five-Part Story that the Plaintiff is a cult that uses mind control tactics and sleep deprivation to control its members. The Defendants further alleged that the Plaintiff claimed her husband was called to engage in religious training with World Mission New Jersey but that "[t]he goal of this training sounded unrealistic and seemed like a ploy to set members up to fail."

428. In ¶ 77 of the Virginia Complaint, and in ¶ 80 of the New Jersey Complaint, the Defendants alleged that, in the Five-Part Story, the Plaintiff "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?'"

429. In ¶ 78 of the Virginia Complaint, and in ¶ 81 of the New Jersey Complaint, the Defendants alleged that, in the Five-Part Story, the Plaintiff "further stated that '[t]he WMSCOG was keeping . . . both [[the Plaintiff] and her husband] sleep deprived' because her husband would stay up late to study religious teachings and would wake up early to pray."
430. In ¶ 79 of the Virginia Complaint, and in ¶ 82 of the New Jersey Complaint, the Defendants alleged that, in the Five-Part Story, the Plaintiff "further supported the false and defamatory implication that [World Mission New Jersey] is a cult by publishing [the Plaintiff]'s alleged research about [World Mission New Jersey] on the Examining Website."
431. In ¶ 80 of the Virginia Complaint, and in ¶ 83 of the New Jersey Complaint, the Defendants alleged that, in the Five-Part Story, the Plaintiff "published '[t]he most disturbing information that [[the Plaintiff]] 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.'" The Defendants further alleged that the Plaintiff "stated that she 'could not ignore the similarities to what she had experienced in the WMSCOG.'"
432. In ¶ 81 of the Virginia Complaint, and in ¶ 84 of the New Jersey Complaint, the Defendants alleged that "Together, these statements impart the false and defamatory inferences that the Plaintiff is a destructive organization that tears families apart and uses militaristic mind control and sleep deprivation tactics to control its members."

433. Yet, as explained above and below, the Defendants knew at all relevant times that they would not be able to prove the falsity of any of these statements.
434. In fact, everything that the Plaintiff said in the Five-Part Story was either a fact that the Defendants knew to be true, or a protected opinion based on a fact that the Defendants knew to be true.
435. In ¶ 39 of the FAC, and in ¶ 39 of the SAC, the Defendants alleged that the Plaintiff stated in the Five-Part Story that "I noticed that married couples and families did not study together unless there was a longer study being offered on a Sunday afternoon."
436. In those same paragraphs, the Defendants went on to explain that the challenged statement was false, and that the Plaintiff "could never have noticed that married couples and families 'did not study together unless there was a longer study being offered' because couples frequently study together, and often studied together in the presence of [the Plaintiff]."
437. The Defendants even asserted, rather brazenly, that "The statement implies that [World Mission New Jersey] separates families when it does not."
438. Yet, the Defendants knew at all relevant times that, in fact, World Mission New Jersey does separate families.
439. Specifically, the Defendants knew that World Mission New Jersey actually adheres to a strictly enforced policy of segregating the men and women during study sessions and worship services.
440. In ¶ 40 of the FAC, and in ¶ 40 of the SAC, the Defendants claimed that the Plaintiff stated in the Five-Part Story that "Members . . . would attend an

approximately six-hour long group study."

441. In those same paragraphs, the Defendants went on to explain that the statement is false because group study never lasts for more than one hour at a time.
442. Yet, the Defendants knew at all relevant times that World Mission group studies frequently last more than one hour, and sometimes last as long as six hours.
443. Thus, the Defendants knew they were lying when they alleged that group study never lasts for more than one hour at a time, and they knew that they could not prove the falsity of the Plaintiff's statement.
444. In ¶ 41 of the FAC, and in ¶ 41 of the SAC, the Defendants claimed that in the Five-Part Story the Plaintiff "stated that the Church, during its recruiting efforts was 'targeting people in their 20s and 30s since we never approached anyone that appeared to be older than that.'"
445. In those same paragraphs, the Defendants went on to explain that World Mission New Jersey "does not target people in their 20s and 30s and frequently approaches people of all ages when it evangelizes."
446. Yet, the Defendants willfully edited the statement to change its meaning.
447. In the original unedited statement, it is clear that the Plaintiff was discussing the target age of the recruiting group that the Plaintiff was in, not the target age of World Mission New Jersey as a whole.
448. Moreover, the Defendants knew that when the Plaintiff was a member of World Mission New Jersey, she was used primarily to recruit other young people.
449. Thus, the Defendants knew at all relevant times that they could not prove the falsity of the statement.

450. In ¶ 42 of the FAC, and in ¶ 42 of the SAC, the Defendants claimed that the Plaintiff stated in the Five-Part Story that Mr. Ortiz "was in his second day of a three day fast . . . fasting means no food or water . . . participation in the fast is expected from all members, including children and infants."
451. In those same paragraphs, the Defendants went on to explain that World Mission New Jersey "does not require or expect fasting from any member, and fasting is specifically prohibited from children and infants for myriad reasons, especially health reasons."
452. Yet, the Defendants knew at all relevant times that all members of World Mission New Jersey are expected to participate in the fasting.
453. Moreover, the Defendants knew that World Mission New Jersey members who refuse to fast are subjected to intense social pressure to conform to the fasting practices.
454. The Defendants also knew that the Plaintiff had been instructed by her World Mission New Jersey group leader that children and infants are expected to participate in the fast.
455. Thus, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statement regarding fasting.
456. In ¶ 43 of the FAC, and in ¶ 43 of the SAC, the Defendants alleged that the Plaintiff asked in the Five-Part Story "why are there so many divorced or separated members?"
457. In those same paragraphs, the Defendants went on to explain that "This question implies false facts, namely that there are 'so many' divorced or separated

members."

458. Yet, the Defendants knew that the full context of the challenged statement was as follows:

I remember asking the pastor why members in the WMSCOG had separated from their non-believing spouses. After all, the girl who recruited me had just left her husband because he decided to stop attending the church. I pointed out how in 1 Corinthians 7, the apostle Paul states that married members of the church should not separate from their non-believing spouses. The pastor explained that the church does not encourage divorce, but instead encourages married couples to stay together. So again I asked, if this is true then why are there so many divorced or separated members? He explained that the members had no choice but to leave their spouses because of the persecution they received. He went on to explain that the non-believing spouses usually had a problem with how much time the member spent in the church and usually would end up trying to make the member choose between the church and the marriage. The deaconess sitting to my right went on to explain that she divorced her husband due to similar circumstances and that her husband had also committed adultery. It is important to point out that she had never once mentioned that her husband had committed adultery to me before. The other times that she had discussed leaving her husband with me, her reasons were that he had tried to stop her from tithing and attending the church as often. I thought, how convenient.

459. In other words, the Defendants knew at all relevant times that the Plaintiff had supported the challenged question with a series of facts and a conversation with Defendant Lee, the truth of which was never challenged by the Defendants at any point during the litigation.

460. Thus, the Defendants knew at all relevant times that they could not prove the falsity of the challenged question.

461. In ¶ 44 of the FAC, and in ¶ 44 of the SAC, the Defendants alleged that the

Plaintiff stated in the Five-Part Story that her "research had uncovered that 'the WMSCOG was said to have been using the same mind control tactics used on US prisoners of war in N. Korea,'" and that she "'could not ignore the similarities to what she had experienced in the WMSCOG.'"

462. The Defendants then went on to explain that World Mission New Jersey does not use North Korean-style mind control techniques.

