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**Attorneys for Plaintiff World Mission Society
Church of God**

<p>WORLD MISSION SOCIETY CHURCH OF GOD and MARK ORTIZ,</p> <p style="text-align: center;">Plaintiffs</p> <p style="text-align: center;">-against-</p> <p>MICHELE COLÓN and TYLER NEWTON,</p> <p style="text-align: center;">Defendants.</p>
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**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

DOCKET NO.: BER-L-5274-12

Civil Action

SECOND AMENDED COMPLAINT

Plaintiff World Mission Society Church of God (“Plaintiff World Mission” or the “Church”) and Plaintiff Mark Ortiz (“Plaintiff Ortiz”), by their attorneys, Nesenoff & Miltenberg, LLP, allege as follows:

NATURE OF THE ACTION

1. When her new marriage to Plaintiff Ortiz began to crumble, Defendant Michele Colón (“Defendant Colón”) lashed out publicly, blaming her husband’s church, her husband’s pastor and her husband’s religious beliefs. Instead of keeping their marital issues discreet, she used every tool of internet mass media at her disposal – discussion forums, business review websites, blogs, YouTube videos, even Facebook posts – to communicate to as many people as possible a simple message: “The World Mission Society Church of God ruined my marriage.”

2. Likewise, her goal was straightforward. She sought to make it so unpalatable for the Church to retain Plaintiff Ortiz as a member, that they would “let him go” (a phrase she herself used in a message to the Church’s Pastor) and she would have her husband back.

3. To be sure, Defendant Colón used the internet to attack the beliefs of the Church. Members of the Church hold some beliefs that are common among mainstream Christians: The Bible is the word of God; Jesus is God; God's ultimate teaching is peace, reconciliation and love. Members also hold beliefs that some, especially mainstream Christians, might consider strange: God exists in a female image as well as a male image, and the Sabbath is Saturday, not Sunday.

4. Defendant Colón partnered with Defendant Tyler Newton ("Newton"), a long-standing antagonist of the Church and its congregation. Together, they publicly criticized these beliefs, pointing out where they were internally inconsistent or contradicted scripture. This Complaint does not seek redress for these criticisms; Plaintiffs welcome religious discourse, however incisive it may be. Indeed, incisive religious discourse is what fueled the Church in its infancy, and continues to fuel it today.

5. On the contrary, Plaintiffs seek to hold Defendants liable for those instances where their zealotry in winning the hearts and minds of the public crossed a line into the factually false: where Defendants stated that Plaintiff Ortiz was the subject of the Church's "North Korean prisoner-of-war" sleep deprivation and "mind-control tactics"; where Defendants stated that the Church lied to the Internal Revenue Service (the "IRS"); where they stated that "children and infants" were expected to go without food and water for days at a time; where they stated that the Church only earned the President of the United States' prestigious Volunteer Service Award because it broke the rules of the award program. Plaintiff World Mission also seeks to hold liable Defendants for those instances where – even though not speaking strictly factually – they maliciously painted Plaintiff World Mission in a false light.

6. Plaintiffs' is a relatively new religion taking hold in the United States. It is very much in a nascent state, and because of its unfamiliar beliefs, it is as vulnerable to persecution as

any new religion throughout history. Defendants' campaign was, by any reasonable definition, persecution of the most systematic and insidious order, the same persecution once faced by Jews, Protestants, Muslims, Buddhists, Baha'is and Falun Gong. Instead of using their words for fair, honest discourse, Defendants have abused their right to free speech, using false speech to drive a wedge between one man – Plaintiff Ortiz – and his chosen Church, his chosen congregation and his faith in his God. In doing so, she has damaged not only Plaintiff Ortiz and the Church, but its innocent members.

PARTIES

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

8. Plaintiff Ortiz is an individual member of Plaintiff World Mission, and a resident of New Jersey.

9. Defendant Colón is an individual, and a former member of Plaintiff World Mission. Defendant Colón resides in Passaic County, New Jersey.

10. Defendant Newton is an individual who resides in Fairfax, Virginia.

JURISDICTION AND VENUE

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

12. Defendant Newton purposefully and explicitly targeted Plaintiffs in the State of New Jersey, worked in conspiracy with Defendant Colón, in and from the State of New Jersey. He knew Plaintiffs resided in New Jersey and made specific reference to the State of New Jersey

in the statements complained-of in this Complaint. As such, Defendant Newton should reasonably have anticipated being hauled into court here.

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

FACTS RELEVANT TO ALL CAUSES OF ACTION

14. Plaintiff Ortiz and Defendant Colón met on or about January 2009. They began dating and, before long, considered themselves a couple.

Defendant Colón Introduces Plaintiff Ortiz to the Church

15. Defendant Colón had been an involved member of Plaintiff World Mission prior to meeting Plaintiff Ortiz. Defendant Colón regularly attended services and bible study with the Church

16. Within two weeks of their meeting, Defendant Colón introduced Plaintiff Ortiz to other members of the Church, and asked him to attend Church services together with her. Plaintiff Ortiz agreed, and the two began attending services together regularly. Soon, they both considered themselves full-fledged members of Plaintiff World Mission. As any couple might, they spent a substantial amount of their free time together, involved in Church activities.

17. Approximately six months after their meeting, Plaintiff Ortiz and Defendant Colón encountered discord in their relationship. Defendant Colón suggested that they set a meeting with Daniel Lee, the Pastor of Plaintiff World Mission, for relationship counseling. The two subsequently met with Pastor Lee over the course of months. Ultimately, with the Pastor's guidance, the two determined that some, though not all, of their relationship challenges would be resolved by marriage in the Church.

18. Thanks largely to the Church's steady involvement and constant guidance, on May 9, 2010, Plaintiff Ortiz and Defendant Colón were married in the Church.

As Defendant Colón's Belief in World Mission Doctrine Wavers, and her Marriage Falters, She Purportedly Seeks Help from the Church

19. Upon information and belief, soon after returning from their honeymoon, Defendant Colón's belief in the religious teachings of the Church began to waiver. For example, she questioned the belief that the Sabbath day is a Saturday, and that God exists in the female form.

20. Though she attended services less regularly, she met with Pastor Lee frequently to discuss her religious doubts. Plaintiff Ortiz did not share in these doubts, but would attend these meetings so that he too could understand his wife's concerns.

21. Defendant Colón's involvement with the Church, usually regular, became sporadic. She stopped attending weekly services, skipped bible study, and limited her interaction with other congregants. Plaintiff Ortiz, on the other hand, remained steadfast in his beliefs. He continued attending services and participating in Church activities with the same regularity as he always had in the past months.

22. Despite being a newly-married couple, Defendant Colón and Plaintiff Ortiz spent less and less of their free time together, and fought more and more often.

23. Defendant Colón suggested that the couple see a marriage counselor. Plaintiff Ortiz was reluctant, but she assured him that she had selected a marriage counselor that came highly-recommended.

Defendant Colón Reveals her True Plan

24. At his wife's insistence, on or around June, 2010, Plaintiff Ortiz met Defendant Colón at the office of Rick A. Ross in Camden, New Jersey.

25. After an hour of “marriage counseling” it became apparent that Mr. Ross was not a relationship counselor at all. He is, in fact, the founder and executive director of the Rick A. Ross Institute for the Study of Destructive Cults.

26. In 1995, Ross was found liable by the United States District Court, Western District of Washington, for the forcible abduction and “deprogramming” of an eighteen-year-old member of Life Tabernacle Church in Washington State, where the church member was held down and handcuffed by the three men, gagged with duct tape from ear to ear, had his ankles tied with rope, and was kept prisoner in a locked building for days until he finally escaped.

27. Now finding himself lied to by his own wife, and duped into confiding in this man, Plaintiff Ortiz was outraged and left the “marriage counseling session” immediately, and while he still could. The sham “marriage counseling” session shall be referred to hereinafter as the “Attempted Deprogramming”.

Defendant Colón’s Double Life

28. Unknown to Plaintiffs at the time, Defendant Colón had been leading a double life. For months, she professed “doubts” about the Church’s teachings, and purportedly sought counseling with Pastor Lee and other Church members. She attended services only selectively. When she attended Bible study meetings, she only listened. When a group of Church members organized community outreach, she only watched.

29. Upon information and belief, she was not studying the Bible; she was not worshipping with other members at services; she was not participating in community outreach. She was collecting reconnaissance on the members, administration and organization of Plaintiff World Mission. Defendant Colón used this information to launch a public assault on Plaintiff World Mission.

The Business Reviews

30. Defendant Colón took to the internet under a false name, to maintain her cover as a reverent church-goer, and posted “business review” articles, YouTube videos, and Facebook posts under various fake names, including “Hailey Stevens,” “haileystevens,” “HaileyStevens,” “HaileyStevens10”, “Hailey” and even “Tommy”:

- a. On local.com, she stated in seven different posts that Plaintiff World Mission is a “religious cult” that “destroy[s] families”, and that it “will destroy your family and take all of your money.” (the “Local.com Posts”)
- b. On yellowbot.com, Defendant Colón stated that Plaintiff World Mission “is a religious cult” that “wil [sic] destroy your family and take all of your money,” that Plaintiff World Mission is a “Religious Fraud,” and that “[m]any have had their marriages and families torn apart by this destructive mind control group.” (the “Yellowbot.com Post”)
- c. On patch.com, she stated that Plaintiff World Mission is a “religious cult” that “destroy[s] families” and “will destroy your family and take all of your money.” (the “Patch.com Post”)
- d. On findlocal.latimes.com, she stated “[the] World Mission Society Church of God deceives people” and that “the World Mission Society Church of God...purposefully withhold[s] information in order to deceptively recruit.” (the “LATimes.com Post”)
- e. On aidpage.com, she stated that Plaintiff World Mission “destroys families. (the “Aidpage.com Post”)
- f. On kudzu.com, she stated that Plaintiff World Mission is a “religious cult” that “destroy[s] families.” (the “Kudzu.com Post”)
- g. On socialcurrent.org, she stated that Plaintiff World Mission is a “religious cult” that “destroy[s] families.” (the Socialcurrent.com Post”)
- h. On chamberofcommerce.com and dexknows.com, she stated that Plaintiff World Mission is a “religious cult” that “wil [sic] destroy your family and take all of your money”. (the “chamberofcommerce.com Post”)
- i. On maps.google.com, she pinpointed the address of Plaintiff World Mission and stated that the “so called church is a cult” that “will tear apart your marriage and your family,” and that Plaintiff “brainwash[es] members in order to take all of their money from them. (the “Google.com Post” collectively, the “Business Reviews”)

31. Each Business Review was read by millions of people searching for information on Plaintiff World Mission.

The Rick Ross Institute Web Forum Posts

32. As part of her campaign, Defendant Colón used her fake names to post false statements on the website for the Rick Ross Institute Internet Archives for the Study of Destructive Cults. She also made statements directing readers to other false statements, like those available on youtube.com, set forth in detail, *infra*. (the “Rick Ross Forum Posts”)

33. Defendant Colón stated the false conclusion: “THE WORLD MISSION SOCIETY CHURCH OF GOD LIES ABOUT HOW THEIR CHURCH WAS FOUNDED ON THEIR APPLICATION FOR TAX EXEMPT STATUS!”

34. Defendant Colón supported this conclusion by stating false facts:

"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?

35. In fact, Plaintiff is not “controlled by the main location in Seoul S. Korea.” It is an independent entity, legally and functionally.

36. Defendant Colón further stated on this website that Plaintiff World Mission is “a destructive mind-control cult.”

37. This statement is false. Plaintiff World Mission is not a destructive mind-control cult.

The “Examining” Series of Articles

38. Defendant Newton operates a website and discussion forum dedicated to attacking the Church, available at examiningthewmscog.com. On this website, Defendant Colón and

Defendant Newton published a series of communications, each published a day or more apart from each other. The series was titled “How The WMSCOG Turned my Life Upside Down.” Defendants stated that the report originated from “our correspondent from New Jersey.” (the “Examining Articles”)

39. Defendants stated that “I noticed that married couples and families did not study together unless there was a longer study being offered on a Sunday afternoon.” This statement is false. Defendant Colón 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 Defendant Colón. The statement implies that Plaintiff World Mission separates families when it does not.

40. Defendants stated that “Members...would attend an approximately six-hour long group study.” This statement is false. Group study is never for six hours. Study lasts for, at most, one hour at a time. This statement implies that the Church requires long, uninterrupted blocks of its members’ time without permitting breaks.

41. Defendants 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.” This statement is false. The Church does not target people in their 20s and 30s and frequently approaches people of all ages when it evangelizes. This statement falsely implies that the Church targets the youthful and inexperienced when it evangelizes.

42. Defendants stated that Plaintiff 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.” This statement is false. The Church does not require or expect fasting from any member, and fasting is *specifically prohibited* from children and infants for

myriad reasons, especially health reasons. This statement falsely implies that the Church set up a program that was dangerous to the health and safety of infants and children.

43. Defendants asked “why are there so many divorced or separated members?” This question implies false facts, namely that there are “so many” divorced or separated members. This statement is false. On information belief, very few Church members, less than one in one hundred, are separated or divorced.

44. Defendants stated that Colón’s 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.” Defendants further stated that Colón “could not ignore the similarities to what she had experienced in the WMSCOG.” This statement is false. Plaintiff World Mission does not use North Korean-style mind control techniques. This statement is particularly damaging because the Church was founded in South Korea. As such, Defendants injected racial and historical half-truths to fuel their falsehoods.

45. Defendants stated that Plaintiff 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.” This statement is false. Plaintiff Ortiz was never chosen to participate in the program at issue. On the contrary, he volunteered. This false statement implies an improper motive on the part of Plaintiff World Mission in tune with the thesis of Defendants’ articles: that the Church maliciously selected her husband for a “special” program, so as to wrest his free time away from his wife, Defendant Colón. Moreover, the course was to teach 3 subjects in 30 days. This statement falsely implies that the Church hastily and poorly glosses over doctrine that it claims is important to it, and that the teaching is only pretext for dominating its members’ time and keeping them away from their families.

46. Based on the foregoing false statements, Defendants ultimately state that Plaintiff World Mission is a “cult”. Defendants state that Defendant Colón gave Plaintiff Ortiz an ultimatum: “either the cult or me.” This statement is false. Plaintiff World Mission is not a cult. Moreover, the statements upon which this statement is based are false.

47. Based on the foregoing false statements, Defendants also state that Plaintiff World Mission “destroyed her marriage” and that the Church is a “destructive organization.” This statement is false. Plaintiff World Mission did not destroy her marriage and the Church is not a destructive organization. On the contrary, as alleged, *supra*, the Church was a substantial factor in Defendant Colón’s reconciliation with and marriage to Plaintiff Ortiz in the first instance. Moreover, the statements upon which this statement is based are false.

48. Based upon the foregoing false statements, Defendants stated that the Church’s “intention was to cause division between my husband and I.” This statement is false. Neither the Church nor any of its members intended to cause division between Defendant Colón and Plaintiff Ortiz.

The Presidential Volunteer Service Award Article

49. Defendants published an article titled “The WMSCOG ‘Awarded by President Obama’?” (the “PVSA Article”).

50. The article stated:

According to the representative of the Presidential Volunteer Service Award office, the WMSCOG **should not have nominated their Ridgewood, New Jersey location** for the award since the “certifying organization” would in essence be **awarding themselves**.

(emphasis in original). Defendants further stated: “my church isn’t signing up to nominate itself to receive such a prestigious award.”

51. The PVSA article is false. On information and belief, no “representative” of the Presidential Volunteer Service Award office ever advised Defendants that “the WMSCOG should not have nominated their Ridgewood, New Jersey location for the award.” This information is confidential and only provided to the certifying organization. Organizations are permitted to certify the volunteer hours of their own members and other branches of the same organization so that they may be recognized by this award.

52. Moreover, the PVSA Article implies that the award was made to Plaintiff World Mission dishonestly, and that Plaintiff World Mission should not, under established rules, have received the award. This is also false.

The YouTube Videos

53. Defendant Colón created a series of YouTube videos using a movie-making service provided by the company Xtranormal. Xtranormal offers a service through its website that allows its users to create cartoon videos. The user submits written dialogue content. The cartoon characters speak this dialogue aloud in the generated cartoon video.

54. Through a fake username “HaileyStevens10”, in one such video, entitled “The World Mission Society Church of God – Destroys Families”, Defendant Colón stated: “The World Mission Society Church of God uses mind control tactics on its members in order to tear them apart from their families.” (the “Destroys Families Video”) This statement is false. Plaintiff World Mission does not use mind control tactics on its members in order to tear them apart from their families.

55. Defendant Colón further stated “The World Mission Society Church of God uses fear and guilt to prevent its members from going on vacation.” This statement is false. Plaintiff World Mission does not use fear and guilt to prevent its members from going on vacation.

56. Defendant Colón further stated “The World Mission Society Church of God uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process.” This statement is false. Plaintiff World Mission does not use sleep deprivation as a means to make its members more vulnerable to any indoctrination process.

57. Defendant Colón further stated “Every waking moment must be focused on controlling the member’s mind.” This statement is false. Plaintiff World Mission does not focus on controlling members’ minds.

58. Taken together, the statements imply that Plaintiff World Mission uses sleep-deprivation and mind-control tactics to indoctrinate and control its members. Further, it implies knowledge of more hidden facts and personal experiences that would support these statements.

59. Defendant Colón also made statements in a similar video, titled “World Mission Society Church of God – Public Financial Info!” (the “Financial Info Video”)

60. Defendant Colón stated that Plaintiff World Mission “does not provide any form of financial disclosures to its members,” and asks “so where does the money go?” Defendant Colón stated Plaintiff World Mission denied that “the organization has a direct business relationship through ownership of another entity.” Defendant Colón then stated that Plaintiff World Mission’s relationship to Big Shine Worldwide, Inc. is “a clear business relationship.” She further stated that this relationship is “quite suspect.”

61. Taken together, these statements imply that Plaintiff World Mission lied to the IRS because of its suspect business relationship with Big Shine Worldwide, Inc, that it disguised its business relationship, and that it is misusing its funds from the perspective of the IRS. Further, they imply hidden facts supporting that the relationship is “quite suspect”.

62. Defendant Colón states in the Financial Info Video that she is reading an IRS filing from one of the Church's branches in the video and notes that the form reports receipt of "a little over \$26,000 from a, quote, parental church." She then states that the form does not also report a corporate subsidiary relationship to its parent church headquartered in South Korea, and that this is suspect.

63. Plaintiff World Mission is not a corporate subsidiary of the parent church headquartered in South Korea. As such, this statement falsely implies that Plaintiff World Mission made dishonest statements to the IRS.

64. Defendant Colón states in the Financial Info Video that Plaintiff World Mission claimed "\$300,000 in missionary expenses" but states that Plaintiff's members pay their own expenses when they do missionary work. She then promises "[m]ore information on the WMSCOG's questionable business connections and tax filings to come." These statements imply the existence of false facts, namely that Plaintiff World Mission lies to the IRS about the source and use of its funding.

The Facebook Group

65. Defendant Newton posted on facebook.com, stating that Plaintiff World Mission is "laundering money". (the "Facebook Post") This statement is false. Plaintiff World Mission does not launder money.

66. 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.

Defendant Colón Reaches Beyond the Internet

67. When Plaintiff Ortiz discovered that Defendant Colón had spent the last several months campaigning to destroy his reputation and that of his church, he felt hurt, betrayed and finally, outraged.

68. Still, she made another twisted attempt to “save” him. Defendant Colón telephoned Plaintiff Ortiz’s mother. She explained that Plaintiff World Mission was a cult, that it used North-Korean style sleep-deprivation and mind-control tactics on her son, and that it forced him to go without food and water for days. She further stated that Plaintiff Ortiz was “going to Korea for the church, and never coming back.” (the “Statements to Mrs. Ortiz”) As set forth, *supra*, these statements are false.

69. As a result of these false statements, family members of Plaintiff Ortiz, including his mother, to this day believe that he is in a “mind control” cult that forces him to fast. They have, on multiple occasions telephoned Plaintiff Ortiz, crying, trying to prevent him from attending services at this “cult”.

70. On a separate occasion, at a public hearing concerning Plaintiff World Mission’s application to obtain a building code variance approval, Defendant Colón publicly stated that Plaintiff “damage[s] families, “ruined [her] marriage,” and “takes its members’ money.” (the “Variance Hearing Statements”) As set forth in detail, *supra*, these statements are false. Further, they suggest further hidden facts.

71. The audience of the Variance Hearing Statements consisted of Plaintiff Ortiz’s local church community, familiar with the Church and with Plaintiff Ortiz. As such, much of the audience would have understood these statements to have been of and concerning Plaintiff Ortiz, Defendant Colón’s husband. These statements implied that Plaintiff Ortiz allowed the Church to “damage” and “ruin” his marriage to Plaintiff Colón.

72. Because of its controversial beliefs, Plaintiff Ortiz was careful whom he told of his membership in the Church. Fearing false attacks on his beliefs, he did not make a habit of reporting his religious affiliation to people he was not close with. Now, Defendant Colón has not only “outed” his religious affiliation to his family and his entire community, she has done so on egregious terms – false terms – from which Plaintiff Ortiz may never recover.

Defendant Colón Distils her Campaign into one Final, Threatening Communication

73. Finally, Defendant Colón sent a threatening text message to Pastor Lee that distilled her months-long campaign into one, succinct statement: **“Mr. BigShine: All of your secrets will be revealed to your congregation if you do not let him go.”** Defendant Colón used another fake name and email address to send this message from an anonymous text-message forwarder. (the “Text Message”)

74. As his ordeal continued, Plaintiff Ortiz soon found himself with a congregation that distrusted him and a wife who used their intimacy to drive a wedge between him and his faith.

75. Plaintiff Ortiz has sued for divorce from Defendant Colón, which is currently pending. He still lives in fear that she will continue her attacks on him and his Church, and use those attacks to frustrate the public practice of his religion.

At all Times, Defendants Acted with Malice

76. Defendant Colón was a member of Plaintiff World Mission. She had inside knowledge of, among other things, the Church’s beliefs, daily rituals, bible study techniques and fellowship outings. This personal experience gave her the most effective means for determining whether their statements were true or false. She was there to witness whether, for example, the Church used “North-Korean style” sleep deprivation or mind-control techniques. She had the

ability to experience, in person, whether it required fasting from infants. Defendant Colón was Plaintiff Ortiz's wife: he shared with her his most private experiences, and she was privy to his most intimate thoughts. To be sure, Defendant Colon had the *opportunity*.

77. Defendant Colon also had *means*. She knew that her membership would give her credibility in the minds of their readers. Precisely because she was an ex-member, she knew that she would be able to impart upon her stories an air of truth that a member of the general public would not possess.

78. Defendants had *motive*. Each Defendant had a vendetta against the Church. Defendant Colón, in particular, felt that the church had destroyed her family and taken her husband from her. In an attempt to get the church to "let him go" as she put it, she crossed the line from fair, honest discourse to publishing damaging falsehoods.

79. Defendants were in the best possible position to know the falsity of their statements. In their zeal to "free" Plaintiff Ortiz and defame the Church, however, they chose to disregard the truth, intentionally or at least with knowledge of the substantial likelihood that they were wrong.

AS AND FOR A FIRST CAUSE OF ACTION
(Defamation and Conspiracy as to Plaintiff World Mission)

80. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

81. Defendant Colón made defamatory statements in the Local.com Post, the Yellowbot.com Post, the LATimes.com Post, the Aidpage.com Post, the Kudzu.com Post, the Socialcurrent.com Post, the Chamberofcommerce.com Post, the Google.com Post, the Rick Ross Forum Post, the Examining Articles, the PVSA Article, the Destroys Families Video, the Variance Hearing Statements and the Financial Info Video.

82. Defendant Newton made defamatory statements in the Facebook Post.

83. Defendant Newton and Defendant Colón each made and conspired to make defamatory statements in in the Examining Articles and the PVSA Articles. Defendant Colón submitted to Defendant Newton for publication, and Defendant Newton published, these statements on Defendant Newton's website. Defendant Newton adopted and represented the truth of these statements, reviewed the statements and also added his own commentary.

84. These statements were false and communicated to millions of people via the internet at large, especially to those who would search for information on Plaintiff World Mission.

85. As set forth, *supra*, they were made with malice.

86. Defendants have directly and proximately caused reputational damage in that these statements have lowered Plaintiff World Mission's reputation in the minds of its members, its community and the public at large. These statements have deterred third persons, including potential members and donors, from associating with it.

87. Defendants have directly and proximately caused pecuniary damage in that these statements have diminished Plaintiff World Mission's membership growth, thereby diminishing the donative revenue Plaintiff World Mission receives from its members.

AS AND FOR A SECOND CAUSE OF ACTION
(Defamation as to Plaintiff Ortiz)

88. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

89. Defendant Colón made the Statements to Mrs. Ortiz and the Variance Hearing Statements.

90. These statements were false.

91. As set forth, *supra*, they were made with malice.

92. Defendant Colón has directly and proximately caused reputational damage to Plaintiff Ortiz in that these statements have lowered Plaintiff Ortiz's estimation in the mind of his mother and his family. Plaintiff Ortiz's religious beliefs are unfamiliar to many, and so to avoid persecution for them, he kept them closely guarded. Fearing false attacks on his beliefs, he did not make a habit of reporting his religious affiliation to people he was not close with. Indeed, much of his own family did not know of his affiliation with the Church. Now, Defendant Colón has not only revealed his religious affiliation to those Plaintiff Ortiz did not want it revealed, she has done so on false and egregious terms from which Plaintiff Ortiz's reputation may never recover.