463. Yet, once again, the Defendants edited the challenged statement to change its meaning. The actual quote is as follows:

This lead me to do a google search on the WMSCOG. To my surprise, I found a website that claimed that the WMSCOG was a cult! [The site is no longer online]. My anxiety levels continued to increase as I sat reading information about the contradictions in the WMSCOG doctrine, questionable practices, and former members' stories about how they had been hurt by the WMSCOG. The most disturbing information that I had come across was that the WMSCOG was said to have been using the same mind control tactics used on US prisoners of war in N. Korea. I also learned about Robert J. Lifton's thought reform model [more on this]. When I finally read an article that explained how the Jehovah's Witnesses used the same tactics to control their members I could not ignore the similarities to what I had experienced in the WMSCOG.

464. In other words, the Plaintiff never said that World Mission New Jersey used North Korean-style mind control techniques.

465. Rather, the Plaintiff had found other people who were saying that World Mission New Jersey used North Korean-style mind control techniques.

466. The Plaintiff was not repeating that information to assert that it was true, but only to explain the thought process she experienced as she was researching information about World Mission New Jersey.

467. It was only after reading about the mind control techniques described by Robert J. Lifton, a famous psychiatrist, and then reading about the Jehovah's Witnesses, that the Plaintiff recognized that World Mission New Jersey was using the same control tactics described by Lifton and used by the Jehovah's Witnesses, which are not necessarily the same tactics used by North Korea.
468. Although the Defendants denied that World Mission New Jersey uses the same tactics as North Korea, they never denied – at any time during the litigation – that World Mission New Jersey uses the same tactics described by Lifton, or the same tactics used by the Jehovah's Witnesses.
469. This is significant, because North Korea uses imprisonment and physical violence to control people, whereas the Jehovah's Witnesses and World Mission New Jersey use a less violent program of psychological coercion, as described by Lifton.
470. The Defendants had access to the original article written by the Plaintiff and knew what the Plaintiff had actually said.
471. Yet, the Defendants willfully edited the Plaintiff's comments in the FAC and in the SAC in order to make it appear that the Plaintiff was referring to North Korean mind control tactics rather than Lifton's tactics or the Jehovah's Witnesses' tactics.
472. On information and belief, the reason the Defendants did this is because they thought they might be able to prove the falsity of an accusation that World Mission New Jersey used North Korean-style imprisonment and violence.
473. However, the Defendants knew at all relevant times that they could not prove the

falsity of an accusation that World Mission New Jersey used non-violent psychological coercion, such as that used by the Jehovah's Witnesses, and described by Lifton.

474. In ¶ 45 of the FAC, and in ¶ 45 of the SAC, the Defendants alleged that the Plaintiff stated in the Five-Part Story that Mr. Ortiz "informs me that he had been recently chosen to participate in an intense Bible study training course where he would learn to teach 30 subjects in 30 days."

475. The Defendants went on to explain that Mr. Ortiz "was never chosen to participate in the program at issue. On the contrary, he volunteered."

476. Yet, the Defendants knew at all relevant times that Mr. Ortiz had no desire to enter into the program at issue until Defendant Lee recruited him for it, and that Defendant Lee did so after forming his plan to break up the marriage between the Plaintiff and Mr. Ortiz.

477. In other words, the Defendants knew that Defendant Lee was using the program as a pretext to keep Mr. Ortiz away from the Plaintiff.

478. In fact, Defendant Lee had discussed strategies with other World Mission New Jersey members for keeping the Plaintiff and Mr. Ortiz apart, and the 30-day course was part of that strategy.

479. Thus, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statement regarding the 30-day course.

480. In ¶ 46 of the FAC, and in ¶ 46 of the SAC, the Defendants claimed that the Plaintiff stated in the Five-Part Story that World Mission New Jersey is a "cult." They further claimed that the Plaintiff said she gave Mr. Ortiz an ultimatum:

"either the cult or me."

481. As explained above, the Defendants knew that they could not prove the falsity of these statements.

482. In ¶ 47 of the FAC, and in ¶ 47 of the SAC, the Defendants claimed that the Plaintiff stated in the Five-Part Story that World Mission New Jersey "destroyed her marriage" and that World Mission New Jersey is a "destructive organization."

483. As explained above, the Defendants knew that they could not prove the falsity of these statements.

484. In ¶ 48 of the FAC, and in ¶ 48 of the SAC, the Defendants claimed that the Plaintiff concluded in the Five-Part Story, based on the foregoing statements, that World Mission New Jersey's "intention was to cause division between my husband and I."

485. In those same paragraphs, the Defendants went on to explain that this statement was false.

486. Yet, the Defendants knew at all relevant times that they could not prove the falsity of that statement, because they knew that Defendant Lee had devised a plan to break up the Plaintiff and Mr. Ortiz, they knew that Defendant Lee had discussed the plan with other World Mission members, and they knew that Defendant Lee had assigned handlers to Mr. Ortiz to make sure that he divorced the Plaintiff.

E. YouTube Video Statements Were Not False

487. In ¶ 99 of the Virginia Complaint, in ¶ 102 of the New Jersey Complaint, in ¶¶ 53-58 of the FAC, and in ¶¶ 53-58 of the SAC, the Defendants alleged that the Plaintiff posted the Destroys Families Video.

488. In ¶ 99(a) of the Virginia Complaint, in ¶ 102(a) of the New Jersey Complaint, in ¶ 54 of the FAC, and in ¶ 54 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses mind control tactics on its members in order to tear them apart from their families."
489. As explained above, the Defendants knew at all relevant times that they would not be able to prove the falsity of this statement.
490. In ¶ 99(b) of the Virginia Complaint, and in ¶ 102(b) of the New Jersey Complaint, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses fear and guilt as their main tactics."
491. Yet, the Defendants knew at all relevant times that World Mission New Jersey instills fear in its members in a variety of ways.
492. For instance, the Defendants knew that World Mission New Jersey teaches its members that the world is coming to an end, and that compliance with World Mission's demands is the only way to be saved when the world ends.
493. The Defendants also knew that World Mission New Jersey teaches its members that bad things will happen to them and their families if they ever leave, or think about leaving, World Mission.
494. The Defendants also knew at all relevant times that World Mission New Jersey instills guilt in its members in a variety of ways.
495. For instance, the Defendants knew that World Mission New Jersey teaches its members that each member is responsible for reinforcing the faith in the other

members, and that if a member fails to show full dedication to World Mission New Jersey, that member will be letting the other members down.

496. Thus, the Defendants knew at all relevant times that they could not prove the falsity of the statement saying that "The World Mission Society Church of God uses fear and guilt as their main tactics."

497. In ¶ 99(c) of the Virginia Complaint, in ¶ 102(c) of the New Jersey Complaint, in ¶ 55 of the FAC, and in ¶ 55 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses fear to prevent its members from going on vacation."

498. Yet, the Defendants knew at all relevant times that World Mission New Jersey teaches its members that they must be present at World Mission New Jersey's premises in order to get into Heaven when the world ends.

499. The Defendants also knew that because World Mission New Jersey teaches its members that the world can end any day now, members are made to believe that if they leave for vacation, they might miss their chance to get into Heaven.

500. Thus, the Defendants knew at all relevant times that they could not prove the falsity of the statement saying that "The World Mission Society Church of God uses fear to prevent its members from going on vacation."

501. In ¶ 99(d) of the Virginia Complaint, in ¶ 102(d) of the New Jersey Complaint, in ¶ 56 of the FAC, and in ¶ 56 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process."

502. Yet, the Defendants knew at all relevant times that World Mission New Jersey schedules activities for its members from the early morning hours until late at night, thus resulting in members often becoming exhausted and sleep deprived.
503. The Defendants also knew that World Mission New Jersey teaches its members that sleep is less important than devotion to World Mission, which causes World Mission members to believe that lack of sleep is a sign of a commitment and devotion to World Mission.
504. Thus, the Defendants knew at all relevant times that they could not prove the falsity of the statement saying that "The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process."
505. In ¶ 99(e) of the Virginia Complaint, in ¶ 102(e) of the New Jersey Complaint, in ¶ 57 of the FAC, and in ¶ 57 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "Every waking moment must be focused on controlling the member's mind."
506. Yet, the Defendants knew at all relevant times that World Mission New Jersey provides activities and assignments for its members to engage in throughout the day, thus causing the members' minds to be preoccupied with World Mission even when they are not physically present at World Mission New Jersey's premises.
507. Thus, the Defendants knew that they could not prove the falsity of the statement saying that "Every waking moment must be focused on controlling the member's mind."
508. In ¶ 101 of the Virginia Complaint, in ¶ 104 of the New Jersey Complaint, in ¶ 59

of the FAC, and in ¶ 59 of the SAC, the Defendants alleged that the Plaintiff posted the Financial Info Video to YouTube.

509. In ¶ 103 of the Virginia Complaint, in ¶ 106 of the New Jersey Complaint, in ¶ 60 of the FAC, and in ¶ 60 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that World Mission New Jersey "does not provide any form of financial disclosure to its members." Then the Plaintiff allegedly asked, "So where does the money go?"
510. The Defendants knew at all relevant times that they would not be able to prove the falsity of these statements.
511. Specifically, the Defendants knew that World Mission New Jersey does not provide any accountings or other financial disclosures to its members.
512. In ¶ 104 of the Virginia Complaint, in ¶ 107 of the New Jersey Complaint, in ¶ 60 of the FAC, and in ¶ 60 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that World Mission New Jersey denies to the IRS that "the organization has a direct business relationship through ownership of another entity."
513. The Defendants knew at all relevant times that they would not be able to prove the falsity of this statement.
514. Specifically, the Defendants knew that the Plaintiff was referencing information she found in an IRS filing made by the World Mission entity in Bloomingdale, Illinois, not in an IRS filing made by World Mission New Jersey.
515. In ¶ 105 of the Virginia Complaint, and in ¶ 108 of the New Jersey Complaint, the Defendants alleged that in the Financial Info Video, the Plaintiff said "This is

where it gets interesting, folks," as she claimed that World Mission New Jersey's pastor and registered agent, Defendant Lee, owns Big Shine and that the pastor of another branch of the Church, Jae Hoon Lee, is the Secretary of Big Shine, which the Plaintiff allegedly claimed "is a clear business relationship."

516. In ¶ 60 of the FAC, and in ¶ 60 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that World Mission New Jersey's relationship with Big Shine "is a clear business relationship" which is "quite suspect."

517. Yet, the Defendants knew that the underlying facts that the Plaintiff was relying on when forming the opinion that there "is a clear business relationship" which is "quite suspect," were all true.

518. For instance, the Defendants knew that Defendant Lee was the pastor of World Mission New Jersey and also the owner of Big Shine.

519. The Defendants also knew that Jae Hoon Lee was the pastor of an Illinois branch of World Mission and also the secretary of Big Shine.

520. Thus, the Defendants knew at all relevant times that they would not be able to prove the falsity of the statements saying that there "is a clear business relationship" between World Mission and Big Shine which is "quite suspect."

521. In ¶ 106 of the Virginia Complaint, and in ¶ 109 of the New Jersey Complaint, the Defendants alleged that in the Financial Info Video, the Plaintiff said "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."

522. The Defendants knew at all relevant times that they would not be able to prove the falsity of this statement.
523. After all, the Defendants knew from reading the statement that the author was making an assumption, not a statement of fact.
524. Moreover, the Defendants knew that the facts upon which the author's assumption was based – that Jae Hoon Lee was the secretary of Big Shine, and that Big Shine was owned by Defendant Lee – were true.
525. In ¶ 107 of the Virginia Complaint, and in ¶ 110 of the New Jersey Complaint, the Defendants alleged that in the Financial Info Video, the Plaintiff stated 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."
526. The Defendants knew at all relevant times that they would not be able to prove the falsity of the statements describing the locations that Big Shine does business in and comparing them to the locations where World Mission operates, because the locations did in fact overlap, as described.
527. In ¶ 113 of the Virginia Complaint, in ¶ 116 of the New Jersey Complaint, in ¶ 62 of the FAC, and in ¶ 62 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff stated that she was reading an IRS filing from one of the Church's branches and noted that the form reports receipt of "a little over \$26,000

from a, quote, parental church," while stating that this is suspect because the form did not also report a corporate subsidiary relationship to its parent church headquartered in South Korea.

528. In ¶ 114 of the Virginia Complaint, in ¶ 117 of the New Jersey Complaint, in ¶ 63 of the FAC, and in ¶ 63 of the SAC, the Defendants asserted that those statements were false because World Mission New Jersey is not a corporate subsidiary of a parent Church.

529. Yet, the Defendants knew at all relevant times that they would not be able to prove the falsity of those statements.

530. Specifically, the Defendants knew that the IRS form from which the Plaintiff was reading was filed by a World Mission entity in Illinois, not by World Mission New Jersey.

531. The Defendants also knew that the form in question did in fact report receipt of "a little over \$26,000 from a, quote, parental church."

532. The Defendants also knew that the form failed to report that the Illinois World Mission entity being discussed had a corporate subsidiary relationship to its parent Church headquartered in South Korea, even though the same form claimed that the World Mission entity in Illinois received money from its "parental church," and even though, as explained above, the parental church in South Korea asserted near-total control over each of the World Mission entities around the world.

533. In ¶ 116 of the Virginia Complaint, in ¶ 119 of the New Jersey Complaint, in ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants alleged that, in the Financial

Info Video, the Plaintiff stated that a World Mission branch (unidentified in the Virginia Complaint and New Jersey Complaint, but identified in the FAC and the SAC as World Mission New Jersey) had claimed "\$300,000 in missionary expenses" in an IRS filing. According to the Defendants, the Plaintiff then stated that World Mission New Jersey's members pay their own expenses when they do missionary work. According to the Defendants, the Plaintiff's statements falsely implied that World Mission New Jersey lied to the IRS about how this money was actually spent.

534. Yet, the Defendants knew at all relevant times that they would not be able to prove the falsity of these statements.
535. Specifically, the Defendants knew that the IRS filing in question was filed by a World Mission entity in Illinois, not by World Mission New Jersey.
536. Moreover, even if the statement was referring to an IRS filing made by World Mission New Jersey, the Defendants still knew that World Mission New Jersey members generally pay their own expenses when they do missionary work.
537. In ¶ 117 of the Virginia Complaint, in ¶ 120 of the New Jersey Complaint, in ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants alleged that, in the Financial Info Video, the Plaintiff promised "[m]ore information on the WMSCOG's questionable business connections and tax filings to come."
538. In ¶ 118 of the Virginia Complaint, in ¶ 121 of the New Jersey Complaint, in ¶ 64 of the FAC, and in ¶ 64 of the SAC, the Defendants alleged that the Plaintiff's statement that more information is coming implied that World Mission New Jersey lies to the IRS about the source of and use of its funding.

539. Yet, the Defendants knew at all relevant times that they would not be able to prove the falsity of this statement.
540. Specifically, the Defendants knew that the statement was referring to a World Mission entity in Illinois, or globally to all World Mission entities as a group, but not to World Mission New Jersey.
541. Moreover, even if the statement was referring to World Mission New Jersey, the Defendants knew that World Mission New Jersey did in fact lie to the IRS on its application for tax exemption, in response to a number of separate questions, about the source of and how it uses its funding.
542. Specifically, World Mission New Jersey lied to the IRS on its application for tax exemption by failing to disclose that most of the money it raises is sent to World Mission South Korea, which makes the ultimate decisions as to how that money is spent.
543. World Mission New Jersey also lied to the IRS on its application for tax exemption by claiming that it does not engage in fundraising, even though it constantly engages in fundraising by soliciting donations, tithes and offerings from its members.