AS AND FOR A THIRD CAUSE OF ACTION

(False Light/Defamation by Implication and Conspiracy as to Plaintiff World Mission)

93. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

94. Defendant Colón made statements in the Local.com Post, the Yellowbot.com Post, the LATimes.com Post, the Aidpage.com Post, the Kudzu.com Post, the Socialcurrent.com Post, the Chamberofcommerce.com Post, the Google.com Post, the Rick Ross Forum Post, the Examining Articles, the PVSA Article, the Destroys Families Video, the Variance Hearing Statements and the Financial Info Video.

95. Defendant Newton made statements in the Facebook Post.

96. Defendant Newton and Defendant Colón each made and conspired to make statements in in the Examining Articles and the PVSA Articles. Defendant Colón submitted to Defendant Newton for publication, and Defendant Newton published, these statements on Defendant Newton's website. Defendant Newton adopted and represented the truth of these statements, reviewed the statements and also added his own commentary.

97. These statements were communicated to millions of people via the internet at large, especially to those who would search for information on Plaintiff World Mission.

98. As set forth, *supra*, in detail for each statement, these statements put Plaintiff World Mission in a false light that would be highly offensive to a reasonable person.

99. As set forth, *supra*, in detail, Defendants acted with malice, had knowledge of the falsity of their statements, or, at minimum, acted with reckless disregard as to the falsity of the statements and the light in which Plaintiff World Mission would be placed.

100. Defendants have directly and proximately caused reputational damage in that these statements have lowered Plaintiff World Mission's reputation in the minds of its members, its community and the public at large. These statements have deterred third persons, including potential members and donors, from associating with it.

101. Defendants have directly and proximately caused pecuniary damage in that these statements have diminished Plaintiff World Mission's membership growth, thereby diminishing the donative revenue Plaintiff World Mission receives from its members.

AS AND FOR A FOURTH CAUSE OF ACTION
(False Light/Defamation by Implication and Conspiracy as to Plaintiff Ortiz)

102. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

103. Defendant Colón made the Statements to Mrs. Ortiz and the Variance Hearing Statements.

104. As set forth in detail, *supra*, these statements put Plaintiff Ortiz in a false light that would be highly offensive to a reasonable person.

105. As set forth, *supra*, in detail, Defendant Colón acted with malice, had knowledge of the falsity of their statements, or, at minimum, acted with reckless disregard as to the falsity of the statements and the light in which Plaintiff World Mission would be placed.

106. Defendants have directly and proximately caused reputational damage to Plaintiff Ortiz in that these statements have lowered Plaintiff Ortiz's estimation in the mind of his mother and his family. As set forth in detail, supra, Defendant Colón has "outed" Plaintiff Ortiz on false terms from which he may never recover.

AS AND FOR A FIFTH CAUSE OF ACTION
(Trade Libel as to Plaintiff World Mission)

107. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

108. As a non-profit organization, Plaintiff World Mission depends on revenue generated from the donations of its members and other benefactors to pursue its good works in the community, to and for the continuation of its mission.

109. Defendant Colón made false statements in the Local.com Post, the Yellowbot.com Post, the LATimes.com Post, the Aidpage.com Post, the Kudzu.com Post, the Socialcurrent.com Post, the Chamberofcommerce.com Post, the Google.com Post, the Rick Ross Forum Post, the Examining Articles, the PVSA Article, the Destroys Families Video, the Variance Hearing Statements and the Financial Info Video.

110. Defendant Newton made false statements in the Facebook Post.

111. Defendant Newton and Defendant Colón each made and conspired to make false statements in in the Examining Articles and the PVSA Articles. Defendant Colón submitted to Defendant Newton for publication, and Defendant Newton published, these statements on Defendant Newton's website. Defendant Newton adopted and represented the truth of these statements, reviewed the statements and also added his own commentary.

112. These statements were false and were communicated to millions of people via the internet at large, especially to those who would search for information on Plaintiff World Mission.

113. As set forth, *supra*, in detail, Defendants acted with malice, had knowledge of the falsity of their statements, or, at minimum, acted with reckless disregard as to the falsity of the statements and the light in which Plaintiff World Mission would be placed.

114. These statements are of a kind designed to prevent members, potential members and donors from dealing with Plaintiff World Mission or otherwise designed to interfere with Plaintiff World Mission's relations with others. Defendants published these statements with this express purpose.

115. Defendants have directly and proximately caused reputational damage in that these statements have lowered Plaintiff World Mission's reputation in the minds of its members, its community and the public at large. These statements have deterred third persons, including potential members and donors, from associating with it.

116. Defendants have directly and proximately caused pecuniary damage in that these statements have diminished Plaintiff World Mission's membership growth, thereby diminishing the donative revenue Plaintiff World Mission receives from its members.

AS AND FOR A SIXTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress as to Plaintiff Ortiz)

117. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

118. Defendant Colón made false statements in the Local.com Post, the Yellowbot.com Post, the LATimes.com Post, the Aidpage.com Post, the Kudzu.com Post, the Socialcurrent.com Post, the Chamberofcommerce.com Post, the Google.com Post, the Rick Ross Forum Post, the Examining Articles, the PVSA Article, the Destroys Families Video, the Variance Hearing Statements and the Financial Info Video.

119. Defendant Newton made false statements in the Facebook Post.

120. Defendant Newton and Defendant Colón each made and conspired to make false statements in in the Examining Articles and the PVSA Articles. Defendant Colón submitted to Defendant Newton for publication, and Defendant Newton published, these statements on Defendant Newton’s website. Defendant Newton adopted and represented the truth of these statements, reviewed the statements and also added his own commentary.

121. These statements were made intentionally, were false and were communicated to millions of people via the internet at large.

122. Defendant Colón duped Plaintiff Ortiz into attending the Attempted Deprogramming. She further made the Statements to Mrs. Ortiz and the Variance Hearing Statements, causing Plaintiff Ortiz and his religious beliefs – which he had not shared with them – to be “outed” and revealed to his family on false and damaging terms.

123. Defendants took these acts specifically to place Plaintiff Ortiz in such emotional distress that he would leave the Church. Indeed, Defendant Colón specifically stated to the Church’s Pastor: “All of your secrets will be revealed to your congregation if you do not let him go.”

124. Taken together, Defendants’ campaign of religious persecution constitutes extreme and outrageous conduct that directly and proximately caused Plaintiff Ortiz emotional distress so severe that a reasonable person could not be expected to endure it.

AS AND FOR A SEVENTH CAUSE OF ACTION
(Breach of Contract as to Plaintiff World Mission)

125. Plaintiffs repeat and reallege all allegations as if set forth more fully herein.

126. On or about September 4, 2010, the Church and Defendant Colon entered into the Church of God Member Agreement (the “Agreement”).

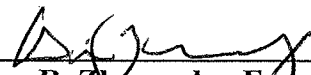
127. In the Agreement, Defendant Colon agreed not to disclose any “information whatsoever relating to her attendance, membership, [or] teaching” at the Church.

128. Defendant Colon breached this provision by making statements in the Local.com Post, the Yellowbot.com Post, the LATimes.com Post, the Aidpage.com Post, the Kudzu.com Post, the Socialcurrent.com Post, the Chamberofcommerce.com Post, the Google.com Post, the Rick Ross Forum Post, the Examining Articles, the PVSA Article, the Destroys Families Video, the Variance Hearing Statements and the Financial Info Video that “related to” her attendance, membership or teaching at the Church.

129. As a result, the Church has been damaged in an amount to be determined at trial.

**Dated: New York, New York
April 24, 2013**


NESENOFF & MILTENBERG, LLP

By: 
Diana R. Zborovsky, Esq.
Andrew T. Miltenberg, Esq.
Marco A. Santori, Esq.
Attorneys for Plaintiffs
363 Seventh Avenue, Fifth Floor
New York, New York 10001
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NOTICE OF DESIGNATION OF TRIAL COUNSEL

Plaintiff designates Andrew T. Miltenberg as counsel to try this action on its behalf.

Dated: April 23, 2013


Diana R. Zborovsky

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: April 23, 2013


Diana R. Zborovsky



FOXTONS, INC., Plaintiff-Appellant, v. CIRRI GERMAIN REALTY and SANTO CIRRI, Defendants-Respondents.

DOCKET NO. A-6120-05T3

SUPERIOR COURT OF NEW JERSEY, APPELLATE DIVISION

2008 N.J. Super. Unpub. LEXIS 189

**September 19, 2007, Argued
February 22, 2008, Decided**

NOTICE: NOT FOR PUBLICATION WITHOUT THE APPROVAL OF THE APPELLATE DIVISION.

PLEASE CONSULT NEW JERSEY RULE 1:36-3 FOR CITATION OF UNPUBLISHED OPINIONS.

PRIOR HISTORY: [*1]

On appeal from the Superior Court of New Jersey, Law Division, Middlesex County, Docket No. L-1421-06.

COUNSEL: Monica A. Brescia argued the cause for appellant (Kenny, Stearns & Zonghetti, attorneys; Gino A. Zonghetti and Ms. Brescia, on the brief).

Robert M. Brigantic argued the cause for respondents, Cirri Germain Realty and Santo Cirri (Maloof, Lebowitz, Connahan & Oleske, attorneys; Jack A. Maloof, on the brief).

JUDGES: Before Judges AXELRAD, SAPP-Peterson and MESSANO.

OPINION

PER CURIAM

Plaintiff Foxtons, Inc. (Foxtons) appeals from the motion judge's order of June 27, 2006, dismissing its complaint against defendants Cirri Germain Realty and Santo Cirri. Foxtons contends that the motion judge mistakenly converted defendants' motion to dismiss for failure to state a claim, *R. 4:6-2(e)*, into a motion for summary judgment, *R. 4:46*, because no discovery had taken place. It further argues that the motion judge erroneously applied the standards governing a motion to dismiss concluding its complaint was insufficient as a matter of law.

We have considered these arguments in light of the motion record and applicable legal standards. We affirm.

This lawsuit arose from a single letter or flyer (the flyer) admittedly [*2] drafted and circulated on February 1, 2006, by defendants, a licensed real estate agency and its principal. Prepared on the agency's letterhead, and signed by Santo Cirri, the flyer in its entirety read:

The Misleading 6% vs. 3% Commission Myth

Dear Home Owner:

Please don't be fooled with the advertised concept that there is a 3% saving in real estate commission fees that will put *thousands of dollars in your pocket!*

Keep in mind commissions by law are negotiable. There are no set fees. Claiming that most other offices charge 6% fees is ridiculous! Most offices do not charge what is asserted. So why then is this type of advertising continued? This is easy to answer, to mislead and to gain a competitive advantage over quality offices.

Most reputable offices will not emphasize or advertise that they too are full service, and will not place a commission fee and state full service on signs. Why? A highly regarded office doesn't have to! Remember all commissions are negotiable; *we evaluate each situation* and then discuss a fair commission fee that will generate maximum exposure by all agents in our Multiple Listing System.

Since home values have escalated, the real estate industry has overwhelmingly [*3] made adjustments in reducing fees to home owners. Most offices like ours today negotiate on an average 4.5%-5% commissions.

But if your house sits below towers or power lines, or adjacent to a busy highway, it's only logical to negotiate with your real estate agent a commission that will cause more agents to show your home.

Don't be fooled by the 3% commission, which offers 1% for agents to sell your home. Real estate agents must earn a living like anyone else. What is the likelihood of an experienced agent bringing their buyer to view a house for a 1% commission? Well the probability is not good at all, *extremely risky and time consuming to you*, which results in fewer showings, less offers and less money in your pocket.

Today homeowners and buyers are more prone to use an experienced well-trained real estate agent. Our sales staff for example averages 18 years of real estate experience.

Given honest facts, you decide what is best if you're looking to buy or sell a home. Feel free in calling our office. My agents have a wealth of information to help in your real estate needs.

Sincerely,

/s/

Santo Cirri

Plaintiff filed its complaint on February 9, 2006. Describing itself as a "full-service [*4] real estate brokerage" that offered the public a "discounted commission rate of three percent," plaintiff alleged defendants' flyer was defamatory and libelous per se, and it also sought damages under the theories of tortious interference with a prospective economic advantage and product disparagement. Although the complaint claimed to have attached a copy of the flyer and incorporated its contents "*pro hac verba*," no copy was attached and only limited snippets of its contents were recited in the pleading.

On May 5, 2006, defendants moved to dismiss the complaint for failure to state a claim and in support of

the motion attached three exhibits. The first was a complete copy of the flyer. The second exhibit, a reprint of a Wall Street Journal.com article dated September 20, 2004, noted plaintiff "recently announced that it [was] raising its standard commission to 3% from 2%." The third exhibit, a downloaded article from the Asbury Park Press dated February 6, 2005, quoted plaintiff's new executive officer, Van Davis, as stating, "The 2 percent model failed, and it failed in every respect of the word." He went on to explain that increasing the commission percentage to three percent would [*5] hopefully reinvigorate the company's financial outlook.

Defendants argued that the flyer was not defamatory because the statements it contained were merely opinions expressed by a competitor and were privileged speech. Defendants further contended that because the real estate business was highly regulated, plaintiff must plead actual malice in the publication of the flyer and had failed to do so.

Defendants further noted that the flyer never mentioned Foxtons by name. Relying upon the motion's exhibits which demonstrated plaintiff had recently changed its commission structure, defendants claimed that plaintiff had failed to demonstrate any exclusive relationship between itself and any particular commission rate--specifically the three percent rate referenced in the flyer. Defendants argued the complaint must fail as a matter of law because plaintiff could not demonstrate the allegedly defamatory statements were "of and concerning" plaintiff. Lastly, defendants contended that plaintiff failed to plead with the requisite specificity that it actually suffered damages as a result of the flyer's dissemination.

As to the two remaining counts of the complaint, defendants argued that the claim [*6] of tortious interference with a prospective economic advantage must fail because plaintiff failed to plead actual malice and specifically identify those "clients or transactions" that were lost because of the flyer's contents. Lastly, defendants contended plaintiff's product disparagement claim also must fail because plaintiff failed to plead with specificity the falsity of the flyer's statements, actual malice, or "special damages."

In a comprehensive written opinion that accompanied his order, the motion judge considered the arguments raised and plaintiff's opposition as to each of the three counts in the complaint. As to the defamation claim, the judge reasoned the complaint was inadequate for a number of reasons. First, he found that since the flyer never mentioned Foxtons by name, and because "plaintiff could not lay claim to exclusive identification with a particular commission rate," the complaint failed to establish that the defamatory statements "concern[ed]

the complaining party as required." Because "extrinsic facts [were] obviously necessary to draw some connection between the alleged defamatory statements and plaintiff," the flyer was not "defamatory per se," and plaintiff [*7] failed to adequately plead actual damages were suffered, instead, making only "conclusory allegations" of harm. He further found the complaint failed to "plead actual malice." Lastly, he reasoned that "[b]y actively taking a public position on the relative merits of discount brokers, plaintiff invited a public response," and could not complain if that consisted of "opinion, comment or criticism . . . adverse to its own views on the subject."

The judge then considered the remaining two counts of the complaint. As to the claim for tortious interference, he found that plaintiff had not sufficiently pled malice, or claimed that defendants' conduct was "legally wrongful . . . and not sanctioned by the rules of the game." With respect to the product disparagement claim, the judge determined plaintiff failed to allege malice, "failed to plead the publication of false allegations concerning its property, product or business, and special damages." He found defendants' statements were "intended to persuade potential customers to use the competitor's services rather than those of plaintiff," and concluded, "By commencing this litigation, plaintiff seeks to be able to comment on commission rates [*8] and level of service while attempting to foreclose [defendants'] *First Amendment* rights from doing the same." The judge entered an order dismissing the complaint in its entirety, and this appeal followed.

We first consider plaintiff's claim that the judge erroneously converted defendants' motion to dismiss into one for summary judgment. While conceding that this procedure is specifically provided for by *Rule 4:6-2*, plaintiff argues that it was unfairly utilized in this case because no discovery whatsoever had taken place.

The materials supporting defendants' motion were submitted to prove a single fact--that plaintiff had only recently raised its own commission rates from two to three percent. Therefore, it was defendants' argument that the flyer which referred to "the 3% commission," a phrase plaintiff claims to extensively employ in its advertising, would not be understood by anyone reading it necessarily as a reference to plaintiff. In short, defendants argued, and the motion judge found, "plaintiff could not lay claim to exclusive identification with a particular commission rate," and therefore could not demonstrate the flyer was "of or concerning" Foxtons. See *Durski v. Chaneles*, 175 N.J. Super. 418, 420, 419 A.2d 1134 (App. Div.) (holding [*9] that "[a]n indispensable prerequisite to an action for defamation is that the [] statements must be of and concerning the complaining party"), *certif. denied*, 85 N.J. 146, 425 A.2d 298 (1980).

Plaintiff acknowledges the flyer did not contain its name but contends that with further discovery, it could have demonstrated that those reading the flyer would have known it was about Foxtons. We note that plaintiff's objection below to the conversion of the motion to one seeking summary judgment was cursory at best. *Instead, in opposition to the motion, it furnished its own exhibits*, a copy of the National Association of Realtors' Code of Ethics, and an unreported Appellate Division decision, but nothing else.

At oral argument before us, plaintiff conceded that it did not seek an adjournment of the motion to furnish other materials or otherwise specifically demonstrate how further discovery was important to resisting defendant's motion. See *R. 4:6-2* (permitting all parties "a reasonable opportunity to present all material pertinent to such a motion"). Plaintiff posited no other reason--beyond the need to demonstrate the flyer was "of and concerning" Foxtons--why discovery was necessary to resist defendants' [*10] motion.

In *Dijkstra v. Westerink*, we noted, "[T]he actual naming of plaintiff is not a necessary element in an action for libel. It is enough that there is such reference to him that those who read or hear the libel reasonably understand the plaintiff to be the person intended." 168 N.J. Super. 128, 133, 401 A.2d 1118 (App. Div.) (citing *Restatement (Second) of Torts*, § 564 comment a (1977)), *certif. denied*, 81 N.J. 329, 407 A.2d 1203 (1979). Additionally, if the defamatory comment fails to mention any specific name but is directed toward a group or class of individuals, a plaintiff may still establish a claim for libel. *Mick v. American Dental Asso.*, 49 N.J. Super. 262, 285, 139 A.2d 570 (App. Div.), *certif. denied*, 27 N.J. 74, 141 A.2d 318 (1958). Under such circumstances, a successful plaintiff must show "he is a member of the defamed class and must establish some reasonable application of the words to himself." *Ibid.*

We accept plaintiff's contention that further discovery on this sole issue could have adduced sufficient facts to demonstrate it was the flyer's intended target. For example, it may have been able to demonstrate that its advertising was uniquely identifiable by the public, or that the population that received the flyer was [*11] targeted to overlap a geographical area where its own efforts were extensive and without significant other competition.

It is clear to us, however, that with the exception of the flyer itself, the motion judge did not rely on the other exhibits attached to defendants' motion to decide the issue. Instead, he applied the standards of review that govern a motion to dismiss under *Rule 4:6-2(e)*. Our review, therefore, employs the same standard as the trial court. *Sickles v. Cabot Corp.*, 379 N.J. Super. 100, 106, 877

A.2d 267 (App. Div.), certif. denied, 185 N.J. 297, 884 A.2d 1267 (2005).

A motion to dismiss under *Rule 4:6-2(e)* should be "approach[ed] with great caution" and should only be granted in "the rarest of instances." *Printing Mart-Morristown v. Sharp Elec. Corp.*, 116 N.J. 739, 771-72, 563 A.2d 31 (1989). We view the allegations in the complaint with liberality and without concern for the plaintiff's ability to prove the facts alleged in the complaint. *Id.* at 746. "A motion to dismiss a complaint under *Rule 4:6-2(e)* for failure to state a claim upon which relief can be granted must be evaluated in light of the legal sufficiency of the facts alleged in the complaint." *Donato v. Moldow*, 374 N.J. Super. 475, 482, 865 A.2d 711 (App. Div. 2005). [*12] The plaintiff's obligation on a motion to dismiss is "not to prove the case but only to make allegations, which, if proven, would constitute a valid cause of action." *Leon v. Rite Aid Corp.*, 340 N.J. Super. 462, 472, 774 A.2d 674 (App. Div. 2001).

In defamation actions, which by their nature implicate the potential curtailment of cherished freedoms of expression, a plaintiff must plead its cause of action with a greater level of specificity. *Darakjian v. Hanna*, 366 N.J. Super. 238, 248-49, 840 A.2d 959 (App. Div. 2004). As the Supreme Court has noted,

In addition to alleging defamatory statements, the complaint must plead facts sufficient to identify the defamer and the circumstances of publication. Also, the circumstances must show that the statements are "of and concerning" plaintiff. It must appear that a third person understood the statements to relate to the plaintiffs.

It is not enough for plaintiffs to assert . . . that any essential facts that the court may find lacking can be dredged up in discovery. A plaintiff can "bolster a defamation cause of action through discovery, but not [] file a conclusory complaint to find out if one exists." *Zoneraich v. Overlook Hosp.*, 212 N.J. Super. 83, 101-02, 514 A.2d 53 (App. Div.), [*13] certif. denied, 107 N.J. 32, 526 A.2d 126 (1986) [A] plaintiff must plead the facts and give some detail of the cause of action.

[*Printing Mart-Morristown*, supra, 116 N.J. at 767-768 (emphasis added)(other internal citations omitted).]

In other words, it was plaintiff's significant burden to plead with specificity sufficient facts to demonstrate that the flyer was "of and concerning" Foxtons without any further discovery. This it clearly failed to do.

Plaintiff's complaint claimed that "[r]easonable persons of ordinary intelligence who read defendants' libelous writing could only understand that plaintiff was the sole target." But, there were no facts asserted to support that rather broad claim. For example, though not a mandatory requirement, the complaint did not assert that any specific third party thought the flyer was referring to Foxtons. At most, the complaint contained a general statement that "upon information and belief [Foxtons is] the only real estate brokerage concern in New Jersey that actively markets and advertises itself as providing 'full service' . . . at a discounted commission rate of '3%'."

Plaintiff pled no facts to support its belief as to the exclusivity of its marketing [*14] campaign. In fact, as defendants have argued, real estate commissions are by law entirely negotiable. Therefore, it is difficult to imagine how one could claim that a reference to a particular commission rate in the flyer could be interpreted as applying only to plaintiff. We note plaintiff's own belief that it was the flyer's intended target is insufficient; the test is whether reasonable third parties who read the flyer would surmise it referred to Foxtons. *See Taj Mahal Travel v. Delta Airlines*, 164 F.3d 186, 189 (3d. Cir. 1999) (reviewing court must place itself "in the position of the expected reader" to determine whether the alleged defamatory statement sufficiently identifies plaintiff).

We also agree with the motion judge that the contents of the flyer were not defamatory but were rather fair comment by a competitor extolling the virtues of its own services in comparison to those provided by other brokers. Whether a statement is defamatory is a matter of law to be determined by the court. *Dello Russo v. Nagel*, 358 N.J. Super. 254, 262, 817 A.2d 426 (App. Div. 2003). "When determining if a statement is defamatory on its face 'a court must scrutinize the language according to the fair and natural [*15] meaning which will be given it by reasonable persons of ordinary intelligence.'" *Id.* at 263 (quoting *Romaine v. Kallinger*, 109 N.J. 282, 290, 537 A.2d 284 (1988)). In deciding whether a statement is defamatory a court examines its content, verifiability, and context. *Ibid.* In *Nagel*, we explained:

[First, a] statement's content is judged by its objective meaning to a reasonable person of ordinary intelligence. Secondly, only verifiable statements can be defamatory. Finally, a statement's meaning can be affected by its context. The focus is on the effect of the alleged defamatory statement on third persons, that is, wheth-

er they viewed the plaintiff in a lesser light as a result of hearing or reading the offending statement.

[*Nagel*, 358 N.J. Super. at 263-64 (citations omitted).]

"In assessing the language, the court *must view the publication as a whole* and consider particularly the context in which the statement appears." *Romaine*, *supra*, 109 N.J. at 290 (emphasis added).

Plaintiff's complaint cited five specific portions of the flyer's contents and alleged these were defamatory. In each instance, however, those allegations were taken out of the full context of the flyer or otherwise recited in incomplete [*16] fashion. As we noted above, plaintiff failed to include the flyer as an exhibit to the complaint.

As a result, this truncated version of the flyer's contents unfairly skews its overall thrust--that contrary to plaintiff's assertions, defendants were willing to negotiate their commission charges, frequently agreeing to accept less than six percent, and that defendant's fee structure and experience would more likely produce a sale for the client.