12. THE DEFENDANTS FALSELY CHALLENGED THE AUTHENTICITY OF EVIDENCE

544. Every time the Plaintiff produced evidence to refute one of World Mission New Jersey's allegations, the Defendants would attack the authenticity of the Plaintiff's evidence, without having a good faith basis for doing so.
545. For instance, the Defendants falsely challenged the authenticity of World Mission New Jersey's own photographs showing gender-segregation taking place within

World Mission New Jersey.

546. The Defendants falsely challenged the authenticity of World Mission New Jersey's own webpage describing the relationship between World Mission New Jersey and its headquarters in South Korea.
547. The Defendants falsely challenged the authenticity of World Mission New Jersey's own webpage touting the benefits of overcoming a lack of sleep.
548. The Defendants even falsely challenged the authenticity of the Five-Part Story and the PVSA Article – the same documents that World Mission New Jersey was suing over.

A. The Defendants Challenged the Authenticity of Gender-Segregation Photographs Without a Good Faith Basis

549. In ¶ 39 of the FAC, and in ¶ 39 of the SAC, the Defendants alleged that the Plaintiff stated in an online article that "I noticed that married couples and families did not study together unless there was a longer study being offered on a Sunday afternoon."
550. In those same paragraphs, the Defendants went on to explain that the challenged statement was false, and that the Plaintiff "could never have noticed that married couples and families 'did not study together unless there was a longer study being offered' because couples frequently study together, and often studied together in the presence of [the Plaintiff]."
551. The FAC and the SAC even asserted, rather brazenly, that "The statement implies that [World Mission New Jersey] separates families when it does not."
552. Yet, World Mission New Jersey does in fact separate families.
553. World Mission New Jersey actually adheres to a strictly enforced policy of

- segregating the men and women during study sessions and worship services.
554. In fact, World Mission New Jersey actually holds itself out to the world as an organization that segregates men and women as part of its "religious" practice.
555. Specifically, World Mission New Jersey publishes photographs on its website showing men and women separately attending study sessions, and sitting separately at worship services.
556. The Plaintiff produced such photographs during the litigation, and submitted them to the court in support of her motion to dismiss on December 3, 2012 (the "Gender-Segregation Photographs").
557. The Defendants knew that the Gender-Segregation Photographs were authentic pictures taken from World Mission New Jersey's website.
558. Nevertheless, at the January 11, 2013 oral argument for the Plaintiff's motion to dismiss, the Defendants, acting through their lawyers, lied to the court and falsely represented to the court that the Gender-Segregation Photographs could not be authenticated.
559. In fact, the Defendants tried to convince the court that World Mission New Jersey does not regularly engage in the practice of segregating men and women.
560. Rather, the Defendants, acting through their lawyers, tried to explain away the Gender-Segregation Photographs by suggesting to the court that on one occasion - at various World Mission locations around the world – World Mission segregated the men and women, took pictures, put the pictures on World Mission's official website, and then never segregated the men and women again after that.
561. Yet, the Defendants knew that was not the case.

562. In fact, it was a lie.
563. World Mission New Jersey does in fact segregate men and women on a daily basis.
564. Nevertheless, the Defendants challenged the authenticity of the Gender Segregation Photographs without any good faith basis for doing so.
565. World Mission New Jersey subsequently admitted in response to one of the Plaintiff's interrogatories that the website from which the Plaintiff obtained the Gender-Segregation Photographs was in fact World Mission New Jersey's website.
566. Thus, the Defendants knew that they were lying when they asserted that the Gender-Segregation Photographs were not authentic.
567. Although the Defendants knew that the Gender-Segregation Photographs were authentic, the Defendants relied on the false representation that they were not authentic to help World Mission New Jersey defeat the Plaintiff's motion to dismiss.

B. The Defendants Challenged the Authenticity of a World Mission New Jersey Webpage Describing World Mission New Jersey's Relationship With Its South Korean Headquarters, Without a Good Faith Basis

568. In ¶ 62 of the New Jersey Complaint, the Defendants alleged that the Plaintiff posted a statement to the Ross Site in which she stated that World Mission New Jersey "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.
569. In ¶ 34 of the FAC, and in ¶ 34 of the SAC, the Defendants alleged that the

Plaintiff posted the following statement on the Ross Site:

"Does the organization control or is it controlled by any other organization?". The WMSCOG checked off "NO". The WMSCOG locations are NOT independent and are all controlled by the main location in Seoul, S. Korea. Why would they answer "NO" to this question?

570. Yet, World Mission New Jersey's own website described its relationship with the main location in South Korea like this:

The Head Office of the World Mission Society Church of God is the center of the 1,400 local Churches of God throughout the world, and it supports each local Church with preaching, education, administration, management, overseas mission, and culture & arts, so that they can spread the message of salvation to all peoples, following the will of Elohim.

571. On December 3, 2012, the Plaintiff filed a copy of that webpage (the "Head Office Webpage") in support of her motion to dismiss.

572. At the January 11, 2013 oral argument, the Defendants, acting through their lawyers, lied to the court and asserted that the Head Office Webpage could not be authenticated.

573. In fact, the Head Office Webpage produced by the Plaintiff really was an authentic copy of World Mission New Jersey's own webpage.

574. The Defendants knew at all times that the Head Office Webpage was in fact an authentic copy of a webpage taken from World Mission New Jersey's website.

575. Nevertheless, the Defendants challenged the authenticity of the Head Office Webpage without any good faith basis for doing so.

576. World Mission New Jersey subsequently admitted in response to one of the Plaintiff's interrogatories that the website from which the Plaintiff obtained the

Head Office Webpage was in fact World Mission New Jersey's website.

577. Thus, the Defendants knew that they were lying when they asserted that the Head Office Webpage was not authentic.

578. Although the Defendants knew that the Head Office Webpage was authentic, the Defendants relied on the false representation that it was not authentic to help World Mission New Jersey defeat the Plaintiff's motion to dismiss.

C. The Defendants Challenged the Authenticity of a World Mission New Jersey Webpage Touting the Benefits of Sleep Deprivation, Without a Good Faith Basis

579. In ¶ 81 of the New Jersey Complaint, the Defendants alleged that the Plaintiff stated in the Five-Part Story that World Mission New Jersey was keeping her and her husband "sleep deprived."

580. In ¶ 102(d) of the New Jersey Complaint, in ¶ 56 of the FAC, and in ¶ 56 of the SAC, the Defendants alleged that, in the Destroys Families Video, the Plaintiff stated that "The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process."

581. In ¶ 56 of the FAC, and in ¶ 56 of the SAC, the Defendants asserted that World Mission New Jersey "does not use sleep deprivation as a means to make its members more vulnerable to any indoctrination process."

582. Yet, World Mission New Jersey's own website contained a page discussing the virtue of overcoming a lack of sleep ("Sleep Deprivation Webpage").

583. On December 3, 2012, the Plaintiff filed a copy of the Sleep Deprivation Webpage in support of her motion to dismiss.

584. At the January 11, 2013 oral argument, the Defendants, acting through their

lawyers, lied to the court and asserted that the Sleep Deprivation Webpage could not be authenticated.

585. In fact, the Sleep Deprivation Webpage produced by the Plaintiff really was an authentic copy of World Mission New Jersey's own webpage.

586. The Defendants knew at all times that the Sleep Deprivation Webpage was in fact an authentic copy of a webpage taken from World Mission New Jersey's website.

587. Nevertheless, the Defendants challenged the authenticity of the Sleep Deprivation Webpage without any good faith basis for doing so.

588. World Mission New Jersey subsequently admitted in response to one of the Plaintiff's interrogatories that the website from which the Plaintiff obtained the Sleep Deprivation Webpage was in fact World Mission New Jersey's website.

589. Thus, the Defendants knew that they were lying when they asserted that the Sleep Deprivation Webpage was not authentic.

590. Although the Defendants knew that the Sleep Deprivation Webpage was authentic, the Defendants relied on the false representation that it was not authentic to help World Mission New Jersey defeat the Plaintiff's motion to dismiss.

D. The Defendants Challenged the Authenticity of the Five-Part Story and the PVSA Article – the Same Articles That World Mission New Jersey Was Suing Over

591. In ¶ 72-87 of the New Jersey Complaint, in ¶¶ 38-48 of the FAC, and in ¶¶ 38-48 of the SAC, World Mission New Jersey alleged that various statements contained in the Five-Part Story were defamatory.

592. In ¶ 88-97 of the New Jersey Complaint, in ¶¶ 49-52 of the FAC, and in ¶¶ 49-52

of the SAC, World Mission New Jersey alleged that various statements contained in the PVSA Article were defamatory.

593. The Plaintiff had included copies of the Five-Part Story and the PVSA Article with her motion to dismiss papers, filed on August 24, 2012.

594. Yet, at the January 11, 2013 oral argument, the Defendants, acting through their lawyers, lied to the court and asserted that the Five-Part Story and the PVSA Article could not be authenticated.

595. The Defendants made that assertion even though they had been looking at the Five-Part Story and the PVSA Article when they formulated the Virginia Case and the New Jersey Case.

596. In fact, the Defendants repeatedly quoted directly from the Five-Part Story and the PVSA Article in the four Complaints they filed against the Plaintiff, so they necessarily had to have copies of the articles in their possession.

597. Thus, the Defendants knew that the copies of the Five-Part Story and the PVSA Article produced by the Plaintiff were identical in substance to the ones that the Defendants had been relying on when drafting the Virginia Complaint, the New Jersey Complaint, the FAC, and the SAC.

598. Nevertheless, the Defendants falsely declared that the Five-Part Story and the PVSA Article produced by the Plaintiff could not be authenticated.

599. World Mission New Jersey subsequently produced their own versions of the Five-Part Story and the PVSA Article in response to discovery demands made by the Plaintiff.

600. The text in the versions of the Five-Part Story and the PVSA Article produced by

World Mission New Jersey turned out to be identical to the versions produced by the Plaintiff on August 24, 2012.

601. Thus, the Defendants knew that they were lying when they asserted that the Five-Part Story and the PVSA Article were not authentic.

602. Although the Defendants knew that the Five-Part Story and the PVSA Article were authentic, the Defendants relied on the false representation that they were not authentic to help World Mission New Jersey defeat the Plaintiff's motion to dismiss.

13. THE DEFENDANTS SUED THE PLAINTIFF FOR TRADE LIBEL WITHOUT EVER INTENDING TO PRODUCE EVIDENCE OF SPECIAL DAMAGES

603. In ¶¶ 150-58 of the Virginia Complaint, in ¶¶ 150-58 of the New Jersey Complaint, in ¶¶ 107-16 of the FAC, and in ¶¶ 107-16 of the SAC, the Defendants asserted a cause of action for trade libel.

604. In New Jersey, a cause of action for trade libel by a nonprofit organization or a church requires the plaintiff to disclose the specific amounts of donations that were lost, or the specific names of donors, that were lost, as a result of the defendant's conduct.

605. Yet, the Defendants never intended to disclose any specific amounts of donations that they lost as a result of the challenged statements.

606. Nor did the Defendants ever intend to disclose the names of any donors who stopped contributing money to World Mission New Jersey as a result of the challenged statements.

607. In fact, the Defendants never made any such disclosures at any time during the litigation.

608. The reason the Defendants did not make any such disclosures during the litigation was because World Mission New Jersey did not lose any donations or donors as a result of the challenged statements.
609. The Defendants never had a good faith basis for believing that World Mission New Jersey had lost donations or donors as a result of the challenged statements.
610. In order to cover up for the fact that they knew that World Mission New Jersey had not lost any donations or donors as a result of the challenged statements, the Defendants came up with bizarre excuses for not producing the names of World Mission New Jersey's alleged lost donors.
611. For instance, the Defendants argued, through their lawyers, in papers filed on or around November 19, 2012 in opposition to the Plaintiff's motion to dismiss, that the disclosure of World Mission New Jersey's lost donors would violate the free association rights of the lost donors.
612. The Defendants, through their lawyers, compared the lost donors with African-Americans who had joined the NAACP in the Deep South during the Segregation Era.
613. Yet, the Defendants never had a good faith basis for making such a comparison.
614. African-Americans in the Deep South during Segregation would have been subject to lynching and other forms of violence if their associations with the NAACP had been disclosed.
615. World Mission New Jersey's former donors, on the other hand, have never been subjected to such violence and abuse.
616. More importantly, on information and belief, none of World Mission New

Jersey's former donors had ever even asked the Defendants to keep their association with World Mission New Jersey a secret.

617. In other words, the Defendants asserted the rights of third parties who had not asked to assert such rights, and then cited to those purported third-party rights as an excuse not to disclose the names of those third parties – even though the disclosure of such third parties was required as an element of World Mission New Jersey's trade libel claim.

618. The Defendants engaged in this deception in order to avoid disclosing to the court the fact that World Mission New Jersey had not experienced any lost donors or lost donations as a result of the challenged statements.

619. Most importantly, even after the Defendants made the decision not to disclose the names of any of World Mission New Jersey's lost donors, or specific amounts of World Mission New Jersey's lost donations, the Defendants still refused to voluntarily dismiss World Mission New Jersey's trade libel claims.

620. In other words, the Defendants continued to litigate the trade libel claims even after they made the decision that they were unwilling to satisfy the elements of the trade libel claims.

621. Put another way, the Defendants were never serious about litigating the trade libel claims on the merits.

622. Rather, the Defendants were litigating the trade libel claims solely to harass and intimidate the Plaintiff.

14. THE DEFENDANTS FALSELY CLAIMED THAT WORLD MISSION NEW JERSEY HAD LOST MEMBERS AND DONATIONS AS A RESULT OF THE CHALLENGED STATEMENTS

623. At all relevant times during the Virginia Case and the New Jersey Case, the Defendants knew that World Mission New Jersey had not suffered any damages as a result of the challenged statements allegedly made by the Plaintiff.
624. Yet, throughout the Virginia Complaint, the New Jersey Complaint, the FAC, and the SAC, the Defendants repeatedly alleged that World Mission New Jersey had been damaged as a result of the challenged statements.
625. The Defendants repeatedly claimed that World Mission New Jersey had been damaged in the form of lost members and lost donations resulting from the publication of the challenged statements.
626. In fact, in the Virginia Complaint and in the New Jersey Complaint, the Defendants claimed that they were entitled to five million dollars in compensatory damages.
627. The Defendants never had a good faith basis for believing that World Mission New Jersey had suffered five million dollars in damage as a result of the challenged statements.
628. The only purpose for putting such a large damages number in the various complaints was to harass and intimidate the Plaintiff so that she would stop speaking out against World Mission.
629. In fact, at the time that each lawsuit was filed, the Defendants had no good faith basis for believing that the challenged statements had caused any damage to World Mission New Jersey at all.
630. At the time that each lawsuit was filed, the Defendants were aware that World Mission New Jersey was "defamation-proof," in that there was already such

negative information about World Mission on the internet that the statements allegedly posted by the Plaintiff could not have reasonably been isolated as the cause of any reputational damage.