Whether the flyer's allegedly defamatory statements are "verifiable" requires an examination of whether they reflect facts or opinions. "Factual statements, unlike non-factual statements, are uniquely capable of objective proof of truth or falsity. Opinion statements, in contrast, are generally not capable of proof of truth or falsity because they reflect a person's state of mind." *Ward v. Zelikovsky*, 136 N.J. 516, 530-31, 643 A.2d 972 (1994). "Harm from a defamatory opinion statement is redressable when the statement implies underlying objective facts that are false." *Id.* at 531.

It is clear from a review of the entire flyer that by and large it contains expressions of defendants' opinions regarding the value of its services and those offered by others claiming [*17] to charge a lesser commission rate. Our Supreme Court has noted that boasts of a competitor concerning the prices of goods and services offered and their value are not defamatory. *See Printing Mart-Morristown*, *supra*, 116 N.J. at 767 (1989).

These observations also inform our consideration of the context of defendants' statements, which helps us ascertain how a reasonable person would interpret the flyer. *Ward*, *supra*, 136 N.J. at 532. The flyer was circulated on defendants' agency stationary and signed by Cirri himself. Plaintiff's complaint alleges it was mailed to "consumers in, among other areas, Middlesex County." We note defendants' place of business is Edison, which is located in that county. Therefore, the context of

the flyer's dissemination further supports the conclusion that it was in the nature of a solicitation of prospective customers with which defendants sought to place a positive spin on their own virtues, and that it was not defamatory.

We therefore affirm the motion judge's dismissal of plaintiff's defamation claim without considering the other reasons set forth in his written opinion.

Plaintiff argues that its complaint adequately stated a claim for tortious interference [*18] with prospective economic advantage. To establish such a claim, a plaintiff must prove: 1) actual interference with a contract; 2) that the interference was inflicted intentionally by a defendant who is not a party to the contract; 3) that the interference was without justification; and 4) that the interference caused damage. *Nagel*, *supra*, 358 N.J. Super. at 268. Interference with a contract is intentional "if the actor desires to bring it about or if he knows that the interference is certain or substantially certain to occur as a result of his action." *Id.* at 268 (citing *Restatement (Second) of Torts*, § 766A comment e (1977)).

However, the fact that a party acted to advance its own interest and financial position does not establish the necessary malice or wrongful conduct. *Ibid.* A claim for tortious interference with the performance of a contract must be based on

facts claiming that the interference was done intentionally and with 'malice'. . . . For purposes of this tort, '[t]he term malice is not used in the literal sense requiring ill will toward plaintiff' . . . Rather, malice is defined to mean that the harm was inflicted intentionally and without justification or excuse.

[*Id.* at 269 [*19] (citing *Printing Mart-Morristown*, *supra*, 116 N.J. at 751).]

When a business targets its competitor's customers, it exercises a valid business judgment and that alone does not constitute tortious interference with prospective economic advantage. *Nagel*, *supra*, 358 N.J. Super. at 268. Rather, a plaintiff must demonstrate the defendant's "conduct was [not] sanctioned by the 'rules of the game,' for where a plaintiff's loss of business is merely the incident of healthy competition, there is no compensable tort injury." *Lamorte Burns & Co. v. Walters*, 167 N.J. 285, 306, 770 A.2d 1158 (2001)(quoting *Ideal Dairy Farms, Inc. v. Farmland Dairy Farms, Inc.*, 282 N.J. Super. 140, 199, 659 A.2d 904 (App. Div.), *certif. denied*, 141 N.J. 99, 660 A.2d 1197 (1995)).

Although plaintiff's complaint alleged defendants "acted intentionally and without justification of excuse," precisely the terms we used to define malice in *Ideal Dairy Farms, ibid.*, it fails to set forth any facts regarding defendants' conduct other than the publication of the flyer. Considering our prior discussion, we agree with the motion judge that plaintiff's complaint failed to plead with sufficient specificity the acts of defendants demonstrating malice and therefore the claim [*20] for tortious interference with a prospective economic advantage was properly dismissed.

Lastly, plaintiff argues that it sufficiently pled a prima facie claim for trade libel. The elements of trade libel are: 1) publication; 2) with malice; 3) of false allegations concerning plaintiff's property, product or business; and 4) special damages--pecuniary harm. *Mayflower Transit, L.L.C. v. Prince*, 314 F. Supp. 2d 362, 378 (2004). Even a most liberal reading of this count of plaintiff's complaint demonstrates a complete failure to allege that defendants acted with malice. We therefore affirm the motion judge's decision to dismiss this count of plaintiff's complaint.

Affirmed.



ART OF LIVING FOUNDATION, Plaintiff, v. DOES 1-10, Defendants.

Case No.: 10-CV-05022-LHK

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA, SAN JOSE DIVISION**

2011 U.S. Dist. LEXIS 63507; 39 Media L. Rep. 2520

June 15, 2011, Decided

June 15, 2011, Filed

SUBSEQUENT HISTORY: Motion granted by, in part, Motion denied by, in part *Art of Living Found. v. Does*, 2011 U.S. Dist. LEXIS 88793 (N.D. Cal., Aug. 10, 2011)

COUNSEL: [*1] For Art of Living Foundation, a California corporation, Plaintiff: Karl Stephen Kronenberger, LEAD ATTORNEY, Jeffrey Michael Rosenfeld, San Francisco, CA.

For Does 1-10, Defendant: Joshua Kathriel Koltun, LEAD ATTORNEY, Joshua Koltun Attorney, San Francisco, CA.

JUDGES: LUCY H. KOH, United States District Judge.

OPINION BY: LUCY H. KOH

OPINION

ORDER GRANTING MOTION TO DISMISS AND DENYING MOTION TO STRIKE

(re: dkt. #26 and #27)

It has long been settled that an author's decision to remain anonymous is an aspect of freedom of speech protected by the *First Amendment*. The right to speak anonymously, however, is not unlimited. This case centers on the contours of balancing the *First Amendment* rights of online authors' decisions to speak anonymously and critically of an organization against the claims of the organization that the speech is simply the false and malicious rants of disgruntled former students and teachers.

Plaintiff Art of Living Foundation is a California non-profit corporation, and is the United States branch for the international Art of Living Foundation based in

Bangalore, India. Plaintiff is dedicated to teaching the wellness and spiritual lessons of Ravi Shankar, the founder of the Art of Living Foundation. [*2] Defendants Doe Skywalker and Doe Klim are former adherents of the Art of Living Foundation, but are now critical of both the Foundation and Shankar. Plaintiff alleges that Defendants have posted defamatory statements on blogs, published trade secrets, and infringed copyrighted materials. Defendants, appearing specially via counsel, have moved to dismiss for lack of personal jurisdiction, and for failure to state a claim with respect to the defamation and trade libel claims. Defendants have also filed a motion to strike the defamation, trade libel, and trade secrets claims under *California Code of Civil Procedure* § 425.16 (California Anti-SLAPP Statute). The Court held a hearing on Defendants' motions on May 26, 2011. For the reasons explained below, Defendants' motion to dismiss for lack of personal jurisdiction is DENIED. Defendants' motion to dismiss the defamation and trade libel claims for failure to state a claim is GRANTED with leave to amend. Defendants' motion to strike the defamation, trade libel, and trade secrets claim is DENIED WITHOUT PREJUDICE. However, discovery on the trade secrets claim may not proceed until Plaintiff identifies the trade secrets with reasonable particularity.

I. [*3] BACKGROUND

A. The Parties

The Art of Living Foundation is an international educational and humanitarian organization based in Bangalore, India, but with chapters in more than 140 countries. Compl. ¶¶ 1, 21. The Art of Living Foundation was founded by "His Holiness Sri Sri Ravi Shankar" in 1981. *Id.* at ¶ 16. Plaintiff here, also called Art of Living

Foundation (Plaintiff or "AOLF-US"), is a California nonprofit corporation based in Goleta, California and is the United States chapter of the international Foundation. *Id.* at ¶¶ 2, 13. Plaintiff offers courses that employ breathing techniques, meditation, and yoga, focusing on "Sudarshan Kriya," an ancient form of stress and health management via rhythmic breathing. *Id.* at ¶ 3.

Defendants are Does, but have specially appeared through counsel under their blogger names of "Skywalker" and "Klim." Plaintiff alleges that Defendants are "disgruntled student-teacher and/or students of Plaintiff, AoL [Art of Living Foundation], and/or Ravi Shankar." *Id.* at ¶ 52. In or around November 2009, Defendants started the blog called "Leaving the Art of Living," located at artoflivingfree.blogspot.com. *Id.* at ¶ 53. In or around November 2010, Defendants started [*4] the blog called "Beyond the Art of Living," located at aolfree.wordpress.com. *Id.* at ¶ 54.

B. AOLF-US's Allegations and Claims

Plaintiff alleges that an essential component of its practice is the training of teachers. *Id.* at ¶ 34. These teaching methods are contained in several written manuals, including: the Training Guide Phase One; the Continuation Manual; and the Yes! Teacher Notes. *Id.* at ¶ 39. However, Plaintiff alleges that the teaching methods for the "Sudarshan Kriya" have intentionally not been memorialized in writing and are kept "strictly confidential." Plaintiff alleges that although the ostensible purpose of Defendants' blogs is to provide a forum for former students/adherents of Art of Living, Defendants really use the Blogs to defame Plaintiff, misappropriate Plaintiff's trade secrets, and infringe on Plaintiff's copyright materials." *Id.* at ¶¶ 56-58.

Specifically, Plaintiff's first claim is that Defendants committed copyright infringement by publishing the Breathe Water Sound Manual on the blogs. *Id.* at ¶¶ 75-88. Plaintiff alleges that it first published the Breathe Water Sound Manual on June 1, 2003. Plaintiff has applied to the Copyright Office for registration of the [*5] Manual, and has not licensed the Manual's use to Defendants. *Id.*

Plaintiff's second claim is that its teaching Manuals and teaching processes for "Sudarshan Kriya" (the latter of which is intentionally not written down) are trade secrets. *Id.* at ¶¶ 89-107. Plaintiff submits that the Manuals and teaching processes have independent economic value (i.e., Plaintiff charges students for lessons based on the Manuals and teaching processes) and that Plaintiff engages in diligent efforts to keep the information confidential. *Id.* at ¶¶ 94-96. Plaintiff alleges that Defendants agreed to keep the trade secrets confidential, but then used the information to instruct students without author-

ization. *Id.* at ¶ 98. Moreover, Plaintiff continues, Defendants published the confidential Manuals on their blogs, and hyperlinked to another website that had a written summary of Plaintiff's teaching processes for "Sudarshan Kriya." *Id.* at ¶¶ 99-100. Defendant Skywalker concedes publishing the alleged trade secret documents and the Breath Water Sound Manual in June and July, 2010, but argues: (1) the documents are not actually trade secrets because they are well-known in the yoga community and are not kept strictly [*6] confidential; and (2) in any event, Skywalker's publication of the materials is protected by the *First Amendment* because it arises from free speech on a "public issue." *See* Defs.' Mot. to Strike at 2, 12.

Plaintiff's third claim is that Defendants use the blogs to intentionally disparage and defame Plaintiff, the Art of Living Foundation, and Ravi Shankar. *Id.* at ¶ 62 (providing list of 18 alleged examples of defamatory statements on the blogs). For example, one statement on one of the blogs is: "The truth is more disgruntled people should come out to do something about all the illegal activities that occur thru and in his organization, ranging from exploitation, to swindling, to cheating, to physical abuse, to sexual harassment and fondling, etc." *Id.* Another statement is: "Again answer is obvious, the master is a charlatan (is a person practising quackery or some similar confidence trick in order to obtain money) in disguise." *Id.* And: "The 'dollar a day' program was started in the US. The money never went to that cause."

Finally, Plaintiff's fourth claim that Defendants have committed trade libel because their disparaging statements have attacked Plaintiff's teaching methods and services, [*7] and have discouraged other potential students from registering for Plaintiff's courses. *Id.* at ¶¶ 116-121.

In its prayer for relief, Plaintiff seeks monetary damages and injunctive relief "restraining Defendants from operating the Blogs and requiring that the Blogs be removed the Internet." *Id.* at p. 19 ("Prayer for Relief").

II. DISCUSSION

A. Motion to Dismiss for Lack of Personal Jurisdiction

Defendants move to dismiss for lack of personal jurisdiction pursuant to *Federal Rule of Civil Procedure 12(b)(2)*. Specifically, Defendants allege: (1) that Plaintiff has not alleged personal jurisdiction over any of the Defendants in the Complaint; and (2) that neither Defendant Skywalker nor Defendant Klim are citizens of the United States, let alone California. Plaintiff responds that there are sufficient contacts between Defendants and California to make personal jurisdiction reasonable, es-

pecially in light of the "harmful effects" felt by Plaintiff in California.

1. Legal Standard

In order to establish personal jurisdiction, a plaintiff must first show that the forum state's jurisdictional statute confers personal jurisdiction over defendants, and that the exercise of such jurisdiction "accords [*8] with federal constitutional principles of due process." *Federal Deposit Ins. Corp. v. British-American Ins. Co., Ltd.*, 828 F.2d 1439, 1441 (9th Cir. 1987). California's "long-arm" statute extends jurisdiction to the maximum extent permitted by due process. See *Cal. Civ. Proc. § 410.10*. Accordingly, the jurisdictional inquiries under state law and constitutional due process principles can be conducted simultaneously. In the Ninth Circuit, a three-part test is applied to determine whether specific jurisdiction may be exercised over a defendant consistent with due process principles: (1) The nonresident defendant must do some act or consummate some transaction with the forum or perform some act by which he purposefully avails himself of the privilege of conducting activities in the forum, thereby invoking the benefits and protections of its laws; (2) the claim must be one which arises out of or results from the defendant's forum-related activities; and (3) exercise of jurisdiction must be reasonable. See *Omeluk v. Langsten Slip & Batbyggeri A/S*, 52 F.3d 267, 270 (9th Cir. 1999). In the context of websites on the Internet, there has to be "something more" [than a web-site] to indicate [*9] that the defendant purposefully (albeit electronically) directed his activity in a substantial way to the forum state." See *Panavision International, L.P. v. Toeppen*, 141 F.3d 1316, 1321 (9th Cir. 1998) (quoting *Cybersell, Inc. v. Cybersell, Inc.*, 130 F.3d 414, 418 (9th Cir. 1997)).

2. Analysis

Under the Ninth Circuit's "effects test" for tort actions of defamation, a court should consider whether defendants purposefully availed their activities at the forum state or whether defendants should have known that the "effects" of their actions would be felt in the forum state. See *Gordy v. Daily News, L.P.*, 95 F.3d 829, 835 (9th Cir. 1996) (finding personal jurisdiction in California over out-of-state defendants where defendants published defamatory article about California resident and circulated article to only 13-18 subscribers in California); see also *Nicosia v. De Rooy*, 72 F. Supp. 2d 1093, 1097-99 (N.D. Cal. 1999) (finding personal jurisdiction in a defamation action where defendant created a website with a defamatory article about a California resident and circulated e-mails to California residents).

Here, Plaintiff's Complaint, along with additional documentary evidence, establishes [*10] a prima facie

case of personal jurisdiction over Defendants. See *Harris Rutsky & Co. Ins. Servs. v. Bell & Clements Ltd.*, 328 F.3d 1122, 1129 (9th Cir. 2003) ("the plaintiff need only make a prima facie showing of jurisdiction to avoid the defendant's motion to dismiss"). Plaintiff is incorporated in California and is the Art of Living branch for the entire United States. In addition, certain critical statements by Defendants on the Blogs are, in part, directed at Plaintiff's activities in the United States and exhibit knowledge of Plaintiff's incorporation in California. See *Panavision Int'l, L.P. v. Toeppen*, 141 F.3d 1316 (9th Cir. 1998) (finding personal jurisdiction where out-of-state defendant's website postings injured plaintiff in California, where plaintiff had its principal place of business). In addition, the Blogs are hosted in California using northern California-based companies Google, Inc. (based in Mountain View, California) and Automatic, Inc. (based in Redwood City, California). Defendants, in creating and using the Blogs, agreed to terms and conditions with California choice of law and venue provisions.

Moreover, Plaintiff represents that its office, located in Goleta, [*11] California, has received multiple inquiries from individuals throughout the United States about the critical and negative statements on the Blogs. See *Nicosia*, 72 F. Supp. 2d at 1099 (in determining personal jurisdiction, a court looks to where the injury is felt); compare *Church of Scientology v. Adams*, 584 F.2d 893, 898-99 (9th Cir. 1978) (pre-dating "effects" test, finding no personal jurisdiction over out-of-state defendants where those defendants' statements did not concern or affect California residents). Significantly, there appears to be no other alternative forum state for Plaintiff, a California nonprofit corporation, to raise its claims because Defendants' United States contacts are centered in California. See *FDIC v. British-American Ins. Co.*, 828 F.2d 1439, 1442 (9th Cir. 1987) (an important factor in determining reasonableness of asserting jurisdiction over a non-resident defendant is the existence of an alternative forum). Finally, in addition to the allegedly defamatory statements posted on the Blogs hosted by northern California companies, Plaintiff alleges that Defendants have also published trade secrets and committed copyright infringement by publication of Plaintiff's [*12] confidential teaching materials. These allegations, combined with the allegations regarding defamation, establish the "something more" requirement necessary for assertion of personal jurisdiction. See *Cybersell*, 130 F.3d at 418.

Accordingly, the Court denies Defendants' motion to dismiss, pursuant to *Rule 12(b)(2) of the Federal Rules of Civil Procedure*, for lack of personal jurisdiction.

B. Motion to Dismiss Defamation and Trade Libel Claims

Aside from the jurisdictional challenge, Defendants have moved to dismiss the defamation and trade libel claims for failure to state a claim.¹ The Court begins with analysis of the allegations of defamation, which form the heart of the dispute between the parties.

1 Defendants have not moved to dismiss or strike Plaintiff's copyright claim. Thus, it is not at issue in these particular motions.

Defamation

Defendants offer four challenges to Plaintiff's defamation claim: (1) that they have an "absolute right" under the *First Amendment* to urge persons to avoid a religious organization; (2) that the alleged defamatory statements are not "of and concerning" Plaintiff (i.e., that the statements are not specifically targeted at the *United States branch* of the [*13] Art of Living Foundation, which has the same name as the international organization based in India); (3) that the statements are constitutionally protected "opinions" that are not actionable under defamation law; and (4) that Plaintiff is a "public figure," which triggers a higher actual malice standard to prove defamation.

1. Legal Standard

The elements of a defamation claim are (1) a publication that is (2) false, (3) defamatory, (4) unprivileged, and (5) has a natural tendency to injure or causes special damage. *Wong v. Jing*, 189 Cal. App. 4th 1354, 1369, 117 Cal. Rptr. 3d 747 (Cal. App. 6th Dist. 2010). *Civil Code section 45* provides, "Libel is a false and unprivileged publication by writing, printing, picture, effigy, or other fixed representation to the eye, which exposes any person to hatred, contempt, ridicule, or obloquy, or which causes him to be shunned or avoided, or which has a tendency to injure him in his occupation." "Statements that contain such a charge directly, and without the need for explanatory matter, are libelous per se. A statement can also be libelous per se if it contains a charge *by implication* from the language employed by the speaker and a listener could understand the defamatory [*14] meaning without the necessity of knowing extrinsic explanatory matter." *See Wong*, at 1369. Although potentially limited by the context of the statement, an allegation the plaintiff is guilty of a crime is generally libelous on its face and is actionable without proof of damages. *See Fashion 21 v. Coalition for Humane Immigrant Rights of Los Angeles*, 117 Cal. App. 4th 1138, 1145, 12 Cal. Rptr. 3d 493 (Cal. App. 2d Dist. 2004).

Whether a statement is an assertion of fact or opinion is a question of law for the court. *Dworkin v. Hustler Magazine, Inc.*, 867 F.2d 1188, 1193 (9th Cir. 1989). Pure opinions -- "those that do not imply facts capable of

being proved true or false" -- are protected by the *First Amendment*. *Partington v. Bugliosi*, 56 F.3d 1147, 1153 *fn.10* (9th Cir. 1995). Assertions of fact and statements that "may imply a false assertion of fact, however, are not protected." *Id.* To determine whether a statement implies an assertion of fact, the Ninth Circuit applies the following three-part test. First, a court reviews the statement in its "broad context," which includes the general tenor of the entire work, the subject of the statement, the setting, and the format of the work. Next, the court turns [*15] to the "specific context" and content of the statement, analyzing the extent of figurative or hyperbolic language used and the reasonable expectations of the audience in that particular situation. Finally, the court inquires whether the statement itself is sufficiently factual to be susceptible of being proved true or false. *See Underwager v. Channel 9 Australia*, 69 F.3d 361, 366 (9th Cir. 1995).

2. Analysis

a. No "Absolute Right" to Defame under *First Amendment*

Defendants' assertion that they have an "absolute right" to make defamatory statements about religious organizations misses the mark. As a preliminary matter, it is not clear that Plaintiff is a religious organization. According to the allegations in the Complaint, Plaintiff is a non-profit corporation that offers courses that employ breathing techniques, meditation, and yoga, focusing on "Sudarshan Kriya," an ancient form of stress and health management via rhythmic breathing. Compl. at ¶ 3. Moreover, the *First Amendment* does not protect "knowingly false" speech. *Solano v. Playgirl, Inc.*, 292 F.3d 1078, 1089 (9th Cir. 2002). It is correct that a religious organization's practice of "shunning" is protected by the *First Amendment*. [*16] *See Paul v. Watchtower Bible & Tract Soc.*, 819 F.2d 875, 880 (9th Cir. 1987). Here, even assuming Plaintiff is a religious organization, the allegedly defamatory statements at issue in the Complaint are not all directed at religious conduct or religious ideology, but are instead directed at business and financial practices and alleged criminal activity. *See Maktab Tarighe Oveyssi Shah Maghsoudi, Inc. v. Kianfar*, 179 F.3d 1244, 1250 (9th Cir. 1999) (courts may resolve disputes based on "neutral, secular principles," without impermissible entanglement into religious doctrine).

Accordingly, Defendants' motion to dismiss on this ground is denied.

b. Of and Concerning Plaintiff

The *First Amendment* requires a plaintiff to establish that the statement on which the defamation claim is based is "of and concerning" the plaintiff. *Blatty v. New*

York Times Co., 42 Cal. 3d 1033, 1042, 232 Cal. Rptr. 542, 547, 728 P.2d 1177 (1986). "However, when the statements concern groups, as here, plaintiffs face a more difficult and sometimes insurmountable task. If the group is small and its members easily ascertainable, plaintiffs may succeed. But where the group is large -- in general, any group numbering [*17] over twenty-five members -- the courts in California and other states have consistently held that plaintiffs cannot show that the statements were 'of and concerning' them." *Barger v. Playboy Enterprises*, 564 F. Supp. 1151, 1153 (N.D. Cal. 1983). The rationale for this rule is to protect freedom of public discussion, except to prevent defamatory statements *reasonably susceptible* of special application to a given individual. "In California, whether statements can be reasonably interpreted as referring to plaintiffs is a question of law for the court." See *SDV/ACCI*, 522 F.3d at 959 (citing *Alszev v. Home Box Office*, 67 Cal. App. 4th 1456, 80 Cal. Rptr. 2d 16, 18 (Cal. Ct. App. 1998)).

Here, Ravi Shankar would have a good argument that Defendants' statements are "of and concerning" him because the statements expressly mention his name numerous times. However, Plaintiff, which has the same name as the international organization (and presumably the same name as some 140 other international branches), has not established that the allegedly defamatory statements at issue, as opposed to the Blogs in general, are "of and concerning" AOL-US. See *SDV/ACCI*, 522 F.3d at 960 (establishing defamation [*18] requires more than ambiguous statements referring to a group). Most of the statements described in the Complaint only refer to "Art of Living," or to "teachers" or "lackeys" of Art of Living. For example, the statement "all the illegal activities that occur thru and in his organization, ranging from exploitation, to swindling, to cheating, to physical abuse, to sexual harassment and fondling, etc." (Compl. at ¶ 62) only refers to "his organization," while the statement "I am fully convinced that AOL is front-end name for a group of fraudulent NGOs. My lawyer tells me that what they are doing amounts to large-scale organized fraud according to the laws of several countries" does not clearly implicate the United States branch of the Art of Living Foundation, and appears focused on the international organization in India.

As currently pled, the allegations in the Complaint are insufficient to satisfy the "of and concerning" requirement of defamation law.

c. In Context, Statements are Constitutionally Protected Opinions

Under Ninth Circuit law, the Court must consider the broad context of the statements, the specific context of the statements, and whether the statement is sufficiently factual [*19] to be proved true or false. The

Court's review of these factors leads to the conclusion that the statements at issue are constitutionally protected opinions rather than verifiable facts.

In the broad context, the statements are made on obviously critical blogs ("Leaving Art of Living" and "Beyond Art of Living") with heated discussion and criticism of the Art of Living Foundation and Ravi Shankar. In this context, readers are less likely to view statements as assertions of fact rather than opinion. See *Nicosia*, 72 F. Supp. 2d at 1101 (N.D. Cal. 1999) (statements made on personal website, through Internet discussion groups, and as part of heated debate are less likely viewed as statements of fact). The *First Amendment* protects "statements that cannot 'reasonably [be] interpreted as stating actual facts' about an individual." *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 20, 110 S. Ct. 2695, 111 L. Ed. 2d 1 (1990) (quoting *Hustler Magazine v. Falwell*, 485 U.S. 46, 50, 108 S. Ct. 876, 99 L. Ed. 2d 41 (1988)).