631. The Defendants were aware of World Mission's negative online reputation because they actively monitored negative statements that were made about World Mission online.

632. World Mission's negative online reputation existed even prior to the Plaintiff joining World Mission New Jersey in October 2009.

633. In fact, there was a continuous onslaught of negative comments about World Mission being posted online during the Plaintiff's membership in World Mission New Jersey, and it has continued ever since she left.

634. The slew of negative online comments about World Mission are generally similar to the comments that were at issue in the Virginia Case and in the New Jersey Case. For instance, there were numerous complaints posted online accusing World Mission of being a "cult," using "mind control," and "destroying families."

635. Many other online posts have attacked World Mission significantly harder than any of the challenged statements in the Virginia Case and the New Jersey Case did.

636. The Defendants never had any evidence to show that the damages they were claiming were caused by the specific challenged statements they were suing over, as opposed to being caused by the numerous other online statements that expressed negative criticism of World Mission.

637. The Plaintiff repeatedly warned the Defendants throughout the litigation that they

had no good faith basis to believe that the challenged statements caused damage to World Mission New Jersey.

638. The judge presiding over the New Jersey Case also warned the Defendants that she was skeptical about their ability to prove that the challenged statements caused damage to World Mission New Jersey.

639. Despite those warnings, the Defendants continued to pursue the litigation.

640. On information and belief, the Defendants never actually intended to prove that World Mission New Jersey had suffered any damages.

641. Rather, the Defendants had assumed that the Plaintiff would be so intimidated by the lawsuit that she would agree not to speak out against World Mission anymore.

642. When the Plaintiff failed to surrender, the Defendants had no means of proving that World Mission New Jersey had suffered any damages.

643. Yet, the Defendants refused to drop the lawsuit.

644. Instead, when the Plaintiff demanded evidence of such damages pursuant to the court rules, the Defendants responded only by seeking extensions of time, making objections, and failing to produce any such evidence.

645. For instance, throughout the litigation, the Plaintiff repeatedly demanded that the Defendants produce financial documents to show the revenue it lost as a result of the Plaintiff's actions, but the Defendants repeatedly refused to comply.

646. The Plaintiff also repeatedly demanded that the Defendants produce the names of members that it lost as a result of the Plaintiff's actions, but the Defendants repeatedly refused to comply.

647. Moreover, the Plaintiff served the Defendants with an interrogatory demanding

the Defendants to:

Provide an itemized list of the particulars of every expense, financial loss, and/or other damage you contend you incurred as a result of the acts of Ms. Colón or Newton for which you contend that Ms. Colón is liable, including but not limited to attorneys' fees incurred in connection with this case. Identify each category of damages for which you are claiming damages, and for each such category, identify the total amount of damages you are claiming, and describe how that amount was calculated.

648. The purpose of that interrogatory was to obtain information from the Defendants regarding World Mission New Jersey's damages.
649. Yet, the only answer that the Defendants provided to the Plaintiff was:
- [World Mission New Jersey] has not yet retained any experts.
650. That was the only information about damages that World Mission New Jersey had provided to the Plaintiff at the time the discovery period ended on May 29, 2014.
651. The Defendants never identified an expert or produced an expert report prior to the discovery end date of May 29, 2014.
652. The Defendants never even produced any of the underlying documents that such an expert would need to rely on to form an opinion about World Mission New Jersey's alleged damages.
653. In fact, the Defendants failed to produce any financial documents or membership documents that could be used to support a damages claim prior to the discovery end date.
654. On July 18, 2014, after the discovery end date and in an act of desperation, the Defendants finally produced eight pages of financial documents, claiming that an "administrative error" was responsible for the lack of timely production.

655. However, those documents did not provide any evidence of a financial loss, and certainly no evidence of a financial loss caused by the Plaintiff.
656. The documents produced purported to be balance sheets and profit and loss statements for World Mission New Jersey for the years 2009 through 2012.
657. The Defendants refused to produce any of the underlying source material that was used to create those documents, making it impossible to ascertain the documents' reliability.
658. Nevertheless, the documents did not show that World Mission New Jersey had suffered any damages.
659. To the contrary, the documents showed that World Mission New Jersey almost doubled its annual net income – from close to \$1.9 million to more than \$3.6 million – during the four year span from 2009 through 2012, a time period that includes the summer of 2011, when the challenged statements were allegedly posted.
660. When 2011 ended, according to the documents, World Mission New Jersey had earned net profits of \$3.3 million for the year, up from \$2.1 million the year before.
661. There was nothing in the documents to suggest that World Mission New Jersey could have earned even more money had it not been for the challenged statements.
662. There was nothing to show that the rate of World Mission New Jersey's growth had slowed down because of the challenged statements.
663. There was no month by month breakdown to indicate that World Mission New

Jersey lost any revenue in the summer or fall of 2011, in the months following the publication of the challenged statements.

664. There was no data that an expert could reasonably rely on to come to the conclusion that World Mission New Jersey was adversely impacted by the publication of the challenged statements.

665. In other words, the Defendants were either never in possession of any evidence showing damages, or they never had any intention of producing such evidence.

666. At one point, at a July 11, 2014 hearing in the New Jersey Case, the Defendants, acting through their attorneys, lied to the court by proffering that they had found a witness who was a member of World Mission New Jersey who was prepared to testify that the challenged statements had caused her relationship with a family member to be damaged.

667. Yet, the Defendants either never found such a witness, or never intended to produce such a witness.

668. The Plaintiff repeatedly asked for the identity of such a witness to be disclosed, and the Defendants refused.

669. The New Jersey Case ended with the Defendants having never disclosed the proffered witness.

670. The New Jersey Case ended with the Defendants having never produced any documentation of lost revenue resulting from the challenged statements.

671. The New Jersey Case ended with the Defendants having never disclosed the names of any person who had left World Mission New Jersey, or refused to join World Mission New Jersey, as a result of the challenged statements.

672. In other words, the Defendants never had a good faith basis for their assertion that World Mission New Jersey had lost donations and members as a result of the challenged statements.

673. The only reason the Defendants claimed that World Mission New Jersey had been damaged by the challenged statements was to harass and intimidate the Plaintiff so that she would stop speaking out against World Mission.

15. THE DEFENDANTS TRIED TO HARASS AND INTIMIDATE PLAINTIFF BY ADDING HER EX-HUSBAND AS A CO-PLAINTIFF

674. On or around January 28, 2013, the Defendants filed the FAC in the New Jersey Case.

675. In the FAC, the Defendants added the Plaintiff's ex-husband, Mr. Ortiz, as a co-plaintiff.

676. Mr. Ortiz brought claims for defamation, false light invasion of privacy, conspiracy, and intentional infliction of emotional distress.

677. On information and belief, Mr. Ortiz joined the case after being subjected to intense coercive social pressure by the Defendants.

678. Mr. Ortiz had no intention of suing the Plaintiff until the Defendants pressured him to join the case.

679. In fact, Mr. Ortiz had previously brought a separate divorce action against the Plaintiff.

680. In that divorce action, Mr. Ortiz could have raised the claims that he raised in the New Jersey Case, but he chose not to.

681. Moreover, the Defendants filed the FAC without first consulting with Mr. Ortiz in any meaningful way. This is evidenced by the fact that there are quite a number

of facts alleged in the FAC and the SAC that pertain to things that Mr. Ortiz had direct knowledge about. Nevertheless, the FAC and the SAC got those facts wrong.

682. For instance, the FAC and the SAC incorrectly stated the details of the Plaintiff's relationship with Mr. Ortiz and their involvement with World Mission New Jersey, such as when the Plaintiff and Mr. Ortiz first met, how long they were dating before joining World Mission New Jersey, when the Plaintiff first introduced Mr. Ortiz to World Mission New Jersey members, and whether and when Mr. Ortiz had doubts about World Mission New Jersey.

683. The FAC and the SAC also incorrectly stated the details surrounding a meeting that the Plaintiff and Mr. Ortiz had with cult expert, Rick Ross, such as the date and location of the meeting, how they traveled to the meeting, and how long the meeting lasted.

684. In other words, the Defendants asserted legal claims on behalf of Mr. Ortiz without Mr. Ortiz fully participating or comprehending what was taking place.

685. The Defendants brought Mr. Ortiz into the case for the sole purpose of harassing and intimidating the Plaintiff.

16. THROUGHOUT THE NEW JERSEY CASE, THE DEFENDANTS OBSTRUCTED THE PLAINTIFF'S ACCESS TO DISCOVERY

686. Even though the Plaintiff prevailed in the New Jersey Case, the New Jersey Case came to an end without the Plaintiff ever having received any meaningful discovery from World Mission New Jersey.

687. The Plaintiff had served World Mission New Jersey with numerous document demands and interrogatories seeking information about World Mission New

Jersey policies and practices related to the challenged statements.

688. Yet, the Defendants refused to provide any responsive information.
689. The Defendants understood that if they had provided responsive information, the evidence would have proven that the challenged statements were neither false nor defamatory.
690. Therefore, instead of producing responsive documents, the Defendants responded to the Plaintiff's discovery demands by seeking extensions of time, and ultimately, missing their December 30, 2013 deadline to respond.
691. When the Defendants finally responded to the Plaintiff's discovery demands on March 3, 2014, they responded by making objections, and failing to produce responsive evidence.
692. To make matters worse, the Defendants produced about 5,000 pages of non-responsive documents, apparently in an effort to drown the Plaintiff with paper and bury her with busy work.
693. Moreover, witnesses who were either members of World Mission New Jersey's litigation control group or otherwise under the control of members of World Mission New Jersey's litigation control group refused to give depositions in the case.
694. On December 6, 2013, the Plaintiff properly served Defendant Richard Whalen with a subpoena to give a deposition.
695. Whalen's testimony was relevant because he was a member of World Mission New Jersey's litigation control group.
696. Whalen refused to comply with that subpoena.

697. Whalen never made a motion to quash the subpoena, and he never informed the Plaintiff of the basis of his objection. He simply refused to appear.
698. Then, on December 9, 2013, Big Shine was properly served with a subpoena requiring it to produce a representative to give a deposition.
699. The testimony of a Big Shine representative was relevant because Big Shine was discussed in many of the challenged statements.
700. Yet, Big Shine refused to send a representative to appear for a deposition in response to that properly served subpoena.
701. Big Shine was under the control of its owner, Defendant Dong Il Lee, who was also a member of World Mission New Jersey's litigation control group.
702. Thus, Defendants Dong Il Lee and Richard Whalen obstructed the Plaintiff's access to evidence by refusing to allow testimony to be given in response to properly served subpoenas.
703. The Defendants also refused to produce key documents that they understood would prove that the New Jersey Case was frivolous, including but not limited to the books written by Defendant Kim, and by World Mission's founder, Ahn Sahng Hong.
704. As a result of these discovery violations, the Plaintiff found it necessary to file numerous discovery motions to try to obtain the evidence.
705. Those motions were still pending when the discovery end date of May 29, 2014 arrived.
706. One of those motions addressed World Mission New Jersey's failure to produce any evidence of its damages.

707. On or around August 6, 2014, World Mission New Jersey filed a motion to extend the discovery end date.
708. On August 27, 2014, the court denied World Mission New Jersey's motion to extend the discovery end date, due to the fact that World Mission New Jersey had defaulted on its obligation to produce evidence of damages.
709. Thus, the Plaintiff's remaining discovery motions became moot.
710. On August 27, 2014, the court denied all of the Plaintiff's outstanding discovery motions on mootness grounds.
711. Thus, the Plaintiff was unable to obtain the evidence needed to prove that the New Jersey Case was frivolous.
712. The Plaintiff subsequently prevailed on her summary judgment motion, which was filed on August 8, 2014, and decided on February 9, 2015.
713. Thus, even though the Plaintiff prevailed in the New Jersey Case, she has still not obtained the evidence from World Mission New Jersey that would prove that the challenged statements are not false, and that the Defendants knew that the challenged statements were not false while they were litigating the New Jersey Case.
714. Such evidence is necessary to prove that the New Jersey Case, and its predecessor, the Virginia Case, were frivolous.
715. Thus, the Plaintiff intends to obtain such evidence with this case.

17. THE DEFENDANTS HAD MALICE TOWARDS THE PLAINTIFF

716. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

717. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.
718. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
719. Specifically, World Mission New Jersey teaches its members that anyone who leaves the group is evil.
720. World Mission New Jersey also teaches its members that anyone who criticizes the group is evil.
721. World Mission New Jersey even uses derogatory terms to refer to former members and critics, such as "unclean animals."
722. The Plaintiff was a former member of World Mission New Jersey.
723. The Plaintiff was also an outspoken critic of World Mission New Jersey.
724. Therefore, the Defendants formed the belief that the Plaintiff was evil, or an "unclean animal."
725. World Mission New Jersey teaches its members to feel hatred towards such "unclean animals."
726. At one point, on information and belief, World Mission New Jersey leaders displayed a photograph of the Plaintiff to World Mission New Jersey members, while disparaging the Plaintiff's character and warning the World Mission New Jersey members that the Plaintiff was evil and dangerous.
727. Thus, the Defendants developed feelings of hatred and malice towards the Plaintiff.

728. Moreover, World Mission New Jersey teaches its members that they should be willing to attack and destroy World Mission critics, in order to defend the "Mother God," which is the name used by World Mission to refer to Defendant Zahng.
729. Thus, the Defendants came to believe that they were justified in taking whatever steps were necessary, including the filing of illegal frivolous lawsuits, to destroy the Plaintiff.
730. In other words, the filing of the Virginia Case and the New Jersey Case were motivated by the Defendants' hatred and malice towards the Plaintiff.

18. DEFENDANTS WORLD MISSION SOUTH KOREA, GIL JAH ZAHNG, AND JOO CHEOL KIM ARE ALTER EGOS OF DEFENDANT WORLD MISSION NEW JERSEY

731. World Mission New Jersey and World Mission South Korea claim to be two separate entities.
732. In reality, however, they are both two branches of the same organization.
733. World Mission New Jersey and World Mission South Korea are alter egos of each other.
734. Moreover, World Mission New Jersey is an alter ego of Zahng and Kim, who assert near-total control over World Mission New Jersey.
735. The money raised by World Mission New Jersey actually belongs to World Mission South Korea.
736. Most of the money raised by World Mission New Jersey is transferred to World Mission South Korea.
737. World Mission South Korea allows World Mission New Jersey to keep a portion

of the money it raises to cover its operating expenses.

738. It was World Mission South Korea, Zahng, and Kim, that made the decision to sue the Plaintiff.
739. When World Mission South Korea discovered the challenged statements related to Big Shine, an agent of World Mission South Korea called Defendant Lee.
740. World Mission South Korea's agent instructed Defendant Lee to hire a lawyer to sue the Plaintiff.
741. Defendant Lee could not have made the decision to sue without permission from World Mission South Korea, because he would not have had the authority to spend World Mission New Jersey's money on a lawyer without World Mission South Korea's permission.
742. Thus, World Mission South Korea, and its two leaders, Zahng and Kim, were the driving forces behind the Virginia Case and the New Jersey Case.
743. Yet, during the Virginia Case and the New Jersey Case, World Mission South Korea, Zahng, and Kim all hid behind the illusion that World Mission South Korea and World Mission New Jersey are separate entities, to avoid being held responsible for bringing frivolous litigation against the Plaintiff.
744. The Plaintiff is now suing World Mission South Korea, Zahng, and Kim in order to hold them fully responsible for the damages they inflicted on the Plaintiff.