As to the specific context, the Court considers the "content of the allegedly defamatory statements, which includes the extent of figurative and hyperbolic language and the reasonable expectations of the readers." *Id.* at 1102. Certain statements are [*20] obviously critical, and do use words like "embezzle," "fraud," and "abuse." For example, there are statements that: "they obtained money from participants on false, deceitful declarations"; "companies, individuals give money to AOL organisation for specific projects, but the money never reaches those projects...None of this money goes toward helping any poor or disadvantaged people"; and "if you...want to launder your black money...then AOL is for you." Plaintiff has its strongest case for defamation when these particular statements are read in isolation.

With context, however, these statements of hyperbole reflect poorly on Art of Living, but do not amount to factual accusations of criminal activity, especially on Blogs that readers obviously expect are critical of Art of Living. See *Nicosia*, 72 F. Supp. 2d at 1104 (in context of heated debate on the Internet, "statements accusing [plaintiff] of being a 'fraud,' a 'criminal' and acting illegally are rhetorical hyperbole"). Courts have extended *First Amendment* protection to such statements in recognition of "the reality that exaggeration and non-literal commentary have become an integral part of social discourse." By protecting speakers [*21] whose statements cannot reasonably be interpreted as allegations of fact, courts "provide[] assurance that public debate will not suffer for lack of 'imaginative expression' or the 'rhetorical hyperbole' which has traditionally added much to the discourse of our Nation." *Milkovich*, 497 U.S. at 20 (quoting *Falwell*, 485 U.S. at 53-55). In addition, the Blogs do link to the Art of Living website and other articles about Art of Living that are positive, evincing a forum for debate and discussion.² See *id.* at 1101 (state-

ments published on Internet as part of "heated debate" are less likely to be viewed as assertions of fact).

2 As the Court is dismissing Plaintiff's defamation claim with leave to amend, the scope of any potential remedy for Plaintiff is not yet ripe for decision. The Court notes its concern, however, that Plaintiff requests an extremely broad injunction "restraining Defendants from operating the Blogs and requiring that the Blogs be removed from the Internet." Compl. at p. 19 ("Prayer for Relief"). Even if certain statements on the Blogs are eventually found defamatory, Plaintiff has cited no authority for the proposition that the remedy is for "the Blogs to be removed from [*22] the Internet" altogether just because they are critical of Art of Living and Shankar.

Finally, the statements as to the Art of Living Foundation (as opposed to Ravi Shankar, who is not a plaintiff in this action) are too loose and hyperbolic to be susceptible of being proven true or false. *See Milkovich*, 497 U.S. at 21-22 ("loose, figurative, or hyperbolic language" negates impression that author is making statement of fact). For example, the statement "Money from courses does not go into 'service projects' it goes into RS's [Ravi Shankar's] bank account" could be verifiable with respect to Shankar, but does not even refer to Art of Living. The statement "I am fully convinced that AOL is front-end name for a group of fraudulent NGOs. My lawyer tells me that what they are doing amounts to large-scale organized fraud according to the laws of several countries" is clearly harsh, but, as noted above, does not clearly implicate Plaintiff. Rather, the statement voices an opinion ("fully convinced") in connection with the author's beliefs about the international organization's lack of financial transparency, and relays what the "lawyer" told the author about the international organization's [*23] practices. *See Underwager*, 69 F.3d at 367 (denying defamation claim where defendant's statement that plaintiff was "lying" in a deposition may have been an exaggeration, but did not imply a verifiable assertion of perjury).

In sum, under the totality of circumstances, the statements at issue are not assertions of fact, but are instead constitutionally protected opinions.

d. Actual Malice

Public figures must prove actual malice in order to recover on defamation claims. *See New York Times v. Sullivan*, 376 U.S. 254, 279-80, 84 S. Ct. 710, 11 L. Ed. 2d 686 (1964). Actual malice means that the defamatory statement was made with "knowledge that it was false or with reckless disregard of whether it was false or not." *Id.* Reckless disregard, in turn, means that the publisher "in fact entertained serious doubts as to the truth of his

publication." *See St. Amant v. Thompson*, 390 U.S. 727, 731, 88 S. Ct. 1323, 20 L. Ed. 2d 262 (1968). To prove actual malice, a plaintiff must "demonstrate with clear and convincing evidence that the defendant realized that his statement was false or that he subjectively entertained serious doubts as to the truth of his statement." *See Bose Corp. v. Consumers Union of U.S., Inc.*, 466 U.S. 485, 511 n.30, 104 S. Ct. 1949, 80 L. Ed. 2d 502 (1984).

In *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 94 S. Ct. 2997, 41 L. Ed. 2d 789 (1974), [*24] the Supreme Court defined two classes of public figures. The first is the "all purpose" public figure who has "achiev[ed] such pervasive fame or notoriety that he becomes a public figure for all purposes and in all contexts." The second category is that of the "limited purpose" public figure, an individual who "voluntarily injects himself or is drawn into a particular public controversy and thereby becomes a public figure for a limited range of issues." *Gertz*, 418 U.S. at 351. Unlike the "all purpose" public figure, the "limited purpose" public figure loses certain protection for his reputation only to the extent that the allegedly defamatory communication relates to his or her role in a public controversy.

Plaintiff is likely a limited public figure because it is part of a relatively well-known international organization and voluntarily solicits media attention. In addition, Plaintiff is part of a "public controversy" with respect to the allegations that Plaintiff is a "cult" and allegations regarding Art of Living's international activities. *See Reader's Digest Assn. v. Superior Court*, 37 Cal. 3d 244, 256, 208 Cal. Rptr. 137, 690 P.2d 610 (Cal. 1984). Given the Court's dismissal of the defamation claim with leave [*25] to amend on other grounds, however, the Court need not decide the "actual malice" issue at this time.³

3 The Court notes that Plaintiff has requested discovery with respect to Defendants' intent and knowledge when publishing the allegedly defamatory statements, including discovery of Defendants' identities. The Court agrees with Defendants that discovery on Defendants' intent and knowledge (e.g., "actual malice") is inappropriate when Plaintiff has not stated a valid defamation claim for the various reasons explained above.

e. Conclusion on Defamation Claim

Although "the purpose of the anti-SLAPP statute is 'to allow early dismissal of meritless *first amendment* cases aimed at chilling expression," the Ninth Circuit has clearly ruled that "granting a defendant's anti-SLAPP motion to strike a plaintiff's initial complaint without granting the plaintiff leave to amend would directly collide with *Fed. R. Civ. P. 15(a)*'s policy favoring liberal

amendment." See *Verizon Del., Inc. v. Covad Communs. Co.*, 377 F.3d 1081, 1091 (9th Cir. 2004). Here, because it is not clear that leave to amend would be futile, and this is Plaintiff's initial complaint, striking Plaintiff's initial Complaint would "directly [*26] collide" with *Rule 15's* liberal amendment policy. Accordingly, for all the reasons explained above, the Court GRANTS Defendants' motion to dismiss the defamation claim with leave to amend. In light of this dismissal, the Court does not reach the motion to strike the defamation claim. Of course, Defendants may re-raise their anti-SLAPP arguments in opposition to any amended complaint. See *id.* ("If the offending claims remain in the first amended complaint, the anti-SLAPP remedies remain available to defendants.").

Trade Libel

Trade libel is defined as "an intentional disparagement of the quality of property, which results in pecuniary damage. . . ." *Erllich v. Etner*, 224 Cal. App. 2d 69, 73, 36 Cal. Rptr. 256, 258 (1964). The cause of action for trade libel thus requires: (1) a publication, (2) which induces others not to deal with plaintiff, and (3) special damages.

To the extent that it is just a re-characterization of Plaintiff's defamation claim, the trade libel claim falls for the reasons that the statements at issue in the Complaint are not "of and concerning" Plaintiff and are not verifiable factual assertions. See *Blatty v. New York Times Co.*, 42 Cal. 3d 1033, 1043, 232 Cal. Rptr. 542, 728 P.2d 1177 (Cal. 1986) ("the [*27] various limitations rooted in the *First Amendment* are applicable to all injurious falsehood claims and not solely to those labeled 'defamation' is plain: although such limitations happen to have arisen in defamation actions, they do not concern matters peculiar to such actions but broadly protect free-expression and free-press values").

To the extent that Plaintiff's trade libel claim is distinct from the defamation claim, Plaintiff has failed to specifically plead special damages in the form of pecuniary loss. See *Fed. R. Civ. P. 9(g)* ("If an item of special damage is claimed, it must be specifically stated."). The allegations in the Complaint are simply that Plaintiff "has been substantially harmed" and that "due to the continuing presence of the Blogs, and their false and defamatory statements, Plaintiff continues to suffer irreparable injury." Compl. ¶¶ 73-74. These general statements of harm do not sufficiently identify special damages. See *Luxpro Corp. v. Apple Inc.*, 2011 U.S. Dist. LEXIS 35008, *42 (N.D. Cal. Mar. 24, 2011) ("Although a plaintiff does not need to plead a specific dollar amount, the plaintiff should allege an "established business, the amount of sales for a substantial [*28] period preceding the publication, the amount of sales subsequent to the publication,

[and] facts showing that such loss in sales were the natural and probable result of such publication.").

Accordingly, the Court GRANTS Defendants' motion to dismiss the trade libel claim. The Court, however, grants Plaintiff leave to amend its trade libel claim because it is not clear that amendment would be futile, and because this is Plaintiff's initial complaint. As with the defamation claim, striking Plaintiff's trade libel claim pursuant to the California Anti-SLAPP Statute at this point would "directly collide" with *Rule 15's* liberal amendment policy. See *Verizon*, 377 F.3d at 1091. Defendants may re-raise their anti-SLAPP arguments in opposition to any amended complaint.

C. Motion to Strike Trade Secrets Claim (CCP §425.16)

Defendants did not move to dismiss the trade secrets claim, but instead moved to strike the trade secrets claim under the California Anti-SLAPP Statute. Defendants argue that: (1) the alleged trade secrets are actually known within the yoga community; (2) it is not clear that the alleged secrets have "independent economic value;" and (3) Plaintiff has not taken reasonable efforts [*29] to protect the confidentiality of the secrets. Plaintiff responds that the California Anti-SLAPP Statute does not apply to its trade secrets claim because publishing the trade secret was not protected First Amended speech, and that, even if the statute applies, it has established a probability of prevailing on the claim.

1. Legal Standards

a. Section 425.16

The California legislature enacted *section 425.16* to "provide a fast and inexpensive unmasking and dismissal of SLAPP" suits. SLAPP suits are "lawsuits brought primarily to chill the valid exercise of the constitutional rights of freedom of speech and petition for the redress of grievances in connection with a public issue." *Wilcox v. Superior Court*, 27 Cal. App. 4th 809, 819, 33 Cal. Rptr. 2d 446 (1994) (quoting *Cal. Civ. Proc. Code § 425.16(a), (b)*). A defendant who brings a *section 425.16* motion has the initial burden of presenting a prima facie case that the suit arises "from any act of [defendant] in furtherance of [defendant's] right of petition or free speech under the United States or California Constitution in connection with a public issue." *Wilcox*, at 820 (quoting *Cal. Civ. Proc. Code § 425.16(b)*) (internal quotations omitted).

If defendant meets [*30] this burden, the burden shifts to the plaintiff to establish "a probability that plaintiff will prevail on the claim." *Wilcox*, at 823 (quoting *Cal. Civ. Proc. Code §425.16(b)*). To show a proba-

bility of prevailing, "the plaintiff must demonstrate the complaint is legally sufficient and supported by a sufficient prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited." *Wilcox*, at 824. The determination is made on the basis of the pleadings, as well as supporting and opposing affidavits stating the facts upon which the liability or defense is based. *Cal. Civ. Proc. Code § 425.16(b)(2)*. Pleadings by themselves are inadequate to demonstrate a prima facie case -- the plaintiff must submit admissible evidence to show a probability of prevailing at trial. *Evans v. Unkow*, 38 Cal. App. 4th 1490, 1497-98, 45 Cal. Rptr. 2d 624, 628-29 (1995).

b. Trade Secrets

Under California's Uniform Trade Secrets Act, a "trade secret" is defined as information that: (1) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and [*31] (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. *Cal. Civ. Code § 3426.1(d)*. "[I]nformation can be a trade secret even though it is readily ascertainable, so long as it has not yet been ascertained by others in the industry." *ABBA Rubber Co. v. Seaquist*, 235 Cal. App. 3d 1, 21, 286 Cal. Rptr. 518 (Cal. Ct. App. 1991). Moreover, "[c]ombinations of public information from a variety of different sources when combined in a novel way can be a trade secret." 2 *Micro Intern. Ltd. v. Monolithic Power Systems, Inc.*, 420 F. Supp. 2d 1070, 1089 (N.D. Cal. 2006). Whether information is publicly known is a factually intensive analysis. *DVD Copy Control Ass'n, Inc. v. Bunner*, 116 Cal. App. 4th 241, 252, 10 Cal. Rptr. 3d 185 (Cal. Ct. App. 2004). Finally,

2. Analysis

a. Defendants' Initial Burden

Under the burden-shifting framework of the California Anti-SLAPP Statute, Defendants must first show that the suit "arises from" any act in furtherance of Defendants' freedom of expression on a "public issue." See *Cal. Civ. Proc. Code § 425.16(b)*; see also *Tuck Beckstoffer Wines LLC v. Ultimate Distribs.*, 682 F. Supp. 2d 1003, 1009 (N.D. Cal. 2010) ("the court [*32] must determine whether the defendant has made a threshold showing that the challenged cause of action is one 'arising from' protected activity"). Here, Defendants' anonymous statements that the Art of Living Foundation is basically a cult and a sham is speech on a "public issue." See *Church of Scientology v. Wollersheim*, 42 Cal. App. 4th 628, 649, 49 Cal. Rptr. 2d 620 (Cal. App. 2d Dist. 1996) (allegations that Church of Scientology harmed and

abused its members was speech in connection with a "public issue"). Defendant Skywalker appears to have published the alleged trade secrets documents -- Art of Living teaching manuals -- as part of a larger effort to debunk the notion that the Art of Living Foundation and Ravi Shankar possess some "secret higher knowledge." Thus, Defendants have satisfied the initial anti-SLAPP burden by establishing a direct connection between Defendant Skywalker's disclosure and Defendants' other protected speech on a public issue. See *World Financial Group, Inc. v. HBW Ins. & Financial Services, Inc.*, 172 Cal. App. 4th 1561, 1568, 92 Cal. Rptr. 3d 227 (Cal. App. 2d Dist. 2009) (in determining whether the "arising from" requirement is met, the critical point is whether the plaintiff's cause of action [*33] itself was based on an act in furtherance of the defendant's right of petition or free speech."). The Court now turns to Plaintiff's burden of establishing a prima facie trade secrets claim.

b. Plaintiff's Responsive Burden

As Defendants have met their initial burden, the burden shifts to the Plaintiff to establish a sufficient prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited. Plaintiff has made such a showing. See *Religious Tech. Ctr. v. Netcom On-Line Commun. Servs.*, 923 F. Supp. 1231, 1250-51 (N.D. Cal. 1995).

Defendant Skywalker (and only Defendant Skywalker) has admitted to posting the alleged trade secrets documents in June and July 2010. See Defs.' Mot. to Strike at 6 ("Skywalker, in June and July 2010, posted the alleged trade secret documents"). In addition, the "spiritual" nature of the works does not remove them from trade secrets protection. As the Honorable Ronald M. Whyte noted in a similar case:

"thus, there is at least some precedent for granting trade secret status to works that are techniques for improving oneself (though not specifically spiritually). Conversely, there is no authority for excluding religious [*34] materials from trade secret protection because of their nature. Indeed, there is no authority for excluding any type of information because of its nature. While the trade secret laws did not necessarily develop to allow a religion to protect a monopoly in its religious practices, the laws have nonetheless expanded such that the Church's techniques, which clearly are 'used in the operation of the enterprise,' Restatement § 39, at 425, are deserving of protection if secret and valuable."

Religious Technology Center, 923 F. Supp. at 1252.

Moreover, Plaintiff has submitted credible evidence that it derives independent economic value from the secret teaching manuals and has established reasonable efforts to keep the manuals confidential. According to declarations submitted with the opposition to the motion to strike, Plaintiff generates revenue from its courses and lessons based on the confidential teaching manuals. *See* Declaration of Ashwani Dhall, Chairperson of the Board of Directors for AOL-F-US, ¶¶64-69 ("Dhall Decl.") [dkt. #40]. Plaintiff distinguishes itself from other organizations that teach breathing, yoga, and meditation by offering classes based on its confidential teaching manuals. [*35] *See ABBA Rubber Co. v. Seaquist, 235 Cal. App. 3d 1, 18, 286 Cal. Rptr. 518 (Cal. App. 4th Dist. 1991)* (information that obtains value from its secrecy to competitors is subject to trade secret protection).

With respect to maintaining secrecy, Plaintiff has submitted evidence that it keeps its manuals and lessons on password-protected computers, limits access to the electronic files, requires teachers to agree not to disclose the manuals and lessons, and requires teachers to agree to not use the manuals and lessons for any other purpose than teaching Plaintiff's courses. *See* Dhall Decl. at ¶¶ 29-36. Although the students do not sign non-disclosure agreements, the students also do not receive the actual manuals and lessons. On balance, these efforts at maintaining secrecy are reasonable under these circumstances. *See Religious Technology Center, 923 F. Supp. at 1254* ("Efforts at maintaining secrecy need not be extreme, just reasonable under the circumstances.").

Defendants object that the manuals and lessons are not confidential because they are based on techniques that are already known within the yoga community. Information generally known to the public is not protectable as trade secret information. However, [*36] "[t]he secrecy requirement is generally treated as a relative concept and requires a fact-intensive analysis." *See DVD Copy Control Assn., Inc. v. Bunner, 116 Cal. App. 4th 241, 251, 10 Cal. Rptr. 3d 185 (Cal. App. 6th Dist. 2004)* (citing 1 *Milgrim on Trade Secrets* (2003) § 1.07[2], pp. 1-343, 1-352.). Defendants have not established that the manuals and lessons are generally known to the public. "Publication on the Internet does not necessarily destroy the secret if the publication is sufficiently obscure or transient or otherwise limited so that it does not become generally known to the relevant people, i.e., potential competitors or other persons to whom the information would have some economic value." *See id.* Moreover, Defendants cannot rely on their own improper postings to support the argument that the works are no longer se-

crets. *See Religious Technology Center, 923 F. Supp. at 1256.*

Defendants are correct, however, that Plaintiff has not identified the "secret aspects" of their teaching manuals and lessons with sufficient particularity. *See id. at 1252* ("Although trade secret status may apply to works that are techniques for spiritually improving oneself, the secret aspect of those techniques must [*37] be defined with particularity"). From the Court's review of the alleged trade secrets (filed under seal), it is clear that the works, in their entirety, are not entitled to trade secret protection. For example, as counsel for Plaintiff conceded at the May 26, 2011 hearing, some of the information is simply biographical information about Ravi Shankar and the Art of Living Foundation.

Defendants argue that the trade secrets claim should be completely stricken for insufficient particularity. However, counsel for Defendants cited no case law in their briefing or at the May 26, 2011 hearing for the proposition that a trade secrets claim may be stricken for insufficient particularity, and the Court has found none. Instead, "[i]n any action alleging the misappropriation of a trade secret ..., before commencing discovery relating to the trade secret, the party alleging the misappropriation shall identify the trade secret with reasonable particularity" (§ 2019.210). *See Perlan Therapeutics, Inc. v. Superior Court, 178 Cal. App. 4th 1333, 1343, 101 Cal. Rptr. 3d 211 (Cal. App. 4th Dist. 2009)*. This "rule assists the court in framing the appropriate scope of discovery and in determining whether plaintiff's discovery [*38] requests fall within that scope. *Id.* Thus, discovery on the trade secrets claim may not proceed until Plaintiff identifies the scope of its trade secrets with reasonable particularity.

As a final point, the Complaint alleges that "Doe Defendants" misappropriated its trade secrets. However, on the record before the Court, only Doe Skywalker acknowledged publishing the alleged trade secrets. Thus, even if Plaintiff does identify its trade secrets with sufficient particularity (which it has not yet done), discovery on the trade secrets claim would only proceed against Doe Skywalker. *See Anonymous Online Speakers v. United States Dist. Court (In re Anonymous Online Speakers), 2011 U.S. App. LEXIS 487, *16 (9th Cir. Jan. 7, 2011)* (in the context of anonymous speech under the *First Amendment*, requiring a party seeking discovery to meet a "heightened relevance standard requiring plaintiffs to demonstrate an interest in obtaining the disclosures . . . which is sufficient to justify the deterrent effect . . . on the free exercise . . . of [the] constitutionally protected right of association.>").

In sum, although the Court is denying Defendants' motion to strike the trade secrets claim, Plaintiff [*39]

may not obtain discovery with respect to that claim until it identifies, with reasonable particularity, the genuinely secret aspects of its teaching lessons and manuals.

III. CONCLUSION

For all the reasons explained above, Defendants' motion to dismiss for lack of personal jurisdiction is DENIED. Defendants' motion to dismiss the defamation and trade libel claims is GRANTED with leave to amend. Defendants' motion to strike the defamation, trade libel, and trade secrets claims is DENIED WITHOUT PREJUDICE. However, discovery on the trade

secrets claim may not proceed until Plaintiff identifies the confidential trade secrets with sufficient particularity. Any amended complaint must be filed within thirty (30) days of this Order.

IT IS SO ORDERED.

Dated: June 15, 2011

/s/ Lucy H. Koh

LUCY H. KOH

United States District Judge



**OBERWEIS DAIRY, INC., Plaintiff, v. DEMOCRATIC CONGRESSIONAL
CAMPAIGN COMMITTEE, INC., Defendant.**

Case No. 08 C 4345

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION**

2009 U.S. Dist. LEXIS 18514

March 11, 2009, Decided

March 11, 2009, Filed

PRIOR HISTORY: *Oberweis Dairy, Inc. v. Democratic Cong. Campaign Comm., Inc., 2008 U.S. Dist. LEXIS 84371 (N.D. Ill., Oct. 21, 2008)*

COUNSEL: [*1] For Oberweis Dairy, Inc., Plaintiff: Jody Knight, Thomas George DiCianni, Ancel, Glink, Diamond, Bush, DiCianni & Krafthefer, P.C., Chicago, IL.

For Democratic Congressional Campaign Committee, Inc., Defendant: C. Vincent Maloney, LEAD ATTORNEY, Perkins Coie LLP, Chicago, IL; Amanda Elizabeth Adrian, Perkins Coie LLC, Chicago, IL.

JUDGES: Hon. Harry D. Leinenweber, United States District Judge.

OPINION BY: Harry D. Leinenweber

OPINION

MEMORANDUM OPINION AND ORDER

Before the Court is the Defendant's Motion to Dismiss Plaintiff's Complaint pursuant to *Federal Rule of Civil Procedure 12(b)(6)*. For the following reasons, Defendant's Motion is Granted.

I. BACKGROUND

Oberweis Dairy, Inc. (hereinafter, the "Plaintiff"), an Illinois corporation, filed suit against the Democratic Congressional Campaign Committee, Inc. (hereinafter, the "Defendant"), in the Circuit Court of Kane County, Illinois, for false light invasion of privacy over a statement Defendant allegedly transmitted, through political advertisements, that "illegal immigrants were found working at plaintiff's dairy stores." Plaintiff maintains that this statement was intended to, and did, falsely communicate that Plaintiff hired and retained illegal immigrants as [*2] employees. Before the case was removed to this Court on July 31, 2008, Defendant moved the Circuit Court to dismiss the Complaint on three grounds: (1) a corporation has no standing to sue for false light invasion of privacy, (2) the Complaint fails to identify any false statement made by Defendant, and (3) Plaintiff failed to plead requisite special damages. Because Defendant's first challenge to the Complaint is dispositive, the Court need not address Defendant's remaining challenges.

II. ANALYSIS

On a *Rule 12(b)(6)* motion to dismiss, the Court accepts all well-pleaded allegations in the Complaint as true, and views the allegations in the light most favorable to the plaintiff, drawing all reasonable inferences in the

plaintiff's favor. *Bontkowski v. First Nat. Bank of Cicero*, 998 F.2d 459, 461 (7th Cir., 1993). "A complaint must always . . . allege 'enough facts to state a claim to relief that is plausible on its face.'" *Limestone Development Corp. v. Village of Lemont, Ill.*, 520 F.3d 797, 803 (7th Cir., 2008) (quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 127 S.Ct. 1955, 1974, 167 L. Ed. 2d 929 (2007)). To avoid dismissal, the "allegations must plausibly suggest that the plaintiff has a right to relief, raising [*3] that possibility above a 'speculative level.'" *E.E.O.C. v. Concentra Health Services, Inc.*, 496 F.3d 773, 776 (7th Cir., 2007) (citing *Bell Atlantic*, 127 S.Ct. at 1965).