CLAIMS FOR RELIEF

CAUSE OF ACTION #1

MALICIOUS PROSECUTION OF GROUNDLESS CIVIL PROCEEDING

(Under Virginia Common Law Arising out of Virginia Case)

745. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs.
746. The Defendants initiated the Virginia Case by filing the Virginia Complaint on or around December 6, 2011.
747. As explained throughout this Complaint, the Virginia Complaint was filed without probable cause.
748. The Defendants had malice towards the Plaintiff because she was a former member of the World Mission Enterprise who had been outspoken in her criticism of the World Mission Enterprise, and the World Mission Enterprise teaches its members that anyone who leaves the group, and anyone who criticizes the group, is evil.
749. Thus, the filing of the Virginia Complaint was actuated by malice.
750. Although the Plaintiff was dismissed from the Virginia Case for lack of personal jurisdiction on March 16, 2012, she did not receive a favorable termination of the issues raised in the Virginia Case until September 16, 2015, with the expiration of World Mission New Jersey's time to appeal its loss on the Plaintiff's summary judgment motion in the New Jersey Case.
751. The filing and prosecution of the Virginia Case directly and proximately caused the Plaintiff to suffer a special injury, in that it caused chilling effects to be imposed on the Plaintiff's speech, and thus her right to free speech was actually infringed.
752. As a direct and proximate result of the filing and prosecution of the Virginia Case, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror.

753. As a direct and proximate result of the filing and prosecution of the Virginia Case, the Plaintiff was damaged, in that she incurred legal fees and costs to defend against the Virginia Case.

CAUSE OF ACTION #2

MALICIOUS USE OF PROCESS

(Under New Jersey Common Law Arising out of New Jersey Case)

754. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs.

755. The Defendants initiated the New Jersey Case by filing the New Jersey Complaint on or around July 11, 2012.

756. The Defendants filed the FAC on or around January 28, 2013.

757. The Defendants filed the SAC on or around April 24, 2013.

758. As explained throughout this Complaint, all three of those complaints were filed without probable cause.

759. The Defendants had malice towards the Plaintiff because she was a former member of the World Mission Enterprise who had been outspoken in her criticism of the World Mission Enterprise, and the World Mission Enterprise teaches its members that anyone who leaves the group, and anyone who criticizes the group, is evil.

760. Thus, the filing of all three complaints in the New Jersey Case were actuated by malice.

761. The Plaintiff received a favorable termination in the New Jersey Case on September 16, 2015, with the expiration of World Mission New Jersey's time to appeal its loss on the Plaintiff's summary judgment motion.

762. The filing and prosecution of the New Jersey Case directly and proximately caused the Plaintiff to suffer a special grievance, in that it caused chilling effects to be imposed on the Plaintiff's speech, and thus her right to free speech was actually infringed.
763. As a direct and proximate result of the filing and prosecution of the New Jersey Case, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror.
764. As a direct and proximate result of the filing and prosecution of the New Jersey Case, the Plaintiff was damaged, in that she incurred legal fees and costs to defend against the New Jersey Case.

CAUSE OF ACTION #3

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Under Virginia Common Law Arising out of Virginia Case)

765. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs.
766. Taken together, the actions and omissions of the Defendants with respect to the Virginia Case, as alleged throughout this Complaint, constitute extreme and outrageous conduct, in that the actions are so extreme so as to exceed all bounds of conduct usually tolerated in a civilized community.
767. The Defendants engaged in this extreme and outrageous conduct with the intention of causing, or with reckless disregard of the probability of causing, emotional distress in the Plaintiff.
768. The Defendants' extreme and outrageous conduct was neither justified nor privileged.

769. The Plaintiff did not knowingly consent to the Defendants' extreme and outrageous conduct.
770. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was caused to suffer severe emotional distress, which was so extreme that no reasonable person could be expected to endure it.
771. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror.
772. The Defendants' extreme and outrageous conduct constitutes an ongoing tort that did not come to an end until the Plaintiff received a favorable termination of the litigation on September 16, 2015.

CAUSE OF ACTION #4

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Under New Jersey Common Law Arising Out of New Jersey Case)

773. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs.
774. Taken together, the actions and omissions of the Defendants with respect to the New Jersey Case, as alleged throughout this Complaint, constitute extreme and outrageous conduct, in that the actions are so extreme so as to exceed all bounds of conduct usually tolerated in a civilized community.

775. The Defendants engaged in this extreme and outrageous conduct with the intention of causing, or with reckless disregard of the probability of causing, emotional distress in the Plaintiff.
776. The Defendants' extreme and outrageous conduct was neither justified nor privileged.
777. The Plaintiff did not knowingly consent to the Defendants' extreme and outrageous conduct.
778. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was caused to suffer severe emotional distress, which was so extreme that no reasonable person could be expected to endure it.
779. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror.
780. The Defendants' extreme and outrageous conduct constitutes an ongoing tort that did not come to an end until the Plaintiff received a favorable termination of the litigation on September 16, 2015.

DEMAND FOR RELIEF

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;

- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

TRIAL COUNSEL DESIGNATION

Pursuant to Rule 4:5-1, Paul S. Grosswald, is hereby designated as trial counsel.

JURY DEMAND

The Plaintiff demands trial by jury on all issues so triable.

RULE 4:5-1 CERTIFICATION

I hereby certify pursuant to Rule 4:5-1 that as of the date below, to the best of my knowledge, information and belief, the controversy that is the subject of this lawsuit is not the subject of any other action pending in any other Court, nor is it the subject of any pending arbitration proceeding.

However, to the extent that the Defendants intend to hold their former lawyers and law firms responsible for any liability the Defendants owe to the Plaintiff, the Defendants may wish to add their former lawyers and law firms to this case as third-party defendants. Moreover, if the Defendants raise an advice-of-counsel defense, the Plaintiff will seek to add the Defendants' former lawyers and law firms as defendants. Those lawyers and law firms include:

Estate of John W. Dozier c/o Alan Dozier, executor

on behalf of Dozier Internet Law, P.C. (defunct) and John W. Dozier, Jr., Esq. (deceased)

Law Offices of Batya G. Wernick

Batya G. Wernick, Esq.

Nesenoff Miltenberg Goddard Laskowitz, LLP (as successors-in-interest to Nissenbaum & Miltenberg, LLP)

Andrew T. Miltenberg, Esq.

Marco A. Santori, Esq.
Diana R. Zborovsky, Esq.

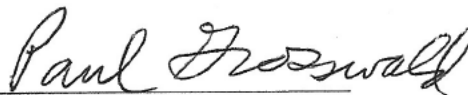
Law Offices of Jan Meyer & Associates, P.C.

Jan Meyer, Esq.
Solomon Rubin, Esq.

Furthermore, because Mr. Miltenberg and Mr. Santori were operating out of a New York law office, and were admitted to the New Jersey court pro hac vice on the basis of their New York law licenses, the Plaintiff is planning on bringing a separate lawsuit against those lawyers in federal court for violations of New York law.

No other related action or arbitration proceeding is currently contemplated. I further certify that, as of the date below and subject to the above, there are no other known parties who should be joined in the instant action.

Dated: August 26, 2016

By: 
PAUL S. GROSSWALD
Attorney for the Plaintiff,
Michele Colón