The Defendant moves to dismiss Plaintiff's false light claim on the basis that corporations lack standing to sue for false light and the Court agrees. The parties acknowledge in their briefs that Illinois law controls Plaintiff's claim and, although Defendant has not pointed to any Illinois case that expressly holds that corporations lack standing to sue for false light, neither has Plaintiff cited *any* cases holding that corporations do have standing to sue for false light.

The single case Plaintiff cites in support of its position, *Pullman Standard Car Mfg. Co. v. Local Union No. 2928 of United Steelworkers of America*, 152 F.2d 493 (7th Cir., 1945), is a libel case recognizing that a corporation's business reputation is protected by law. But the tort of false light invasion of privacy does not protect a party's reputation; it protects an individual's personal privacy interest to be free from false publicity. See *Restatement (Second) of Torts § 652E cmt. b* (1977). Corporations do not have such a privacy interest. See [*4] *American States Ins. Co. v. Capital Associates of Jackson County, Inc.*, 392 F.3d 939 (7th Cir., 2004); *Restatement (Second) of Torts § 652I cmt. c* (1977).

The Illinois Supreme Court relies heavily on the Restatement for the definition and elements of a false light claim. See *Eberhardt v. Morgan Stanley Dean Witter Trust FSB*, No. 00-3303, 2001 U.S. Dist. LEXIS 1090, 2001 WL 111024 (N.D.Ill., Feb. 2, 2001); *Lovgren v. Citizens First Nat. Bank of Princeton*, 126 Ill. 2d 411, 534 N.E.2d 987, 990, 128 Ill. Dec. 542 (Ill., 1989) (citing to *Restatement (Second) of Torts § 652E cmt. c* (1977)). The *Restatement* has long recognized that corporations do

not have standing to sue for false light. *Restatement (Second) of Torts § 652I and cmt. c* (1977) ("A corporation . . . has no personal right of privacy. It has therefore no cause of action for any of the four forms of invasion covered by §§ 652B to 652E."). Several jurisdictions beyond Illinois also rely on the *Restatement's* privacy tort formulations and hold that corporations lack standing to sue for such torts. See *Felsher v. University of Evansville*, 755 N.E.2d 589 (Ind., 2001); *Southern Air Transport, Inc. v. American Broadcasting Companies, Inc.*, 670 F.Supp. 38 (D.D.C., 1987); *Fibreboard Corp. v. Hartford Accident and Indemnity Co.*, 16 Cal. App. 4th 492, 20 Cal.Rptr.2d 376 (Cal.App. 1 Dist., 1993). [*5] Even in jurisdictions not relying on the *Restatement*, courts have found that corporations lack standing to sue for privacy torts, including false light. See, e.g., *Seidl v. Greentree Mortg. Co.*, 30 F.Supp.2d 1292 (D.Colo., 1998); *CNA Financial Corp. v. Local 743 of Intern. Broth. of Teamsters, Chauffeurs, Warehousemen and Helpers of America*, 515 F.Supp. 942 (N.D.Ill., 1981) (citing California, New York, Pennsylvania and Kentucky law).

The Court finds that, because Illinois has adopted the *Restatement's* definition of a false light claim which excludes corporations from standing to assert such a claim, considerable authority from other jurisdictions has declined to recognize a corporation's false light claim, and Plaintiff has cited no authority supporting such a claim, the Supreme Court of Illinois would hold that Plaintiff has failed to state a claim under Illinois law.

CONCLUSION

For the reasons stated herein, the Defendant's Motion to Dismiss is Granted.

IT IS SO ORDERED.

/s/ Harry D. Leinenweber

Harry D. Leinenweber, Judge

United States District Court

DATE: 3/11/2009

PAUL S. GROSSWALD

Attorney at Law

140 Prospect Avenue, Suite 8S

Hackensack, NJ 07601

(917) 753-7007

Attorney for Defendants,

Michele Colón and Tyler Newton

WORLD MISSION SOCIETY
CHURCH OF GOD, et al.

Plaintiff,

v.

MICHELE COLÓN, et al.

Defendant.

) SUPERIOR COURT OF NEW JERSEY
) LAW DIVISION: BERGEN COUNTY
)
) DOCKET NO. BER-L-5274-12

Civil Action

**SECOND AFFIDAVIT OF
TYLER J. NEWTON
IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS**

STATE OF VIRGINIA)
)
COUNTY OF FAIRFAX)

SS.:

Tyler J. Newton, on his oath, deposes and says:

1. I am one of the Defendants in the above-captioned matter. As such I am fully familiar with the facts contained herein.
2. I make this Affidavit in support of Defendants' Motion to Dismiss.

The Examining Website

3. My interest in the World Mission Society Church of God ("WMSCOG") arose out of my general interest in religion.
4. I first became aware of the WMSCOG in 2010 when I came across some of the church's recruiters in a Virginia shopping center using high-pressure recruiting tactics on a young man.

5. Being interested in religion, I inquired as to who they were, and they told me they were with the "Church of God," which I later learned was the WMSCOG.
6. I subsequently began doing research into the WMSCOG.
7. I compiled my research into a series of articles which I posted to the Internet.
8. I had never intended those articles to evolve into a permanent hobby.
9. Nevertheless, my articles attracted a large volume of traffic and positive feedback. People began thanking me, and encouraging me to continue providing information.
10. Inspired by such feedback, I compiled my research into a single website, located at examiningthewmscog.com (the "Examining Website").
11. The Examining Website first went online in February 2011.
12. The Examining Website contains a collection of articles, opinion pieces, public documents, and former member testimony.
13. The Examining Website does not sell any goods or services.
14. The Examining Website does not ask its users to enter into contracts.
15. The Examining Website does not raise money.
16. The Examining Website does not engage its users in financial transactions of any kind.
17. Annexed hereto as Exhibit "C" is a true and accurate copy of a screenshot showing the Examining Website's home page.

The WMSCOG Strikes Back

18. I believe that every statement on the Examining Website is either factually true, or a constitutionally protected opinion.
19. If it is proven to me that a factually false statement exists on the Examining Website, I will agree to remove it.

20. In the fall of 2011, the WMSCOG sent two cease and desist letters to my Internet Service Provider.
21. Annexed hereto as Exhibit "D" is a true and accurate copy of the first of those letters, dated September 28, 2011.
22. Annexed hereto as Exhibit "E" is a true and accurate copy of the second of those letters, dated October 7, 2011.
23. Neither of those letters contained any information to indicate that there was a factually false statement on the Examining Website.
24. Therefore, I refused to remove any material from the Examining Website after receiving those letters.
25. The New Jersey branch of the WMSCOG ("Plaintiff World Mission") subsequently filed a defamation lawsuit against me in Virginia (World Mission Soc. Church of God v. Colón, CL-2011-17163 (Jud. Cir. Va.)) (the "Virginia Case").
26. The challenged statements in the Virginia Case were substantially similar to the challenged statements in the instant case.
27. I filed an Answer in the Virginia Case on or around April 3, 2012.
28. Annexed hereto as Exhibit "F" is a true and accurate copy of that Answer.
29. On March 22, 2012, the court in the Virginia Case issued a Scheduling Order, which included a discovery end date and a trial date.
30. Annexed hereto as Exhibit "G" is a true and accurate copy of that Scheduling Order.
31. The Virginia Case ended after nine months, when Plaintiff World Mission voluntarily dismissed it, after I filed a motion to sanction Plaintiff World Mission for missing a discovery deadline.

32. I spent more than \$70,000 in legal fees to defend myself in the Virginia Case.

Facebook Group

33. In February 2011, I joined a private Facebook group called "Former Members World Mission Society Church of God Cult" (the "Facebook Group").

34. Postings to the Facebook Group were only visible to other members of the group, and were not visible to the general public.

35. The Facebook Group consisted of about 40 members.

36. No one was permitted to become a member of the group unless they were invited.

37. Invitations were extended to people who had previously expressed concern about the activities of the WMSCOG.

38. None of the communications in the Facebook Group were commercial in nature.

39. When posting to the Facebook Group, I used the name "James Newton."

40. On September 10, 2011, I posted a statement to the Facebook Group, which is referenced in ¶ 65 of the First Amended Complaint (the "Facebook Post").

41. I made the statement contained in the Facebook Post in response to a post made by another member of the group, who used the name "Mary Brown."

42. Annexed hereto as Exhibit "H" is a true and accurate copy of the Facebook Post, including the statement posted by Mary Brown to which I responded, and the statement posted by me in response.

43. At some point, on information and belief, an agent of Plaintiff World Mission infiltrated the Facebook Group by pretending to be a critic of the WMSCOG.

44. Once the agent had access to the Facebook Group, the agent would have been able to view all of the comments that were made by the other group members.

45. I believe that explains how Plaintiff World Mission came to learn about the Facebook Post described in ¶ 65 of the First Amended Complaint.

Presidential Volunteer Service Award Article

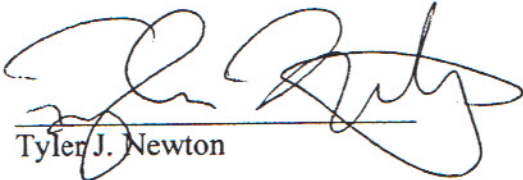
46. On April 11, 2013, I spoke on the telephone to Whitner O'Dowd, a representative of the Presidential Volunteer Service Award office in Atlanta, Georgia.
47. Ms. O'Dowd's phone number is 1-404-574-5391.
48. I discussed with her the challenged statements alleged in ¶¶ 49-52 of the First Amended Complaint.
49. I recorded the call with her permission.
50. Afterwards, I transcribed the call.
51. Annexed hereto as Exhibit "I" is a true and accurate copy of the transcription I made of that call.
52. Annexed hereto as Exhibit "J" is an audio CD containing the recorded call. It is formatted to be played back on any standard CD player or computer CD-ROM drive.

Lack of Personal Jurisdiction

53. I am a resident of Virginia, and I object to being haled into court in New Jersey because New Jersey lacks personal jurisdiction over me.
54. I have lived in Virginia my entire life.
55. I do not work in New Jersey.
56. I do not own any assets or property in New Jersey.
57. All of the materials that I have ever posted to the Internet pertaining to the WMSCOG were posted exclusively in Virginia.
58. I created the Examining Website exclusively in Virginia.

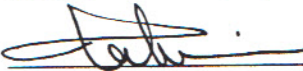
- 59. I maintain the Examining Website exclusively in Virginia.
- 60. I post material to the Examining Website exclusively in Virginia.
- 61. I edit the Examining Website exclusively in Virginia.
- 62. I posted comments to the Facebook Group exclusively in Virginia.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


 Tyler J. Newton

Sworn to before me this
 12th day of April, 2013

TAHIRA RIAZ
 NOTARY PUBLIC
 COMMONWEALTH OF VIRGINIA
 MY COMMISSION EXPIRES DEC. 31, 2015
 COMMISSION # 7510646


 Notary Public, State of Virginia

04-12-2013

EXHIBIT

D

Dozier Internet Law, P.C.

September 28, 2011

VIA EMAIL: abuse@icdsoft.com; hosting@icdsoft.com

ICDSoft Ltd.
Tzvetna Gradina Str. 39-41
1421, Sofia
Bulgaria

Re: World Mission Society, Church of God – Defamation – Our File No. 0953-001

Dear Sir or Madam:

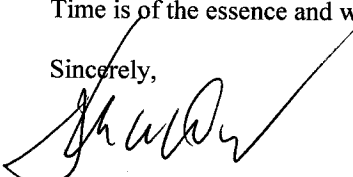
Please be advised that we represent the World Mission Society, Church of God with respect to a website that you host which violates your Terms of Use. There is a website located at www.ExaminingtheWMSCOG.com that has been launched to attack our clients and contains extensive defamatory claims. These types of attacks are having a very significant impact on our client's organization and activities. Your Terms of Use include the following section that states:

“Defamation: The customer may not host material that is . . . offensive to any person or group. This includes but is not limited to prejudice, racism, intolerance, hatred, and harassment; expressions that are by nature libelous, defamatory, and offensive to or disrespectful of ethnic, racial, religious, or other groups; . . . likely to cause damage to reputation of third parties.”

This website is malicious, defamatory in nature, and suggests the existence of unethical activities without any basis in fact. Furthermore, it disparages and mocks our client's religious beliefs, in clear violation of your Terms of Use. Consequently, given the broad nature of these defamatory attacks, we respectfully request you promptly terminate your hosting services for this site as a violation of your Terms of Use and notify us when this has occurred.

Time is of the essence and we appreciate your prompt cooperation and attention.

Sincerely,


John W. Dozier, Jr., Esq.

JWDjr/hlh

EXHIBIT

E

Dozier Internet Law, P.C.

October 7, 2011

VIA EMAIL: abuse@icdsoft.com

Mr. Vesselin Hadjinikolov
ICDSoft Ltd.
Tzvetna Gradina Str. 39-41
1421, Sofia
Bulgaria

Re: World Mission Society, Church of God – Defamation – Our File No. 0953-001

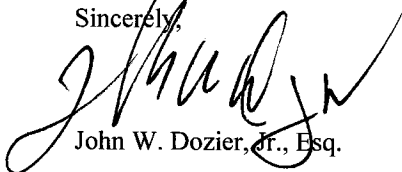
Dear Mr. Hadjinikolov:

In response to your email of September 29, 2011, I refer you to the following URLs that contain defamatory statements about my client:

- <http://www.examinethewmscog.com/religious-groups-in-korea/>
- <http://www.examinethewmscog.com/archives/is-the-world-mission-society-church-of-god-a-cult/>
- <http://www.examinethewmscog.com/archives/the-world-mission-society-church-of-god-religious-freedom-or-religious-fraud/>
- <http://www.examinethewmscog.com/archives/why-is-it-so-difficult-for-wmscog-members-to-leave-part-1/>

Although I have provided these specific URLs as examples, this entire website is malicious and defamatory, and it mocks and disparages my client's religious beliefs in clear violation of your Terms of Use, as detailed in my letter dated September 28, 2011. Consequently, I again request that you promptly terminate your hosting services for this site as a violation of your Terms of Use and notify us when this has occurred.

Sincerely,



John W. Dozier, Jr., Esq.

JWDjr/hlh

PAUL S. GROSSWALD, ESQ.
 140 Prospect Avenue, Suite 8S
 Hackensack, NJ 07601
 (917) 753-7007
 Attorney for Defendant,
Michele Colón

)	SUPERIOR COURT OF NEW JERSEY
WORLD MISSION SOCIETY)	LAW DIVISION: BERGEN COUNTY
CHURCH OF GOD)	
Plaintiff,)	DOCKET NO. BER-L-5274-12
v.)	<u>Civil Action</u>
)	
MICHELE COLÓN,)	SECOND CERTIFICATION OF
)	PAUL S. GROSSWALD
Defendant.)	IN SUPPORT OF DEFENDANT
)	MICHELE COLÓN'S
)	MOTION TO DISMISS

I, Paul Grosswald, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am the attorney for Defendant Michele Colón in the above-captioned matter. As such, I am fully familiar with the facts contained herein. I submit this Second Certification in support of Ms. Colón's Motion to Dismiss.
2. I was also one of the attorneys for Tyler Newton while Mr. Newton was being sued by the Plaintiff in a similar case in Virginia earlier this year. As such, I am fully familiar with the documents related to that case that are contained herein. That case was brought in the Circuit Court of the Commonwealth of Virginia, County of Fairfax, Case No. 2011-17163 (hereinafter the "Virginia Case").
3. Annexed hereto as Exhibit "8" is a true and accurate copy of select pages from the discovery demands (interrogatories and requests for document production) propounded by the Plaintiff against Mr. Newton in the Virginia Case, dated April 16, 2012.

4. Annexed hereto as Exhibit "9" is a true and accurate copy of a letter sent from the Plaintiff's Virginia attorney to Mr. Newton's Virginia attorney, dated May 4, 2012
5. Annexed hereto as Exhibit "10" is a true and accurate copy of a letter opinion and Order handed down by the court in the Virginia case on July 20, 2012.
6. Annexed hereto as Exhibit "11" is a true and accurate copy of an Order handed down by the court in the Virginia case resolving motions that were heard on September 7, 2012.
7. Annexed hereto as Exhibit "12" are true and accurate copies of each unpublished opinion cited to in the accompanying brief, pursuant to R. 1:36-3, minus those opinions that were previously submitted with my first Certification in support of the pending motion:
 - Ciemniecki v. Parker McCay P.A., 2010 U.S. Dist. LEXIS 55661 (D.N.J. June 7, 2010)
 - Graco, Inc. v. PMC Global, Inc., 2009 U.S. Dist. LEXIS 26845 (D.N.J. Mar. 31, 2009)
 - Munoz v. Perla, 2011 N.J. Super. Unpub. LEXIS 3096 (App. Div. Dec. 20, 2011)
 - Oberweis Dairy, Inc. v. Democratic Cong. Campaign Comm., Inc., 2009 U.S. Dist. LEXIS 18514 (N.D. Ill. Mar. 11, 2009)
 - Vasquez v. Addiego, 2010 N.J. Super. Unpub. LEXIS 890 (App. Div. Apr. 23, 2010)
8. Annexed hereto as Exhibit "13" is a true and accurate copy of screenshots showing the results of Google searches with the number of hits circled in red, and a list of Internet sites providing public comment on the Plaintiff.
9. Annexed hereto as Exhibit "14" is a true and accurate copy of the State of Maryland's "Report of the Task Force to Study the Effects of Cult Activities on Public Senior Higher Education Institutions," as published on the website of the International Cultic Studies Association, at:

http://www.icsahome.com/infoserv_articles/mdtaskforce_full.htm

(last visited December 2, 2012), with relevant portions highlighted in yellow.

10. Annexed hereto as Exhibit "15" is a true and accurate copy of the NYU Campus Safety Page, at:

<http://www.law.nyu.edu/housing/oncampushousing/NYU4UWellnessInitiatives/Safety/index.htm>

(last visited December 2, 2012), with relevant portions highlighted in yellow.

11. Annexed hereto as Exhibit "16" is a true and accurate copy of the following law review article: Marc A. Franklin & Daniel J. Bussel, Defamation and the First Amendment: New Perspectives: The Plaintiff's Burden in Defamation: Awareness and Falsity, 25 Wm. & Mary L. Rev. 825 (1984).

12. Annexed hereto as Exhibit "17" is a true and accurate copy of the challenged statement referenced in ¶ 33 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

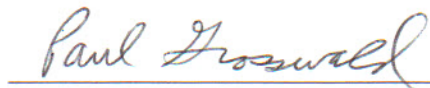
13. Annexed hereto as Exhibit "18" is a true and accurate copy of the challenged statement referenced in ¶ 34 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

14. Annexed hereto as Exhibit "19" is a true and accurate copy of the challenged statement referenced in ¶ 36 of the Plaintiff's Proposed First Amended Complaint, along with a true and accurate copy of the relevant pages from the Form 1023 that is referenced within said challenged statement.

15. Annexed hereto as Exhibit "20" is a true and accurate copy of a page from the World Mission Society Church of God ("WMSCOG") website describing the "Home Office."
16. Annexed hereto as Exhibit "21" is a true and accurate copy of pages from the WMSCOG website containing photographs depicting the church's worship services and study groups in which the men and the women are segregated.
17. Annexed hereto as Exhibit "22" is a true and accurate copy of a page from the WMSCOG website containing the stories of the "Sleepy-Head" and the "Four-Hour Driver" referenced in Ms. Colón's accompanying brief, with the relevant sections highlighted in yellow.
18. Annexed hereto as Exhibit "23" is a true and accurate copy of a cover article published in June 1994 by Modern Maturity magazine, entitled "Cults: Forget Kids. Now They're After You."
19. Annexed hereto as Exhibit "24" is a true and accurate copy of pages from the WMSCOG website containing references to the church's practice of fasting, with the relevant sections highlighted in yellow.
20. Annexed hereto as Exhibit "25" is a true and accurate copy of the Complaint filed in the Virginia Case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 3, 2012



Paul S. Grosswald

EXHIBIT

9

Dozier Internet Law, P.C.

May 4, 2012

VIA EMAIL: lberlik@berliklaw.com

Lee E. Berlik, Esq.
BerlikLaw, LLC
1818 Library Street
Suite 500
Reston, VA 20190

Re: World Mission Society, Church of God vs. Michele Colon and Tyler J. Newton
Case No.: 2011-17163

Dear Lee:

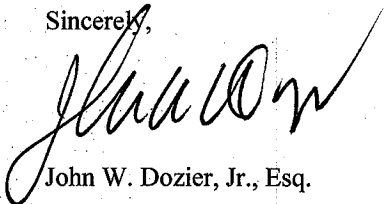
We have considered approaching a settlement in this matter on a "peace-meal" basis in which we took into account all of the comments made by your clients. We find this approach untenable and unacceptable.

Our client has authorized us to make an offer to dismiss all claims against both parties with prejudice in return for the following:

1. Removal of all references to our client and all those affiliated in any manner with our client;
2. An agreement of non-disparagement moving forward; and
3. Standard Confidentiality and other provisions the parties agree are acceptable in the Settlement Agreement.

Obviously time is of the essence and we would like a response immediately.

Sincerely,



John W. Dozier, Jr., Esq.

JWDjr/lwc

PAUL S. GROSSWALD

Attorney at Law

140 Prospect Avenue, Suite 8S

Hackensack, NJ 07601

(917) 753-7007

Attorney for Defendants,

Michele Colón and Tyler Newton

WORLD MISSION SOCIETY)	SUPERIOR COURT OF NEW JERSEY
CHURCH OF GOD, et al.)	LAW DIVISION: BERGEN COUNTY
)	
Plaintiffs,)	DOCKET NO. BER-L-5274-12
)	
v.)	<u>Civil Action</u>
)	
MICHELE COLÓN, et al.)	FOURTH CERTIFICATION OF
)	PAUL S. GROSSWALD
Defendants.)	IN SUPPORT OF DEFENDANTS'
)	MOTION TO DISMISS
)	

I, Paul Grosswald, of full age, hereby certify as follows:

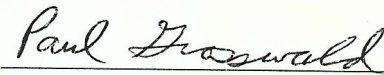
1. I am an attorney at law of the State of New Jersey and am the attorney for Defendants Michele Colón and Tyler Newton in the above-captioned matter. As such, I am fully familiar with the facts contained herein. I submit this Fourth Certification in support of the Defendants' Motion to Dismiss.
2. Annexed hereto as Exhibit "28" is a true and accurate copy of the Plaintiffs' Second Amended Complaint, filed on or around April 24, 2013.
3. Annexed hereto as Exhibit "29" is a true and accurate copy of a letter sent to the Court by Plaintiff's counsel dated April 24, 2013.
4. Annexed hereto as Exhibit "30" is a true and accurate copy of the Consent Order filed on February 25, 2013.

5. Annexed hereto as Exhibit "31" is a true and accurate copy of the unpublished opinion cited to in the accompanying brief, pursuant to R. 1:36-3:
 - Fourney v. Santos, 2005 N.J. Super. Unpub. LEXIS 424, *6-7 (App. Div. Oct. 6, 2005).
6. Annexed hereto as Exhibit "32" is a collection of printouts or screenshots produced by the Plaintiffs containing the challenged statements at issue in this case. Each page is a true and accurate copy of the printout or screenshot produced by the Plaintiffs as part of their recent document production, except that (1) the Defendants have inserted headings at the top of each page to assist the Court in determining which paragraph from the Second Amended Complaint each page corresponds to; and (2) Ms. Colón has inserted her own Bates numbers onto each page for easier reference by the Court.
7. Annexed hereto as Exhibit "33" is a true and accurate copy of the cover and relevant pages from the book Take Back Your Life: Recovering From Cults and Abusive Relationships, by Janja Lalich & Madeline Tobias (Bay Tree Publ'g, Berkeley, CA 2006), with relevant portions highlighted.
8. Annexed hereto as Exhibit "34" is a true and accurate copy of a collection of statements which can currently be found online containing criticisms of the WMSCOG that were made prior to October 2009, with relevant portions highlighted.
9. Annexed hereto as Exhibit "35" is a true and accurate copy of a collection of statements which can currently be found online containing criticisms of the WMSCOG that were made at or around October 2009 through May 2011, with relevant portions highlighted.

10. Annexed hereto as Exhibit "36" is a true and accurate copy of a collection of statements which can currently be found online containing criticisms of the WMSCOG that were made at or around June 2011 through September 2011, with relevant portions highlighted.
11. Annexed hereto as Exhibit "37" is a true and accurate copy of this Court's Order for Plaintiff World Mission to produce documents, which was issued on February 13, 2013.
12. Annexed hereto as Exhibit "38" is a CD containing two videos. One video is entitled "The World Mission Society Church of God - Destroys Families." The other video is entitled "World Mission Society Church of God - Public Financial Info!" The videos are each true and accurate copies of the videos produced by the Plaintiffs as part of their recent document production.
13. Annexed hereto as Exhibit "39" is a true and accurate copy of the relevant pages of Plaintiff World Mission's Response to Defendant's First Request for Production, dated April 15, 2013, containing a Rule 4:18-1 certification by Victor Lozada.
14. Annexed hereto as Exhibit "40" is a true and accurate copy of an email sent to me by Marco A. Santori on April 17, 2013.
15. Annexed hereto as Exhibit "41" is a true and accurate copy of the relevant pages of the transcript of the January 11, 2013 hearing in this matter, pertaining to the Presidential Volunteer Service Award issue, with relevant portions highlighted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 30, 2013


Paul S. Grosswald

EXHIBIT

32

Second Amended Complaint ¶ 30(e) / Page 1

Christian, Assistance from Nonprofits - World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ - Aidpage



A problem shared is a problem halved.

Sign up

Have an account? Log in

Aidpage is a social network for mutual support.

Ask for help
Offer help

Sign up now

Talking about: **World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ**
8 posts
3,601 visits



Squirrel started this conversation
Feb 14, 2011

share

Organization Name: **World Mission Society Church Of God A Nj Nonprofit Corporation**

Function, Activity: **Christian**

Assets: **\$0**

Income: **\$0**

Contact Info:

**305 Godwin Ave
Ridgewood, NJ 07450**

Tip:

Use Google to find website, phone, and email for this organization. Add the info you found as a comment under this post. This will help other visitors of this page. Thank you!

Conversations (285,475)

I'm sadder, by the injustice, I'm going thru, all because of discrimination in PHA, plot

Business Development, small business help: Save Me read more at this link:

I need help to find my 5 year old granddaughter who was adopted in winnimucca nv in the

8442585



Talking about

Christian

Assistance from Nonprofits

Nonprofit Resources - Christian

Nonprofit Resources in Ridgewood, NJ



Members who visited (6)

Greentea - Apr 19, 2012

ET98 - Apr 19, 2012

lovethe teaching of god - Apr 18, 2012

divyaraja - Apr 18, 2012

HaileyStevens - Jul 23, 2011

M... - Jul 21, 2011



Click here to add your comment...



Greentea

Apr 19, 2012

share

World Mission Society Church of God believes in God the Father and God the Mother who have already come on the basis of the records in the bible.

According to the prophecy of the bible, only 4 our salvation, Chris Ahnsahngong nim have appeared from the east, farthest corner of the earth and let us know the existence of Heavenly Mother who is the source of eternal life so that we could get the hope 4 the kingdom of heaven. How great and thankful their love and sacrifice!

00068
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Second Amended Complaint ¶ 30(e) / Page 2

Christian, Assistance from Nonprofits - World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ - Aidpage

In order to deliver the love of Elohim God, the members of the Church of God stretch out their helping hands to those who are suffering from many difficulties throughout the world. We serve and care our neighbors with the heart of Mother. :)
If u wanna know more, plz visit here. <http://wmscog.org>

reply to Greentea



lovetheteachingofgod

Apr 18, 2012

share

Are there any grounds for that story?
It's a groundless story.
Actually, WMSCOG have done a good action. Blood donation and Clean campaign, etc.
Some people criticize WMSCOG with no evidence because they don't keep the teaching of the bible.
Therefore, if you wanna konw about WMSCOG properly, visit this site.
<http://wmscog.org>

reply to lovetheteachingofgod



HaileyStevens

Jul 22, 2011

share

Hello M... and thanks for commenting.

Before I respond, can you site a **credible** source for your information? Have you reviewed a transcript of the court case? If so, please forward a link or copy for me to review as well. Or is this someone else's interpretation of the court's ruling. I have found **your exact post** on the following blog site:

http://www.theultimatecomment.com/e107_plugins/forum/forum_viewtopic.php?575.20

Someone named "Julie" posted the exact comment that you did below, verbatim June 13, 2007 in the above blog.

Please respond with your own original ideas.

Thanks

reply to HaileyStevens

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Colón 64

Second Amended Complaint ¶ 30(e) / Page 3

Christian, Assistance from Nonprofits - World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ - Aidpage



M...

Jul 21, 2011

share

in response to HaileyStevens... Recently, the Supreme Court has ruled that some Christian denominations' accusations against the World Mission Society Church of God (Chief Pastor Kim Joo-Cheol) are dishonest criticism with no evidence, but groundless slander based on religious prejudice.

The guilty party, whose surnames are Jeong, Kim, Park and Lee, held rallies in front of the Church of God buildings, holding picket signs which read, "The Church of God preaches a time-limited eschatology, wrecks families, and promotes people to leave homes and get divorced." On November 23 and 24, 2006, the public trial for Jeong, Kim, Park and Lee was held, and the Supreme Court judged that their accusations against the Church of God had no ground, and rejected their appeal.

During the trial, all four men insisted that their accusations were true, submitting materials from magazines such as "Modern Religion" and "Church and Faith," as well as materials from the Christian Counsel of Korea and the press. They even brought in Pastor Choi, the Head of the Heresy Counsel Office of the Christian Counsel of Korea, as a witness.

However, the District Courts in Seoul and Incheon concluded that the accusations all four men made were from their own religious prejudice. The guilty party hadn't shown any specific materials or objective evidence to support their claim that the Church of God had preached or was still preaching a time-limited eschatology. They only repeated that the Church of God believed in a man as God, kept the Sabbath and the Passover, and wrecked lots of families through its doctrines. Finally, the District Courts concluded that all the accusations of Park, Lee, and Kim were false and that they had defamed the Church of God, and the Supreme Court also rejected their appeal.

In the case of the guilty party whose surname is Jeong, the District Court in Suwon judged that he defamed the Church of God with his false accusations, but declared him not guilty, saying that there was some reason why he had to believe the accusations against the Church of God were true. However, the Supreme Court did not agree with the original judgment of the Suwon District Court, but ruled that the argument of Jeong was groundless. Below is a part of the written decision of Jeong.

"Every following fact is proven to be true: 1) When the wife of

00070
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Colón 65

Second Amended Complaint ¶ 30(e) / Page 4

Christian, Assistance from Nonprofits - World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ - Aidpage

Jeong began to attend the Church of God in 1998, he physically abused his wife and intimidated her into not going to the Church. 2) Only for the reason that she went to the Church of God, Jeong committed violence against the Church's members, vandalized the Church's property, and spread lies such as that there was an increase in the number of the husbands who were victimized by the Church, by inserting pamphlets of their false accusations into newspapers as a type of advertisement. But as the Church of God lodged a protest against him, he presented a written apology and a written oath to the Church. 3) However, afterwards he took his wife to the S. church, of which the pastor is J who calls himself a heresy researcher, and forced her to receive an unwanted conversion education from J, and he even confined her in a mental hospital for 85 days. 4) As she didn't change her religion despite all of his attempts, he filed for divorce on December 11, 2001, and she also filed for divorce as a countersuit. Their divorce was completed on June 27, 2002. Now, the Supreme Court concludes that Jeong is the one who has wrecked his family, by forcing his wife to change her religion in extreme ways such as physical abuse, intimidation, and confinement in a mental hospital. There is no evidence that the Church of God or its members encouraged their divorce, or that the doctrines of the Church of God had connection with their divorce. And also there is no objective evidence which can prove his insistence that hundreds of families have been wrecked. Therefore, what Jeong claimed has been proven false."

With the decision, the Supreme Court annulled the original decision. The written judgment also reads, "Jeong has become a staff of the S. church and taken lead in forcing the members of the Church of God, whom he regards as heretics, to convert, through illegal activities. And Jeong said that he would continue his actions against the Church of God until every lawsuit between the Church, or its members, and him was settled. He spoke the things stated above in public in front of a Church of God building, and many people? whether they were concerned with the Church of God or not? became misinformed. In addition, his accusations against the Church of God or its doctrines were unjust criticism. He only made a guess and accused the Church, using slanderous expressions which defamed the Church of God or its members, and made people feel that the Church of God was a group which wrecked families. Therefore, the Supreme Court cannot say that his behavior was only for the benefit of the public."

As the judgment has proved that some Christian denominations' accusations against the Church of God were false, the ongoing dispute between the Church of God and

00071
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Colón 66

Second Amended Complaint ¶ 30(e) / Page 5

Christian, Assistance from Nonprofits - World Mission Society Church Of God A Nj Nonprofit Corporation, Ridgewood, NJ - Aidpage

other denominations, which insisted that the Church of God was heretical, finally ended.

A pastor from the Church of God said, "They are spreading lies concerning personal information of the Second Coming Christ Ahn Sahng-Hong, who founded the Church of God , and of Zahng Gil-Jah the New Jerusalem Mother. They also claim that the Church of God 's eschatology was proven wrong by Christ Ahn Sahng-Hong's not coming back in 1988 after he died in 1985 even though he had promised to come back. But all these are mere conjecture and slander from their own religious prejudice and exclusivism."

Through the judgment of the Supreme Court, it is proven that spreading lies to defame other religious bodies is beyond the freedom of criticism, and even illegal. This judgment is a good example to prevent spreading lies when people make false accusations against other denominations.

reply to M...



HaileyStevens

Jul 5, 2011

share

This "church" believes that a dead Korean man and a living Korean woman are "gods". They destroy families. Please avoid this place at all costs. Members are going door to door and will try to recruit new members in shopping malls, college campuses, events that they sponsor. They will ask you if you have ever heard of a "mother god". They also have a location at 305 Godwin Avenue in Ridgewood, NJ. Beware! Go to www.examinethewmscog.com for more info.

reply to HaileyStevens



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00072
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Colón 67

Second Amended Complaint ¶ 30(h) / Page 1

World Mission Society Church of God in Santee, CA 92071 - Chamber of Commerce

For Businesses: Sign Up (FREE) | Sign In | Feedback



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(E.G. DENTIST, SPA)

(CITY, STATE, OR ZIP)



FIND A BUSINESS CHAMBER SEARCH ADVICE BUSINESS TOOLBOX ADD YOUR BUSINESS FAQ

Home » California » Santee » World Mission Society Church of God

	<p>World Mission Society Church of God 9230 Prospect Ave Santee, California 92071 (619) 448-0899</p>	<p>BUSINESS LOCATION</p>	<p>HOURS OF OPERATION: No hours available for World Mission Society Church of God</p>
<p>REVIEWS 4 ★★★★★ BASED ON: 9 REVIEWS RATE IT!</p>		<p>CATEGORY: Ethnic Specific Churches Presbyterian Churches Church of God</p>	
<p>PRINT SAVE TO FAVORITES DIRECTIONS CLAIM THIS BUSINESS</p>			

ABOUT US:

World Mission Society Church of God is located at the address 9230 Prospect Ave in Santee, California 92071. They can be contacted via phone at (619) 448-0899 for hours and directions.

World Mission Society Church of God has an annual sales volume of ..

World Mission Society Church of God provides Marriage Counseling, Weddings and Baptisms to its customers. For maps and directions to World Mission Society Church of God view the map above. For reviews of World Mission Society Church of God see below.

Services: Marriage Counseling, Weddings, Baptisms, Christian Counseling, Counseling, Communion

Additional information

Services Synonyms: Marriage Ceremonies, Eucharist, Christenings

Programs Offered: Prayer Groups, Adult Programs, Missionary Programs, Bible Study, Youth Programs

Programs Offered Synonyms: Bible Teaching, Middle School Programs, Bible Based, Junior High Programs, Bible School, Bible Believing, Bible Class, Prayer Meetings, Youth Ministry, Bible Centered, Missions Programs

Last Updated: 12/12/2012

USER REVIEWS:



WED, AUGUST 22, 2012 - 10:17 AM EST
POSTED BY: JULIA

★ RATE THIS BUSINESS

WMSCOG is preaching Mother's Love

The World Mission Society is so goooood Church. Although some people criticize WMSCOG because WMSCOG and them are not same. However, WMSCOG is true church in this age and

00073
P

Colón 68

Second Amended Complaint ¶ 30(h) / Page 2

World Mission Society Church of God in Santee, CA 92071 - Chamber of Commerce

they keep the all commendment of God through the bible. Visit this site, plz. <http://wmscog.org>

RATING: ★★★★★



MON, AUGUST 20, 2012 - 10:12 AM EST

POSTED BY: IRIS

WMSCOG practices God's love :)

World Mission Society Church of God practices God's love. WMSCOG is doing various activities for the people, the society and the Earth. Keeping the Passover of the New Covenant which God established to save us, WMSCOG is conducting 'Blood Donation Relay' to save life and 'Worldwide Cleanup Campaign' to save the Earth. Many people are coming to WMSCOG which practice God's teaching. Plz visit WMSCOG, if you want to know more about WMSCOG and God's truth. <http://www.youtube.com/user/wmscognews?feature=watch>

RATING: ★★★★★



SUN, AUGUST 19, 2012 - 12:03 PM EST

POSTED BY: KAREN

Actions speak louder than words.

We can recognize which church is following God by the church that has God's commandment (Matt. 7:21). So God gave us the Bible to figure out what is the God's commandment and isn't. This is why the World Mission Society Church of God keeps the Sabbath on Saturday as from Jesus' own example (Luke 4:16), Passover and all of the Feasts of God (Lev. 23). So, we can easily recognized that the World Mission Society Church of God is only church that truly follows God and will lead us to the kingdom of heaven.

RATING: ★★★★★



SAT, AUGUST 18, 2012 - 3:07 AM EST

POSTED BY: PATRICK

Good to Great

I know some about this religious organization. volunteer words of this church all over the world have been a topic especially environmental clean-up campaigns. As its name is World Mission Society Church of God, the clean-ups have been done simultaneously in 150 countries. This is what I saw on TV news. This church, I believe, deserves to win a president's award, Lifetime. Hope that it continues its efforts to help others and communities :-)

RATING: ★★★★★



FRI, AUGUST 17, 2012 - 10:29 AM EST

POSTED BY: KUMAR

The most beautiful Church, WMSCOG

As I heard, World Mission Society Church of God serves and cares others as if they were their own family so they are very enthusiastic for volunteer activities. It's really hard but they always do their best. How beautiful it is! Hope that WMSCOG will continue to be a bridge that connects the world as one thru the true love of Elohim God. :D

RATING: ★★★★★



FRI, AUGUST 17, 2012 - 9:19 AM EST

POSTED BY: SUMMER

WMSCOG and Activity

World Mission Spociety Church of God is trying various campaigns all over the world! Of course, voluntarily! Blood donation, clean-up campaign, and so on. So, WMSCOG was reported several times on newspaper or T.V. <http://vimeo.com/45816859> http://www.youtube.com/watch?v=3mlVGQ4-0Rs&feature=youtube_gdata&noredirect=1

RATING: ★★★★★



FRI, AUGUST 17, 2012 - 8:00 AM EST

POSTED BY: ROSE

World Mission Society Church of God

World Mission Society Church of God was established by Christ Ahnsahnghong in Korea in 1964. Currently, there are around 2000 churches in approximately 150 countries with about 1.6 million registered members. Through the charity concert for the earthquake victims in Haiti, they were attracted by the public and they also have donated around \$100000 to UN. Since then, World Mission Society Church of God has been keeping the mutual cooperative ties with UN. In 2011, US President Barak Obama awarded the church a prize in recognition of its contribution to the society.

RATING: ★★★★★

00074

Colón 69^P

Second Amended Complaint ¶ 30(h) / Page 3

World Mission Society Church of God in Santee, CA 92071 - Chamber of Commerce



WED, AUGUST 8, 2012 - 11:53 PM EST
POSTED BY: JOHNSON

World Mission Society Church of God is the true church.

World Mission Society Church of God is the true church. WMSCOG follows only God's will that Jesus set up the New Covenant for his disciples 2000 years ago. Also WMSCOG practices the love of God. <http://wmscog.org>

RATING: ★★★★★



TUE, JULY 5, 2011 - 4:05 PM EST
POSTED BY: HAILEY

Beware of this religious cult!!!

Avoid this religious cult at all costs!!! They will destroy your family and take all of your money. They believe that a dead Korean man and a living Korean woman are "gods". Do your research and be informed of their tactics. Visit www.examinethewmscog.com for more info.

RATING: ★★★★★

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TOP CITIES: ATLANTA | BRONX | BROOKLYN | CHICAGO | CLEVELAND | DALLAS | DENVER | DETROIT | HOUSTON | LAS VEGAS | LOS ANGELES | MIAMI | MINNEAPOLIS | NEW YORK | PHILADELPHIA | PHOENIX | SAINT LOUIS | SAN ANTONIO | SAN DIEGO | SAN JOSE

TOP SEARCHES: ATLANTA | BRONX | BROOKLYN | CHICAGO | CLEVELAND | DALLAS | DENVER | DETROIT | HOUSTON | LAS VEGAS | LOS ANGELES | MIAMI | MINNEAPOLIS | NEW YORK | PHILADELPHIA | PHOENIX | SAINT LOUIS | SAN ANTONIO | SAN DIEGO | SAN JOSE

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Colón 70

Second Amended Complaint ¶ 33 / Page 1

Cult Education Forum :: "Cults," Sects, and "New Religious Movements" :: Ahnsahngong

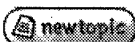


Cult Education Forum

Forum List Message List Search
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Ahnsahngong

Goto Page: Previous 1 2 3 Next



Index -> "Cults," Sects, and "New Religious Movements"

June 26, 2011 11:22PM

Hailey
Date Added: 06/26/2011
Posts: 15

Here is a video that discusses the connections between the World Mission Society Church of God and Big Shine Worldwide Inc.

[www.youtube.com]

Go to www.guidestar.org and register for free to download your own copy of the World Mission Society Church of God's IRS Form 990 filed in 2008 for the Bloomingdale, Illinois location.

Options: Reply To This Message Quote This Message

June 27, 2011 10:28PM

Hailey
Date Added: 06/26/2011
Posts: 15

I would like to expose the inconsistencies between what the World Mission Society Church of God says and what they report to the IRS. Attached is the first page of the WMSCOG California's application for tax exempt status or form 1023. Click on this link in order to fill out your own request for the 1023 that the WMSCOG filed in 1999:

[www.irs.gov]

The IRS will send you a copy free of charge, but be patient because it takes approx 2 months to come in the mail.

Please note the Employer Identification Number in the upper right corner when requesting a copy from the IRS.

I will point out inconsistencies from their 1023 in the next few posts. (I can attach only one jpg at a time).

Attachments: WMSCOG CA 1 Resize.jpg (119KB)

Options: Reply To This Message Quote This Message

June 27, 2011 11:03PM

Hailey
Date Added: 06/26/2011
Posts: 15

THE WORLD MISSION SOCIETY CHURCH OF GOD LIES ABOUT HOW THEIR CHURCH WAS FOUNDED ON THEIR APPLICATION FOR TAX EXEMPT STATUS!

When asked for a brief explanation of the history of how the WMCOG was formed, the WMSCOG responded:

"The World Mission Society Church of God, was founded by the founding father, Pastor Joo Cheol Kim in or about 1998 as a result of a divine revelation from God. Pastor Kim had a message from God commanding him to preach the word of the living God to "all the world". In the vision he was told to keep the faith of the holy apostles of Jesus Christ and to bring the message of God to all of mankind."

00076
P

Colón 71

Second Amended Complaint ¶ 33 / Page 2

Cult Education Forum :: "Cults," Sects, and "New Religious Movements" :: Ahnsahng Hong

THERE IS ABSOLUTELY NO MENTION OF AHNSAHNGHONG!!! Why would they tell a different story on their application for tax exempt status? If they believe that Ahnsahng Hong is God, how is this not a slap in the face? There is also no mention of Zhang Gil Jah! Apparently they aren't even sure as to when Joo Cheol Kim has this "divine revelation" because they state "in or about 1998". Really?!!! What happened to Ahnsahng Hong establishing the church in 1964?!!! This doesn't make any sense. So "god's church" lies to the IRS on their application for tax exempt status? Shouldn't the "mother god" have stopped them from doing this? If she is "god" then she should be fully aware of the false statements they made right? Why doesn't the "mother god" make them file an amendment to correct the history of their own organization? This just doesn't make any sense. I would like to see the WMSCOG respond and attempt to rationalize this. More to come on this application.

Attachments: WMSCOG CA 2 Resize.jpg (105.2KB)

Options: Reply To This Message Quote This Message

June 27, 2011 11:13 PM

Hailey

Date Added: 06/26/2011

Posts: 15

Attached is another pic of the page that asks if the World Mission Society Church of God will license or ordain ministers and what the requirements will be. Here is the WMSCOG's response:

"Must be baptized in the name of Jesus Christ. Must study the Bible for six months intensely. Must experienced Gospel Ministry for 3 years and attended worship for at least one year."

BAPTIZED IN THE NAME OF JESUS CHRIST?!!! Why no mention of the requirement to be baptized in the name of Ahnsahng Hong?!!! Another slap in the face for their "god". Why would the WMSCOG deny their belief that people need to be baptized in the name of Ahnsahng Hong in order to be saved? The WMSCOG believes that a person must celebrate the Passover in order to receive salvation from God and baptism is a pre-requisite to the Passover.

More to follow...

Attachments: WMSCOG CA 3 Resize.jpg (110.1KB)

Options: Reply To This Message Quote This Message

June 27, 2011 11:13 PM

Hailey

Date Added: 06/26/2011

Posts: 15

In the attached picture, the World Mission Society Church of God describes its activities. The WMSCOG states:

"Prayer services to strengthen the faith of the members in the works of the savior Jesus Christ"

Really?! I thought that we were in the age of the holy spirit and unless you have faith in Ahnsahng Hong and Zhang Gil Jah, you cannot be saved.

"Baptismal services, to set the devoted members into holy communion with their LORD and Savior Jesus Christ."

Again, NO MENTION OF AHNSAHNGHONG!

"Baptismal services will be scheduled on a monthly basis to welcome new members to christian way of life and onto the path of salvation."

On a monthly basis?! Anyone who has been to the WMSCOG knows that baptisms are conducted every day and at any time.

00077

"Funeral services to escort those members of the church who have been called upon by the Lord

Colón 72

Second Amended Complaint ¶ 34

Cult Education Forum :: "Cults," Sects, and "New Religious Movements" :: Ahnsahngong

Hailey

Date Added: 06/26/2011

Posts: 15

Note the attached file. Refer to the 3rd question down that asks, "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?

The next question asks, "Is the organization the outgrowth of (or successor to) another organization, or does it have a special relationship to another organization by reason of interlocking directorates or other factors?". Again, the WMSCOG answers "NO". In the application for tax exempt status for the California location, the WMSCOG states that the "founding father" of the organization is Joo Cheol Kim. Yet the WMSCOG denies that they have any relationship to another organization despite having a clear connection to the WMSCOG in California. Why?

See the 2nd attached file. The "higher ups" of the World Mission Society Church of God have a clear connection to the "higher ups" of a company called Big Shine Worldwide, Inc. Big Shine Worldwide, Inc is a multi-million dollar electronics company that is owned by Dong IL Lee, aka pastor Daniel Lee of the Ridgewood, NJ WMSCOG location. Here is the website:

[www.bigshine.com]

The 2nd file I attached is the business status report for Big Shine Worldwide Chicago. Note that the secretary of Big Shine Worldwide, Inc is none other than Jae Hoon Lee, aka pastor Jacob Lee, of the WMSCOG in Bloomindale, IL. I believe that he is the pastor for the Naperville, IL location these days.

I will explore further connections between the WMSCOG and Big Shine Worldwide, Inc in the next few posts.

Attachments: WMSCOG IL 2 Resize.jpg (87.2KB) bigshineworldwideil-001.jpg (48.6KB)

Options: Reply To This Message Quote This Message

Hailey

Date Added: 06/26/2011

Posts: 15

Note the Founding Directors listed the Bylaws that the WMSCOG submitted with their application for tax exempt status.

- Joo Cheol Kim (President)
- Hoon Jae Lee or Jacob Lee (Executive Director) ****also secretary of Big Shine Worldwide Chicago
- Joung Wook Kang
- Dong IL Lee or Daniel Lee (Director) ****also CEO of Big Shine Worldwide, Inc.
- Kwang Min Park (Director)
- Jae Ho Lee (Auditor)

I have included the business entity status report for NJ so that you may confirm that Dong IL Lee is in fact the owner of Big Shine Worldwide in NJ as well.

Why such a strong connection to a Big Shine Worldwide? Why is this information kept a secret? It just so happens that Big Shine Worldwide, Inc has branches in many countries that the WMSCOG also has locations like Australia, UK, Canada, Malaysia, and S. Korea of course. Check it out on the bigshine.com/worldwide website.

Back to the 1023 application for tax exempt status...

Attachments: BEStatRpt Big Shine NJ1.png (60KB) IL Bylaws Signature Page Resize2.jpg (75.8KB)

Colón 73

Second Amended Complaint ¶ 36

Cult Education Forum :: "Cults," Sects, and "New Religious Movements" :: Ahnsahngong



Cult Education Forum

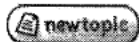
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Ahnsahngong

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Index -> "Cults," Sects, and "New Religious Movements"

July 03, 2011 06:55PM

Hailey
Date Added: 06/26/2011
Posts: 15

Included in the World Mission Society Church of God Bylaws submitted to the IRS as part of their application for tax exempt status, in information regarding membership to their organization.

First, according to their bylaws, there are two types of membership (see attachment 1):

"Active Member. One to agrees to the purpose of the church and joins it."

"Honorary Member. One who made a special contribution to the Church or one with knowledge and experience as recommended by the society.. One who wishes to join the society shall apply by submitting a certain form for approval."

I would assume that the active member is one who is baptized and agrees to follow all of the regulations of the church (passover, sabbath, etc).

But who are the honorary members? What kind of "special contribution" does one have to make in order to receive this "honorary membership". Does salvation come with this kind of membership too?

Second, according to Section 6 of their bylaws, members must pay dues.

Are these the tithes? or freewill offerings? Interesting how they choose to include a no refund policy.

The worst part is that in Section 7 the WMSCOG admits that members will be "withdrawn" if they have not paid their membership dues for longer than a year for no good reason. If you ask WMSCOG members if they are required to pay certain amounts to the church, do they admit it? Do they admit that they kick members out for not paying?! The WMSCOG also kicks people out for "damaging the reputation" of the Church. That means that even if you say something negative about the WMSCOG, even if it's true, you get kicked out.

The WMSCOG seems to go to great lengths to protect their image. Yet another characteristic of a destructive mind control cult.

Attachments: [Membership 1 Resize1.png \(37.8KB\)](#) [Membership 2 Resize1.png \(38.8KB\)](#)

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July 04, 2011 10:16PM

Hailey
Date Added: 06/26/2011
Posts: 15

Here is the address to the location in Georgia:

5932 Williams Rd.
Norcross, Ga 30093

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Colón 74

How The WMSCOG Turned My Life Upside Down Part 1 – How I Got Involved – A For... Page 3 of 4

- [How To Become A Cult Leader](#)
- [Former New York WMSCOG Member's Experience - Part 1](#)
- [Personal Experience With WMSCOG Recruiters At A Shopping Mall](#)
- [A Christian Response to the World Mission Society Church of God](#)
- [Women and Religious Cults - WE TV Documentary](#)
- [Cult Explosion: Cults Exposed By Those Who Escaped](#)

Former Member Testimony July 22, 2011 9:41 PM

How The WMSCOG Turned My Life Upside Down Part 1 – How I Got Involved – A Former Member's Story

[Translate]

We recently asked [one of our correspondents from New Jersey](#) to send us the story of her experience in the [World Mission Society Church of God](#). What followed certainly did not disappoint. Following her through this five part journey, we learn how she was recruited, the questions that began to unravel her beliefs, an her final exit. Unfortunately, some of what she went through is not uncommon in stories we hear from other [former members](#). Perhaps her experience is not unlike your own? Without further delay...

I first visited the World Mission Society Church of God in Ridgewood, NJ for the first time back in October of 2009 after being invited by two co-workers of mine. One of my co-workers told me that she had recently joined a church that she really enjoyed attending. My other co-worker, having been a member of the WMSCOG for three years, didn't mention any details about the organization's beliefs either. One day I asked my co-workers if I could visit the church with them. I was surprised that they suggested that we go that very night and offered to pick me up. I found this a bit strange because I expected that I would have to wait for a specific day to visit the church for a service or something.

I remember that it was a Monday night around 7:30 pm when I arrived at the WMSCOG with my two co-workers, not knowing what I was getting myself into. I was greeted by a few smiling faces at the front desk, which they call "admin", and given an application to fill out. The application consisted of a few basic questions like what my religious background was and if there were any specific questions I had about God or the Bible. Then I was introduced to a missionary that would teach me my first Bible study lesson. The four of us went to a small room that had a dry erase board and a small table with a few chairs. My first lesson was about the Saturday Sabbath. Being somewhat of a conspiracy theorist, in about 30 minutes I was convinced that all of my life I had been deceived into going to church and worshipping the Lord on the wrong day! I was told that Constantine, a Roman Emperor, abolished the Sabbath and forced Christians to worship on Sunday and thus worship the pagan sun "god". Then I was asked if I would like to do another study, so I said sure why not.

The missionary asked me if I thought that I was going to heaven. I answered that I hoped that I would be saved and allowed in to heaven. I mean I thought that I was generally a good person, no one is perfect, and I worked in a field where I helped people every day. She would soon prove me wrong. The missionary began to explain that humans were angels that had been kicked out of heaven for sinning against God. As we flipped back and forth through the Bible, which I admit I wasn't very familiar with at this point in my life, I became convinced that I had committed a sin against God in heaven that afforded me the "death penalty" on earth. I found it strange that we continued flipping back and forth through the Bible, ignoring the context around any of the verses, but it somehow seemed to make sense at the time. So then the question was, what do I do in order to be saved and allowed into heaven? She explained that baptism was the first step and that despite having been baptized into a Catholic church as a child, that previous baptism did not count because Catholics worship on Sunday. After all, I had just learned that Sunday worship was really pagan sun "god" worship right?

Then the missionary asked me if I would like to get baptized. Since I was impressed with the way that I was able to "understand" the Bible all of the sudden, I agreed. I was then taken to another room down the hall where there was what looked like a large stand-in shower, given a robe-like top and shorts to wear, and asked to change. After I changed I was asked to kneel in the shower while a Deacon that I had never met poured water over my head and baptized me in the name of Jehovah, Jesus, and then another name I had never heard before. Since the Deacon was Caucasian, I had no idea that what he said was actually in Korean. While this was going on my friends were singing in the room with veils on their heads. I thought that this was weird but since my co-workers, who I had also befriended and trusted, seemed happy I didn't think to ask.

After I changed back into my normal clothes, I was taken in to another room in the same hallway, to partake in the "Passover bread and wine". I was shown a few verses in the Bible where Jesus said that we must eat his flesh and drink his blood in order to have eternal life. So I said to myself, "who doesn't want eternal life?" and did as I was told. Then the Deacon brought out this huge book and asked me for my name, address, phone number and next to my info he wrote down the names of my two co-workers.

Next, I was told that after baptism they always take a picture of the new member. I jokingly said, "oh great after my hair is wet and make-up is smeared". One of my co-workers told me not to worry, that I "looked great", and that it was just for their records. I reluctantly agreed and let them take a polaroid of me.

As my co-workers and I were leaving, they asked when I would be returning to continue to study. I answered that I wasn't sure because I was taking dance classes on some evenings during the week. I was told that I could return at any time during the week so I didn't feel pressured to return right away.

We are very familiar with the studies concerning [whether we were angels in heaven before](#). In fact, we have an [entire section](#) devoted to just that topic. The [articles](#) therein demonstrate how we were [not](#) angels in heaven before.

In [part 2](#) of her story, we'll learn how our friend slowly felt pressured to spend more and more time at the [WMSCOG](#).

Related Posts

- [Thought Reform](#)
- [How The WMSCOG Turned My Life Upside Down Part 5 - My Marriage Destroyed - A Former Member's Story](#)

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- [How To Become A Cult Leader](#)
- [Former New York WMSCOG Member's Experience - Part I](#)
- [Personal Experience With WMSCOG Recruiters At A Shopping Mall](#)
- [A Christian Response to the World Mission Society Church of God](#)
- [Women and Religious Cults - WE TV Documentary](#)
- [Cult Explosion: Cults Exposed By Those Who Escaped](#)

Former Member Testimony | July 23, 2011 10:45 AM

How The WMSCOG Turned My Life Upside Down Part 2 – The Creeping Time Commitment – A Former Member's Story

[Translate]

In part one, of our five part series we learned how our correspondent from New Jersey was recruited into the World Mission Society Church of God. Now, read part two below to learn how her time commitment and involvement was slowly encouraged to increase...

After being a member for about two weeks, I invited my boyfriend of about one year to come to the church for a Bible study. Things were rocky between us at the time and I thought that going to church together and learning more about God might help. He seemed a little reluctant at first, but he agreed. I was allowed to be present during my boyfriend's first study with a WMSCOG Deacon. He also opted to be baptized immediately after his first study about the Sabbath.

Soon after we began attending Tuesday and Saturday services and occasionally visiting during the week for a study. After all, we had a list of about twelve basic studies to complete. We would study separately from now on. I noticed that married couples and families did not study together unless there was a longer study being offered on a Sunday afternoon. Even during these 6 hour long studies, women and men sat separately. I remember finding it strange that women and men were seated on opposite sides of the sanctuary during worship times as well. I was told that the seating arrangement was to prevent gossip, distractions, and men looking at women with a romantic interest or vice versa. One of the members said, "this way we only focus on God". It didn't take long for the seating arrangement to seem normal. During one of the services I attended, I remember the pastor mentioning how outsiders find this seating arrangement weird. Then he shouted "but brothers and sisters, we don't find Zion customs weird right?" This was followed by everyone shouting "Amen!"

For about two months we only attended one of the three services held on Saturdays. I remember being surprised to find out that most members spent their entire Saturday, from about 9 am to 10 pm, in the church attending services and in between, studying the Bible, watching videos (usually about Zhang Gil Jah or disasters), or reading books written by Ahn Sahng Hong and others. I remember asking someone there why it was necessary to spend all of Saturday in the church. The "older sister" replied that "God commanded the Sabbath day not the Sabbath hour or one Sabbath service". This topic would be touched upon during services as well. I remember one of the missionaries mentioning that members of strong faith don't question the amount of time you are supposed to spend in the church on the Sabbath. I started to view these subliminal messages during services as ways to suggest feelings of guilt among members. I decided to keep my concerns about this to myself. It didn't take long for the pressure to build, so we started attending two services on Saturdays.

Shortly after, I began receiving text messages on Fridays or Saturdays from the "older sister" assigned to watch over me, asking what time I would be there for service. My boyfriend would receive the same from one of the "older brothers" assigned to watch over his progress. This "buddy system" that I observed seemed increasingly odd as the frequency of the text messages increased to every day. I remember being at work and getting a text message that read something like "GBU sister, when do you think you will be coming to Zion to continue your Bible studies?" Again, I felt that this was more pressure to spend more time in the church.

Two months into my membership at the WMSCOG, my boyfriend did something that really hurt our relationship. I went to the pastor for guidance on the situation and he advised my boyfriend and I that it was not good to be together and that we should be with other people. He suggested that if we loved one another and wanted to be together, then we should get married. Despite how heartbroken I was, I forgave my boyfriend. Four months later we were engaged. Four weeks after that, we bought a foreclosed home that required a lot of construction. So between work, the construction, and planning the wedding that would take place four months later, we really didn't have much free time. My now fiancé also worked part time a few nights per week. We were both completely overwhelmed but we continued to spend as much time in the church as possible.

After a while, Saturdays were not enough. We were pressured to return on Sundays too. The WMSCOG holds what they call a "preaching assembly" on Sunday mornings followed by recruiting for the rest of the afternoon. When members return, they typically spend more time in the church studying. Those members that were not experienced enough to go out recruiting would attend an approximately 6 hour long group study. There were also times when members would gather on Sunday evenings to watch movies that were determined by the WMSCOG to have some "spiritual" content.

And then there were the feasts during which members were required to attend services at 5 am and then again at 7:30 pm for sometimes 10 days at a time. I tried the 5 am services but it was nearly impossible for me considering that I normally went to bed around 2 am. So I would attend the 7:30pm services despite being exhausted after a long day at work.

During the first year of my membership at the WMSCOG, my family was quite concerned with the amount of time that I was spending at the church. I tried numerous times to get my family to join the church with me to no avail. I was initially disturbed by their resistance because I really believed in the WMSCOG's claim that one could not be saved without their many requirements (Sabbath, Passover, other feasts, etc.). I was told by my "older sisters" not to worry and that God will make them come if I provide a good example for them to follow. I soon found myself feeling pressured to choose between the WMSCOG and my family. I remember telling my sister that I could not attend my nephew's birthday party because it was on a Saturday. I dropped off a gift and went on my way to the church for the rest of the day. I regret this now. But this would only be the beginning of conflicts with my family due to my involvement with the WMSCOG.

The creeping time commitment is a big concern we hear from others who have loved ones in the WMSCOG. In part 3, we'll learn of the astonishing Biblical contradiction and the surrounding events that led to our correspondent's dramatic exit.

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- [How To Become A Cult Leader](#)
- [Former New York WMSCOG Member's Experience - Part I](#)
- [Personal Experience With WMSCOG Recruiters At A Shopping Mall](#)
- [A Christian Response to the World Mission Society Church of God](#)
- [Women and Religious Cults - WE TV Documentary](#)
- [Cult Explosion: Cults Exposed By Those Who Escaped](#)

Former Member Testimony | July 25, 2011 11:08 PM

How The WMSCOG Turned My Life Upside Down Part 3 – Why I Left – A Former Member's Story

[Translate]

In parts [one](#) and [two](#), of this [five part series](#) from our correspondent in New Jersey, we learned how she was first recruited into the World Mission Society Church of God, and how the pressure to spend more time at the organization slowly increased. In part three below, we'll learn the blatant Biblical contradiction she discovered that led to her dramatic exit. We've taken the liberty of adding some relevant annotations between square brackets [].

Before my husband and I left for our honeymoon, the pastor advised us to pray during the service times and spend the Saturday that we would be away, reading a book written by Ahn Sahng-hong. My husband and I agreed and we were off on our way to Mexico. Little did I know, that would be the last vacation we would spend together.

When we returned, the pressure to spend more time in the church increased even more. There was also a huge focus on "bearing ten talents" or recruiting. I remember going out with "sisters" to "preach" to new members. I had a sense that we were targeting people in their 20s and 30s since we never approached anyone that appeared to be older than that. We always went to crowded areas like stores and shopping malls. I was told that crowded areas were best and we would get to talk to the most people. I had a difficult time with this because I didn't feel comfortable walking up to strangers and asking them if they had "ever heard about god the mother in the Bible". The rejection from most people didn't help. A lot of people would just walk away or tell us that they were atheists. Security asked us to leave after receiving complaints from customers.

A few months before the wedding, one of my friends sent me an email that refuted the WMSCOG's claim that Constantine abolished the Sabbath. This email had been bugging me for a few months and now that I had some time to think, I decided to do some research on the topic. I thought that it would be great to find some information that supported what I was taught during my first study about the Sabbath at the WMSCOG. I had trouble finding information in bookstores so I finally turned to the internet. I had avoided the internet after having heard that the internet was evil and considered by the WMSCOG to represent the modern day "tree of knowledge of good and evil" [[more info on this](#)]. A simple google search and I was lead to an article titled "Did Constantine Abolish The Sabbath In 321 AD?" [For our readers, she is referring to [this article](#)]. I was shocked to find out that Christians had been worshipping on Sunday long before Constantine was even born. So Constantine didn't abolish the Sabbath did he? The WMSCOG's studies that I thought were rock-solid seemed to be starting to crumble one at a time.

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. [For our readers, she is referring to [this article](#)].

I discussed the information that I had come across on the computer with my husband that evening after work. He was in his second day of a three day fast. I cannot recall the occasion for the fast, but fasting at the WMSCOG means no food or water. Participation in the fast is expected from all members including children and infants. I remember hearing a "sister" explaining "my baby needs salvation too". I found this outrageous so I refused to participate.

It was a Tuesday evening so we were scheduled to attend the 3rd day service. After confronting my husband with the information that I found on the internet, he was shocked too. He admitted that we had been fooled and wondered why an organization would take advantage of people like this. He said that he felt "lost" and didn't know where to go now. He was starving so we went to dinner and decided not to attend the service that evening. The WMSCOG takes attendance during services so it was soon obvious that we did not show up. We were both contacted that evening regarding our absence and I remember replying something to the effect that I had found some information on the internet that caused me to consider whether or not we would be returning. We were encouraged to attend a meeting with the pastor where all of our questions about the information on the internet would be answered. We were assured that the negative information on the internet was all lies.

My husband and I went to the WMSCOG a few days later to meet with the pastor. When we arrived in his office there were three other WMSCOG members present (a deacon, a deaconess, and another male member). The meeting started with an explanation of how people persecute the WMSCOG on the internet by spreading lies about "father and mother". I was assured that all of my questions would be answered.

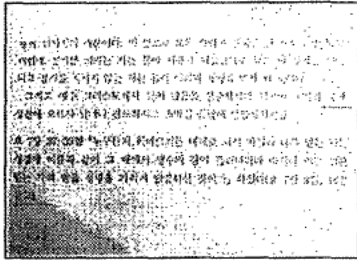
I remember asking the pastor why members in the WMSCOG had separated from their non-believing spouses. After all, the girl who recruited me had just left her husband because he decided to stop attending the church. I pointed out how in 1 Corinthians 7, the apostle Paul states that married members of 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

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How The WMSCOG Turned My Life Upside Down Part 3 – Why I Left – A Former Me... Page 4 of 5

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.

I then pointed out the contradiction from "The Mystery of God and the Spring of the Water of Life" pg. 465 where Ahnsahnghong writes "Jesus Christ went up to the temple and preached every day during the Feast of Tabernacles,..." In the Bible (John 7:14) it says that Jesus did not preach in the temple courts until the middle of the Feast of Tabernacles. The WMSCOG believes that Ahnsahnghong and Jesus are the same like water exists in three chemical forms (solid, gas, liquid) so does God (Father, Son, Holy Spirit). But how could Ahnsahnghong and Jesus be the same and tell different versions of the same story? Did Jesus preach every day of the feast or did He wait until the middle of the feast? It cannot be both because God does not make mistakes. The deacon explained that "Jesus preached every day". I pointed out that in the beginning of John 7 it clearly explains the reason for Jesus having waited until the middle of the feast. In John 7, Jesus tells his brothers to go ahead of him to the Feast of Tabernacles, and afterwards travels in secret because He knows that people are looking for him to try and kill him. Jesus could not have traveled alone in secret, and preached during the 2 1/2 day journey (on foot) from Galilee to Judea. If Jesus traveled alone in secret, that obviously means that he was not telling anyone who He was right? It was at this point that the pastor explained the reason for the contradiction. The particular edition of the book was written in Korean on the left page and in English on the right. The pastor pointed to a word that was mistranslated, underlined it (중에), and explained that it was an error in translation. According to the pastor, the word he underlined (중에) should have been translated to "middle" instead of "every day". So therefore, according to the pastor there was no contradiction between Ahnsahnghong's writings and the Bible. He explained that the people who translated the books from Korean to English, made a mistake because English was not their native language. He assured me that he would be notifying the general assembly in Korea to correct the error. I was still skeptical at this point. Why wasn't I given that explanation in the beginning? [For our readers, by request, we asked our correspondent for a picture of the word in her book, and she sent us the photo below]:



I was determined to find out the truth about this alleged "mistranslation". A few days later, I asked my husband to drive me to a nearby town where many Korean folks live. I know it sounds crazy but I had to know. I approached random Korean people on the street and asked what the underlined word (중에) meant. Some just pretended that they didn't speak English probably because they thought I was trying to recruit them. Some didn't know enough English to tell me what the word meant. Some were too Americanized and didn't know enough Korean to read the word and tell me what it meant. I was becoming frustrated because it was around midnight at this point and I still hadn't found anyone to help me with the translation. I had just about given up when I found a couple in a diner that was willing to talk to me after I started the conversation with "I'm not trying to preach to you, I just need to know what this Korean word means in English". The gentleman that was willing to look at the book told me that the underlined word (중에) meant "during" and not "middle". He also pointed to a word in the next line that said "every day" (날마다). That meant that there was no error in the translation! Ahnsahnghong really did write that Jesus preached every day during the feast. I was completely shocked!!! That meant that the pastor lied to me. I couldn't believe that he would lie to me just to placate me.

When I told my husband what the Korean man in the diner said, he was less than moved. I couldn't understand why this seemed not to bother my husband. My husband ignored the blatant contradiction between Ahnsahnghong's book and the Bible, and continued to attend. [For our readers, there are many more contradictions between the writings of Ahnsahnghong and the Bible listed here]. Despite confirmation of the translation with Google, my husband was somehow convinced by a WMSCOG missionary that the word did in fact mean "during". I remember even asking one of the Korean "sisters" what the underlined word meant as I was in line to use the bathroom. She also told me that the word (중에) meant "during". Some time later my husband eventually admitted that the pastor did in fact lie to me, but excused his actions. According to my husband, the pastor lied to me in an attempt to "save" me. I don't understand why, but he continued to ignore the contradiction between Ahnsahnghong's statement and the Bible. I asked my husband why the pastor would point to Ahnsahnghong's writings and lie if the pastor believed that those words were written by "god". Would he point to the Bible and do the same? When did Jesus or any of his apostles lie to someone in an attempt to save them? Never.

The last service that I attended at the WMSCOG after this incident was a reality check for me. First, I was made to sit next to my husband, which is a big no-no in the WMSCOG. I was later told by a deaconess that "sometimes married couples sit together" though I had not observed this in the past year of my membership. Then toward the end of the service the pastor mentioned that it was only acceptable for new members who hadn't finished their studies to ask questions about contradictions they read on the internet. According to the pastor, if the member asked questions after having completed the basic studies, it was "stupid". I thought, wait a minute, didn't he just tell me a few days ago that I could come to him with any questions that I had and that they would be answered. Why would the pastor encourage me to ask questions and then call me "stupid" for doing exactly what he encouraged me to, in front of the whole congregation a few days later? Was this an attempt to humiliate me?

My husband later admitted to me that the seating arrangement had been made prior to my arrival in an attempt to keep me from "contaminating other sisters" with my doubts. So the deaconess lied to me too? At this point I felt manipulated and I had had enough of the lies and secrecy. I would not be returning to the WMSCOG. I wondered, and worried, what it would be like now that I had decided not to return to the WMSCOG and my husband had decided to remain a member.

Wow. We have no further comments. She said it all. What an incredible story of her dramatic exit from the WMSCOG. Can you believe what happened in that last service she attended? The audacity and rudeness is almost unbelievable. [How people stay in this group is mind boggling.](#) If you thought part 3 above was bad, wait until you read part 4 when the WMSCOG attempts to make her sign a document saying she can not talk about her experience. What is with these people? We're sure glad she didn't sign it, otherwise she wouldn't have been able to share her experience with the rest of the community here at www.examinethewmscog.com.

Related Posts

- [How The WMSCOG Turned My Life Upside Down Part 5 - My Marriage Destroyed - A Former Member's Story](#)
- [How The WMSCOG Turned My Life Upside Down Part 4 - The NDA - A Former Member's Story](#)
- [How The WMSCOG Turned My Life Upside Down Part 2 - The Creeping Time Commitment - A Former Member's Story](#)
- [How The WMSCOG Turned My Life Upside Down Part 1 - How I Got Involved - A Former Member's Story](#)
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Former Member Testimony | July 29, 2011 12:31 AM

How The WMSCOG Turned My Life Upside Down Part 4 – The NDA – A Former Member's Story

[Translate]

Previously we learned of our correspondent from New Jersey's dramatic exit from the World Mission Society Church of God (WMSCOG). In this fourth part, of her five part series, we learn how this organization tried to make her sign some kind of non-disclosure agreement (NDA) when they believed she had been questioning them on the Internet.

During my research on the World Mission Society Church of God, I came across various internet blog entries written by people who had family members involved in the group. Soon an obvious pattern emerged. I read story after story about how the WMSCOG had either ruined their marriage or family. Since my husband had decided to remain a member of the WMSCOG, naturally I became very concerned. I discussed my concerns with my husband and he promised me that he would not let the church come between us. Little did I know, the WMSCOG was well on its way in doing just that.

My husband would soon explain that he needed to spend more time in the church because he needed to "learn and study more". This of course made me furious because it appeared to be a blatant attempt to cannibalize all of my husband's time in order to keep him away from me. If the WMSCOG didn't allow me to sit next to the other "sisters" during the last service I attended in order to prevent me from "contaminating them with my doubts", how much more would they attempt to keep my husband away from me for the same reason?

The arguments between us increased and the time we spent together decreased. One night my husband told me that I was going to hell because I was no longer keeping the Sabbath. I thought that God was the only one that could decide that? I was furious. It seemed that my husband was looking down upon me like I was a lesser being because I no longer wanted to attend the WMSCOG. Soon he began going to the church every day after work and coming home after midnight. We were newlyweds and we rarely saw each other or spent any time together. I became increasingly frustrated and angry as time went on. Six months after I left the WMSCOG my husband was convinced that I was being "used by Satan" in order to try and stop him from going to the church so he moved out one Friday while I was at work. When I got home from work all of his things were gone. I couldn't believe he would do such a thing! I was completely devastated! It seemed like the WMSCOG was driving him crazy.

We sat down to talk during the evening on the day that he moved out. I explained to him that what he was doing was not Biblical. In the Bible, it states that marriage is a covenant, God hates divorce, and that a man should not leave his wife except for adultery. [Note to our readers, there is much controversy among Catholics and Protestants concerning the definition of the Greek word *porneia* used in [Matthew 19:9](#). Some view it as "adultery" while others view it as "illicit union". That argument is beyond the scope of this site]. In the year that I was a member, the topic of marriage and its importance was never discussed in the WMSCOG. He went on to explain that he could no longer live with me because my "message would spread like cancer" (quoting [2 Timothy 2:17](#) & version=NIV" target="blank">2 Timothy 2:17). This just didn't make any sense. The verse that he quoted refers to Hymenaeus and Philetus preaching the message that the resurrection of Jesus never occurred (see [2 Timothy 2:18](#) & version=NIV" target="blank">2 Timothy 2:18 & [1 Corinthians 15:12](#) & version=NIV" target="blank">1 Corinthians 15:12). He believed that because I had begun attending a Christian church on Sunday that this practice would somehow force him to do the same. How this would happen, I do not know. Members of the WMSCOG consider Sunday worship a pagan practice. I still don't understand the connection between my attending church on Sunday, and those mentioned in the Bible that preached that Jesus had not resurrected. Just another verse that was taken out of context by him at the WMSCOG. Needless to say, the conversation was not productive because he left and refused to tell me where he would be going.

Two days later, my husband agreed to come over and talk to me again. I asked him to please come back home. He said that the only way he would move back in, would be if I agreed to attend one Sabbath service per week. Sound like coercion? I reluctantly agreed, and he moved back home. Even though I knew the teachings were wrong, and refused to take part in the prayers, I agreed to sit through the services in order to try and save my marriage. Things would be ok for a few days but it was the calm before the storm.

My husband insisted that I do all of the studies over again. I scheduled time to study with the deaconess that I had befriended during the first year of my membership. She never seemed to be available once I arrived at the church though. Unbeknownst to me, I would be studying with the pastor. My husband was present during the first study with the pastor but the study didn't go well. It seemed that the pastor would become very frustrated when I asked questions. At the end of the study I asked the pastor to tell me what the Bible says about divorce. He wouldn't answer. Instead he explained that he could not get involved in my relationship with my husband and that it was our "personal decision" if we wanted to stay together or not. Funny because I didn't ask him for his opinion on the topic, I asked him to explain what the Bible tells us about divorce. I said that I needed to understand why my husband was under the impression that it was ok to leave me. He became very frustrated and said "what difference does it make if you're both gonna die". He alluded to the belief that my husband and I should be more concerned about our salvation (which by the way can only be obtained by keeping the Sabbath, Passover, tithing, and many other requirements according to the WMSCOG) than our marriage. After that statement, the study was over. I would only study once more about two weeks later, without my husband.

The first service I attended after being gone for 6 months was quite uncomfortable. I told my husband ahead of time that I wanted to sit with him during the service. After all, I had been made to sit next to him before so I didn't think it would be a problem. I was wrong. When I got there, I told the "sister" in charge of the seating arrangement that I wished to sit with my husband. Suddenly no one knew where he was. I was suddenly allowed to sit with the "sisters" again, sandwiched in between a deaconess and a missionary. Maybe they would be the buffers between my doubts and the other "sisters". After the service I

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confronted my husband about the seating arrangement. He explained that a deacon told him that it would be best if we didn't sit together because he wouldn't be able to focus on the message being given during the service. The deacon thought that my husband would be distracted by me. Why wasn't this a concern of theirs before? This was just another inconsistency to add to the list.

About a month after I started attending the church again, my husband informs me that I am not allowed to return. He told me that the pastor "found out" that I had posted some negative information about the church online. He also mentioned a facebook page but did not offer anymore details. My husband assured me that they had shown him irrefutable evidence that I was the one that posted the negative information about the church online. I asked my husband to show me the facebook page on the computer but he said that he didn't remember how to get to the page. About two days later I called the pastor and asked him what facebook page he was referring to? The pastor stated "you come here and I'll show you". I agreed to meet with him later that afternoon.

When I arrived at the church, I would soon be joined by my husband who had lied to me about where he was before the meeting. He had arranged to attend this meeting without my knowledge. I would sit down with the pastor, a deacon and my husband to discuss the matter at hand. To my surprise I was greeted with a two page non-disclosure agreement. The deacon explained "we prepared this to protect you and to protect us... mentioning that we won't say anything about you in the same way that you won't say anything bad about us". I thought to myself, why do I need protection? I hadn't done anything wrong.

He went on to explain that in the past people have visited their church and then "lied very bad" about them on the internet. I requested that they show me the "evidence" that my husband claimed they had. My request was denied. The deacon stated, "we don't make anything on you having problems with Mark... is it ok if I read things in front of Mark?" I declined which of course made my husband upset, but he was advised by the pastor to leave the room. Here are the comments that the deacon read to me from some papers he had in front of him:

"My husband is so brainwashed by these people. It's ridiculous. I am now having these arguments with him. All he ever answers to any of my points is if not this church then where? Basically because no other church celebrates the Sabbath on Saturday and Passover. He openly admits that he can not interpret anything in the Bible without the Church of God teachings. I can't stand it. So when I read verses in the Bible that are clearly understood by anyone who reads them, he says you are applying your own mind".

"As far as the calendar goes and how they calculate the dates of the feasts, as per one of the deacons after one of the services a few weeks ago, only the general pastor in Korea knows the formula. Apparently it is secret information that no one but the general pastor is allowed to know. If you ask, they will tell you that the Jews miscalculate all the dates citing the example of when they start to celebrate the Sabbath. The Jews, from what I understand, start the Sabbath on Friday evening. According to the Church of God this is wrong, therefore all of their dates are wrong. Go figure".

I asked the deacon to explain what parts of the comments that he read in his opinion, were lies? He said "the part about him being brainwashed". He explained that everyone is entitled to their opinion, but their opinion may be a lie. They refused to tell me what website these comments came from. The deacon would explain that these comments had been posted on "some forums" with my personal email address. Then he proceeded to accuse me of posting links to other websites about the church on RickRoss.com. Again I asked for the pastor and the deacon to please show me where they obtained the information. The deacon then asked, "Would you like to sign this before I show you?". I declined to sign the non-disclosure agreement and again requested that I be shown proof of the accusations being made against me. The deacon then insisted that I read the agreement in front of me. The pastor explained "it's nothing it's like we protect each other". I still didn't understand why I needed protection. Why would I need protection from the World Mission Society Church of God? I read the agreement and it basically said that I could not discuss anything that I read, studied, or heard in the church with anyone except my husband. I do not recall the agreement containing any statements to guarantee that the church would not "say anything bad" about me as stated earlier by the deacon. The pastor said, "What if someone bad mouth your personal life do you like it?" Was this a threat to defame me?

The pastor explained that if I leave the church, I do not need to take any intellectual property with me. Interestingly, the WMSCOG has most of the "studies" on their official website. I have also seen their members copy and paste them into responses on various blogs. What the WMSCOG teaches isn't exactly secret is it? The pastor then said that if I left the church and "bad mouth" the church then he would "have to do something... hire a lawyer". He then mentioned how other people have accused them of "sue everybody". He also admitted to suing "several people" for "exposing everything" about the church and went on to say that if I am "not one of them then I just want to protect you but if you are one of them then you got a trouble". The pastor then stated "through this message clearly it should be you". At this point it was obvious that the pastor was threatening to sue me. The pastor and the deacon would not allow me to take a copy of the agreement that they requested I sign so that I could have it reviewed by an attorney. The deacon then said that he would send a "more revised version" to my attorney if I had my attorney contact them directly. Again the pastor issued what I considered to be another threat when he said, "if it's not about you it's ok but if it is you it's a problem". They again refused to show me any evidence of their accusations. They also claimed that they requested my IP address and email address from the forums and that the forums sent them all of the information that they requested. Again I was assured that after I signed the agreement they would be able to show me "all of the evidence no problem". Most forums, including facebook, do not just give out their contributors' email addresses and IP addresses because of a mere request. Disclosure of this type of personal information is only given out if the requestor provides a subpoena issued by a court. If the WMSCOG did in fact have my email address and IP address attached to any comments that they alleged I posted, I would have to question how they obtained this information. I have seen comments on forums and even videos on YouTube that accuse people in the WMSCOG of hacking websites. I started to wonder, was this one of those cases?

I wondered if the WMSCOG did this often. Do they monitor the information about them on the internet? If so, why? I remember the pastor saying, "we found out something that is not good for us that's why we called you and told you to come and check it out... we tried to find out who is a believer". Is monitoring internet activity how the WMSCOG tests the faith of their members? Are other churches concerned with what is written about them online? Do other churches ask their members to sign non-disclosure agreements before they get kicked out? This type of behavior sounds more like a business than a church.

During this meeting, the pastor and deacon mentioned more than once that they were not trying to cause problems between my husband and I. If that was true, why would they confront my husband with this so called "evidence" days prior to having my husband notify me? But later the pastor said that in this situation if my husband read these comments and found out that I was the one that posted these comments "how can you be together like that?" It seemed pretty obvious to me that their intention was to cause division between my husband and I. My husband had already made up his mind when they confronted him days before this meeting. He viewed my refusal to sign the non-disclosure agreement as an admission of guilt. But I explained to my husband that I was under no circumstances going to sign away my right to free speech. Why would a church want to silence one of their former members?

It would not be long before my husband would be turned completely against me...

Well, we can say that when the WMSCOG reads this article, they'll know for sure that you were the one that wrote it. It's funny, anyone can see those comments they read to you weren't lies, but opinion. Good thing you didn't sign that NDA, otherwise, you wouldn't have been able to speak out and tell the community about your experience. This story makes us sad because this type of behavior does not represent Christ, and it certainly doesn't represent any type of healthy "church" either. We totally agree with your question of "Do other churches ask their members to sign non-disclosure agreements before they get kicked out?" In our opinion, that is a red flag dear reader, that you should re-consider your involvement in the WMSCOG.

In the [fifth part](#) of our five part series, we learn of the ruin wrought to our friend's marriage by her husband's heavy involvement in the WMSCOG.

Related Posts

- [How The WMSCOG Turned My Life Upside Down Part 5 - My Marriage Destroyed - A Former Member's Story](#)
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[Former Member Testimony](#) August 2, 2011 9:40 AM

How The WMSCOG Turned My Life Upside Down Part 5 – My Marriage Destroyed – A Former Member's Story

[Translate]

In our [last segment](#) we learned how the WMSCOG tried to pressure [our correspondent from New Jersey](#) into signing a non-disclosure agreement. Now, in our fifth and final section of our [five part series](#), we learn of the ruin wrought to our correspondent's marriage by her husband's heavy involvement in the WMSCOG:

After my meeting with the WMSCOG, things between my husband and I would only get worse. My husband admitted that he had already made up his mind. There was no doubt in his mind that I had been posting "lies about the church" on the internet. My husband went as far as to accuse me of turning against God.

As the days went on, it seemed that his involvement in the WMSCOG continued to turn my husband against me. My husband became less attentive and less affectionate towards me. Our anniversary was fast approaching and my husband seemed disinterested in making plans to do something special. I suggested that we go away for a couple of days and he refused. He explained that he could not be away from the WMSCOG because "father was coming soon" and he needed to be ready when the time came. On the day of our one year anniversary, he still hadn't committed to any plans or even made any suggestions about what we would be doing together. We subsequently spent the early part of the day arguing. He finally admitted that he felt guilty spending any time with me after I posted "lies about the church" on the internet. He left and spent the rest of the day and evening at the WMSCOG. I was no longer worthy of his time.

The next day, my husband took me out to dinner and gave me a card in which he wrote that we had enough love to make it through. Just when I thought that things between us would get better, he 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. That would mean that he would spend every day in the WMSCOG until very late at night and all day Sunday being tested from 9am to 6pm in the afternoon. I thought that it was pretty convenient that he would be "chosen" for this "intense training" that would make it nearly impossible for us to see each other, not too long after I was kicked out. The goal of this training sounded unrealistic and seemed like a ploy to set members up to fail. 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?

Now going to the WMSCOG right after working and coming home after midnight was not enough. My husband would also stay up reading the WMSCOG books until almost 2 am. Then he would wake up at 5 am to pray. The WMSCOG was keeping the both of us sleep deprived. The strain on our marriage continued.

My husband had always told me that he wanted to have children and start a family. This was no longer the case after I was kicked out of the WMSCOG. He told me that he would not bring a child into this world and have the child's blood on his hands because he knew that I would not allow our child to be baptized by the WMSCOG, and thus they'd be "spiritually dead". So our plans to have a family were no longer important either.

At this point, things seemed to be hopeless. I wasn't spending any time with my husband because he was never home. When he was home, he would pretend that I didn't even exist. How could my husband of only one year, who I believed loved me very much before, have so much resentment for me only 6 months after I initially left the WMSCOG? A few weeks after our anniversary, my husband informed me that he no longer wanted to be with me. He decided that it would be best for the both of us since he felt that we would never agree about his involvement with the WMSCOG. He admitted that "the church was always the problem" and he would under no circumstances compromise the amount of time he spent at the WMSCOG in order to try and work on our marriage.

I was at my wits end. I believe that this was what the WMSCOG wanted all along. Why else would they have pushed him so hard? Why would they go on the internet and try to monitor my personal activity? Why would they want to track down my IP address? And what about the way that the WMSCOG pastor threatened me during the meeting? How could he just ignore their distasteful behavior? I tried everything to get my husband to see the contradictions to no avail. I just couldn't take the emotional abuse and neglect anymore and about a week later, I gave my husband an ultimatum. It was the cult or me. He chose the WMSCOG and moved out again that very evening.

I am completely heart-broken over the decision that my husband made to just abandon me the way that he did. He rarely even speaks to me these days. He says that it upsets him that I speak out about my experience with the WMSCOG and how it destroyed our marriage. But if I can help even one person out there to avoid the pain and suffering that I am enduring because of this destructive organization, then it is worth the embarrassment of posting my story online for everyone to read.

I love my husband very much and all I can do now is pray that he wakes up and returns home soon.

And we are all praying with you. Please comment below to let our friend know you support her in this difficult time.

Would you like to share your experience in the WMSCOG with us? [Contact us](#) to tell your story.

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Second Amended Complaint ¶¶ 49 - 52 / Page 1

The WMSCOG "Awarded by President Obama"?



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Controversial Points - September 19, 2011 2:28 PM

The WMSCOG "Awarded by President Obama"?

[Translate]



On July 7, 2011 a World Mission Society Church of God member named "STAR" made the following comment below the "Top 10 Reasons People Cease To Believe in the WMSCOG" article:

"President Obama just awarded the Church of God with a Call into Service Plaque. What is your church doing to receive such a high reward."

What Award Did The WMSCOG Receive?

According to the "awards list" section of the official WMSCOG site (click on "WHITE HOUSE WASHINGTON"), the WMSCOG received the President's Volunteer Service Award this year. The Presidential Service Awards website describes the purpose of the award as "a way to thank and honor Americans who, by their demonstrated commitment and example, inspire others to engage in volunteer service". What are the requirements for the award? How did the WMSCOG go about being recognized and receiving this award?

President's Volunteer Service Award Requirements

According to the Presidential Service Awards website any individual, family, or group can receive Presidential recognition for volunteer hours earned over a 12-month period or over the course of a lifetime at home or abroad. There are bronze, silver, gold and lifetime awards for those individuals or groups that have completed the required number of hours for each. It is important to note that lifetime awards cannot be awarded to groups, and groups that are awarded with any of the other three (bronze, silver, gold) awards must assure that the each individual in the group has contributed a minimum of 25 volunteer hours to the total. Individuals must submit their hours to a certifying organization that will review, verify hours served, order and distribute the award.

Who Can Become A Certifying Organization?

Nonprofit, community and faith-based organizations, businesses, schools and colleges, membership and trade associations, and federal, state or local government agencies can all

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admin: Interesting point. Now let's look further into why God chose to have mercy

ChildOfZion: Didn't God say that the Ninivites were going to be destroyed at a certain ti

ttr: John, Attending a church affects one's morality, and therefore the relatio

mother of the son: How is it the parents fault? I had NO problem with my son

admin: I understand that you may not agree with the opinion of the author of this

John: What is the religion? The religion is belief systems that relationship betw

truthwillsetme free: good question :)

MountainMom: Your story is so similar to that of mine with my son, and so many others th

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The WMSCOG "Awarded by President Obama"?

serve as certifying organizations. In order to become a certifying organization, the entity is required to fill out a short application that will be reviewed within 10-15 business days. Once approved, the certifying organization orders the awards and present them to the nominees.

The cost of each award varies between \$1.00-\$4.75 each. Click here for a list of award packages.

The WMSCOG Is Their Own Certifying Organization?

A representative of the Presidential Volunteer Services Award office informs us that the WMSCOG registered to be a certifying organization and that the registered agent on their account is Tara Byrne Whalen, WMSCOG missionary of the Ridgewood, New Jersey location. The World Mission Society Church of God **certified and ordered** President's Volunteer Service Awards and numerous bronze, silver, and gold pins for the following 15 WMSCOG locations:

1. Boston, MA
2. Delaware
3. Long Island, NY
4. Manhattan, NY
5. Queens, NY
6. Louisville, KY
7. Maryland
8. New Hampshire
9. Philadelphia, PA
10. Puerto Rico
11. Richmond, VA
12. Washington, DC
13. Central New Jersey
14. Bogota, NJ
15. Ridgewood, NJ

According to the representative of the Presidential Volunteer Service Award office, the WMSCOG **should not have nominated their Ridgewood, New Jersey location** for the award since the "certifying organization" would in essence be **awarding themselves**.





The WMSCOG added their award to the English site here (click on "THE WHITE HOUSE WASHINGTON") and in contrast to their English site, the WMSCOG added the award they presented to Joo Cheol Kim on their official Korean site here. Why did they choose to **omit Joo Cheol Kim's award from their English site**? Could it be because one of the requirements of the award is that the volunteer must be a U.S. Citizen?

Conclusion

What did the WMSCOG announce to its members regarding this award that would lead someone like "STAR" to walk away with the impression that President Obama had recognized the organization? I seriously doubt that President Obama is even aware of the WMSCOG's existence. Are WMSCOG members wearing the pins that the Ridgewood location ordered for them when they are out recruiting? Does the WMSCOG consider the hours that members spend recruiting as volunteering in the community?

After investigating the details of this award, "STAR", apparently my church isn't signing up to nominate itself "to receive such a prestigious award".

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World Mission Society Church of God -- Destroys Families - YouTube

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halleystevens10

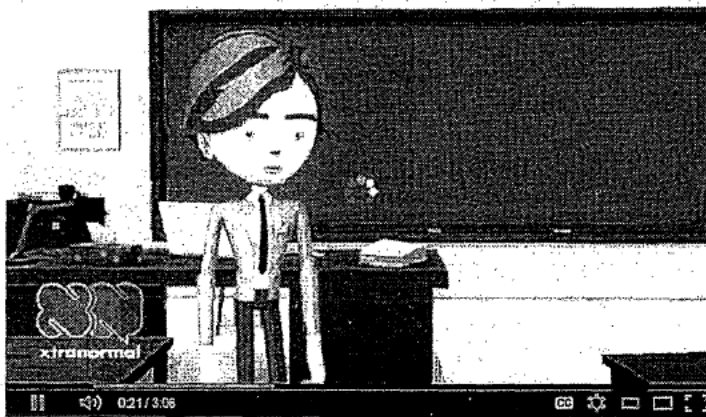
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The WMSCOG fits Robert J. Lifton's definition of a mind control cult. Go to www.examinngthewmscog.com for more info.

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you... ruthless person... jhon 6:53.. until we eat and drink flesh and blood of jesus we have no eternal life...the only way to drink and eat jesus's flesh and blood is passover mathew:28:17-28..... the members only work with their own wish.... they help... u get this... and abt the not goin anywhere but church.....??? who said dat... you guys r just making it ur self... we never use fear...!!

everything you guys saying abot fear sleep... etc.. all are lies..

who said that...you liars....

unknownwarior1 5 months ago 3

@FunDipChick It's different with the wmscog. They've already predicted the end of the world for specific years and that didn't happen. That's how you know a false prophet--read Deut 18:20-22. And it's no good to make excuses and revise predictions. Think of Harold Camping in the news recently. Add that to the wmscog's false historical 'facts,' misquoting of sources, and direct contradictions with the Bible, and it's not looking good for their integrity. They even contradict themselves!

ovangeneve 3 months ago 2

All Comments (11)

see all

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LOOK BEFORE YOU LEAVE.....!!!!!! AND REMEMBER THAT YOU WILL REGRET SO MUCH ON THE LAST DAY. IF YOU ARE CLEVER ENOUGH YOU SHOULD HAVE CONFIRM FIRST...FROM THE BIBLE...YOU PEOPLE BECAUSE YOU NEVER BELIEVE THE PROPHECIES OF THE BIBLE THATS WHY YOU HAVE CRUCIFIED JESUS CHRIST ON THE CROSS 2000 YEARS AGO BECAUSE YOU DONT BELIEVE THAT JESUS IS CHRIST....THINK ABOUT IT.

Drizute 2 weeks ago



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World Mission Society Church of God -- Destroys Families - YouTube

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Please PLEASE think twice before you make up lies and spread it to others. This is not high school. It is God's word. I PITY YOU.

V4thLoveSinead 1 month ago

wow this thing is full of lies!

ElohistJoshua 2 months ago

@evengeneve

Noah warned the people of the earth of their impending doom, was that wrong?

Jesus preached about the end of the world on a regular basis and said without true repentance, we would be thrown into the fire where there is weeping and gnashing of teeth. Was he wrong for talking about that? They simply want to help. Read Matt 24:36-51

FunDipChick 3 months ago

Plz see, God already warned us about End of world, What's so new?

Isaiah 46:10 I make known the end from the beginning, from ancient times, what is still to come. I say: My purpose will stand, and I will do all that I please.

144suzy 4 months ago

@unknownwarior1 Not lies--people I know have had the same experience as described here. Apparently you've had a different experience than most people with the wmscog? They definitely used fear when I visited. The video they showed about the coming destruction of the world by fire...that was extremely graphic. and they talked constantly about the world ending imminently, saying I should get baptized to escape the destruction (even though they knew I didn't believe!). Using fear? definitely.

evengeneve 5 months ago

DAD DEAD

NU13NU13NU13 7 months ago

Thank you so much! I was almost "ripped" from my family.

Augusthica814 7 months ago

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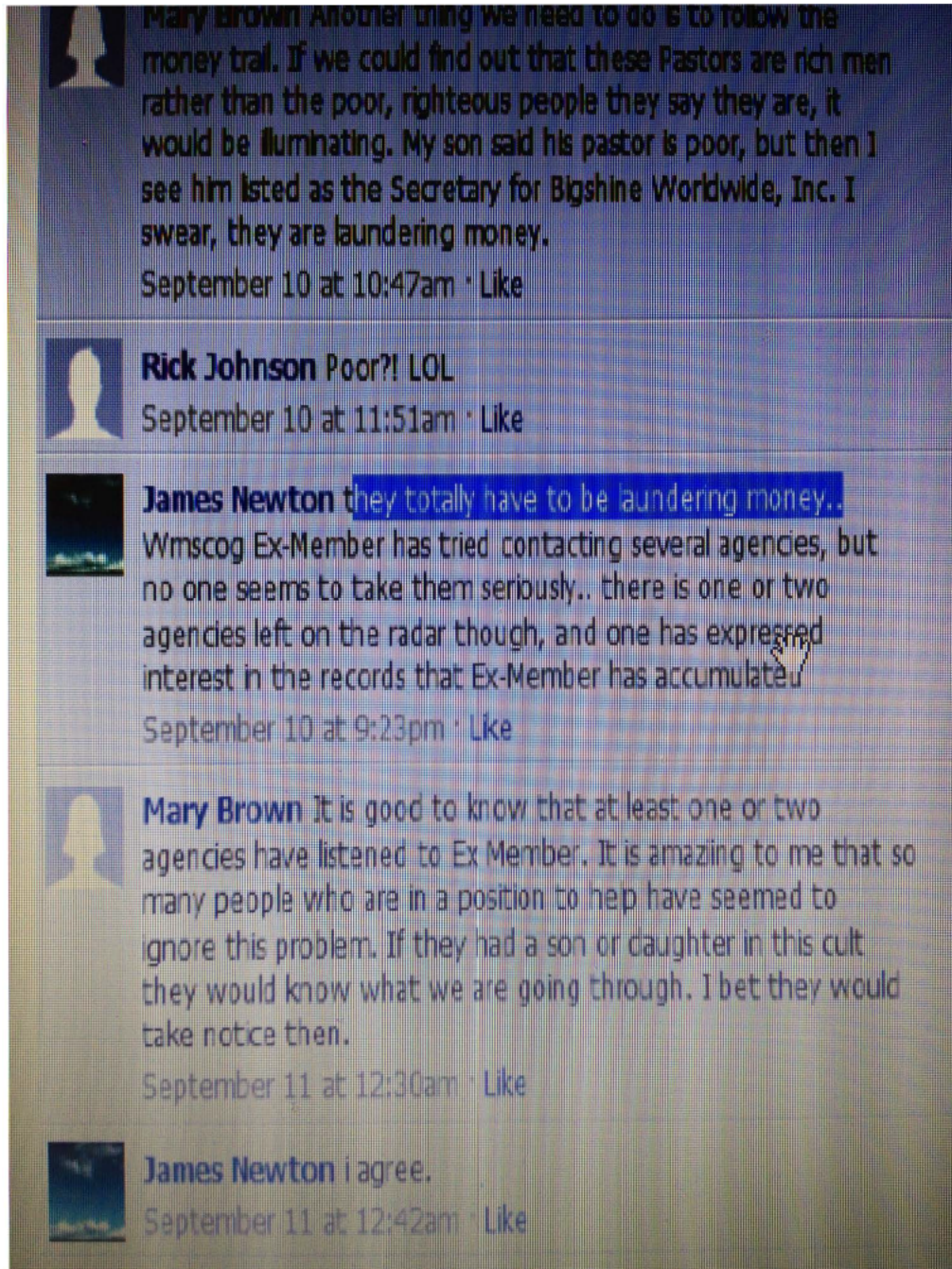
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EXHIBIT

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(see enclosed CD - You Tube Videos)