

# **EXHIBIT**

# **39**

NESENOFF & MILTENBERG, LLP  
363 Seventh Avenue, Fifth Floor  
New York, NY 10001  
Tel. 212-736-4500  
Counsel for Plaintiff

\_\_\_\_\_  
WORLD MISSION SOCIETY, )  
CHURCH OF GOD )  
 )  
Plaintiff )  
 )  
v. )  
 )  
MICHELE COLON, )  
 )  
Defendant. )  
\_\_\_\_\_ )

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L-5274-12

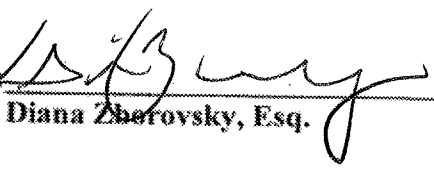
Civil Action

PLAINTIFF'S RESPONSE TO  
DEFENDANT'S FIRST REQUEST  
FOR PRODUCTION

To: Paul S. Grosswald, Esq., LLC  
Counsel for Defendant Michele Colon  
140 Prospect Avenue, Suite 8S  
Hackensack, New Jersey 07601

PLEASE TAKE NOTICE that the undersigned Plaintiff hereby provides the following  
in response to Defendant's Notice to Produce.

NESENOFF & MILTENBERG LLP  
Attorneys for Plaintiff

BY:   
Diana Zborovsky, Esq.

Dated: April 15, 2013

26. Plaintiff objects to Defendant's document requests to the extent that they seek information that is neither relevant to the issues in this litigation nor is reasonably calculated to lead to the discovery of admissible evidence.

28. Plaintiff specifically incorporates the foregoing general objections by reference, in each of its responses to Defendant's document requests.

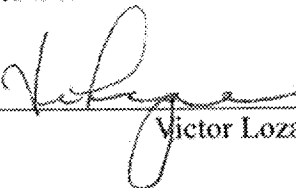
### RESPONSES

1. All documents referred to in the Complaint containing statements that are alleged to be defamatory.

RESPONSE: In addition to the General Objections, Plaintiff objects to this request because it calls for documents equally available to the Defendant, and because it calls for documents beyond those called for in the Court's February 13, 2013 Order. Subject to these Objections, Plaintiff has produced responsive documents.

### **Rule 4:18-1 Certification**

I hereby certify that I have reviewed the document production request and that I have made or caused to be made a good faith search for documents responsive to the request. I further certify that as of this date, to the best of my knowledge and information, the production is complete and accurate based on my personal knowledge. I acknowledge my continuing obligation to make a good faith effort to identify additional documents that are responsive to the request and to promptly serve a supplemental written response and production of such documents, as appropriate, as I become aware of them.

  
\_\_\_\_\_  
Victor Lozada

**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**

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

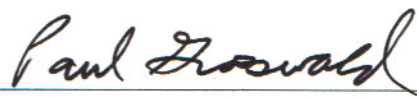
I, Paul Grosswald, of full age, hereby certify as follows:

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 Fifth Certification in support of the Defendants' Motion to Dismiss.
2. Annexed hereto as Exhibit "42" is a true and accurate copy of the unpublished opinion cited to in the accompanying brief, pursuant to R. 1:36-3:
  - Marks v. Alfa Group, 2009 U.S. Dist. LEXIS 54194 (E.D. Pa. June 25, 2009).
3. Annexed hereto as Exhibit "43" is a true and accurate copy of the April 27, 2013 document request that I served on Plaintiff World Mission, demanding a copy of the Sermon Book.

4. Annexed hereto as Exhibit "44" is a true and accurate copy of Plaintiff World Mission's May 2, 2013 response and objection to my April 27, 2013 document request for the Sermon Book.
5. Annexed hereto as Exhibit "45" is a true and accurate copy of a screenshot showing the results of a Google search with the number of hits circled in red.
6. Annexed hereto as Exhibit "46" is a true and accurate copy of pages from the Rick Ross Forum that were produced by the Plaintiffs, with highlighting added to indicate the three challenged statements from the Rick Ross Forum that are identified in the Second Amended Complaint.
7. Annexed hereto as Exhibit "47" is a true and accurate copy of the relevant pages from the transcript of the January 11, 2013 hearing held in this matter.

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: May 31, 2013

  
Paul S. Grosswald

# **EXHIBIT**

# **46**



## Cult Education Forum

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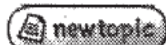
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### Ahnsahnghong

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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](http://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 Bloomington, 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)

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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 WMCOG 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."

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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 11:15PM

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)

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June 27, 2011 11:31PM

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.

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"Funeral services to escort those members of the church who have been called upon by the Lord  
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and Savior Jesus Christ to join him on high...The Pastors, Elders, and Deacons, preside in the escort ceremonies."

Funeral services?! The WMSCOG does not believe in funerals according to a Deacon that I questioned regarding this. I also heard a WMSCOG pastor say that the reason family members cry at funerals is because their spirit knows that the deceased's spirit was going to hell. That's just ridiculous. I also heard the same pastor mock those that ride limos to funerals. He said that this was like celebrating the person's death and that limos should be used for weddings and other festive celebrations. If you believe this, there is some swamp land in Florida you may be interested in.

Will a WMSCOG member respond to this and explain why the WMSCOG chose to be less than truthful on their application for tax exempt status? What does the "mother god" have to say about this?

Attachments: WMSCOG CA 4 Resize.jpg (119KB)

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July 02, 2011 01:04AM

Hailey

Date Added: 06/26/2011

Posts: 15

The World Mission Society Church of God likes to keep their locations a secret. Why? Don't they want to save everyone? Why so much secrecy?

Instead, they have body guards at the doors of each location to ensure that the "uninvited" are not allowed in. This is pretty common knowledge to those who have been members or have visited any WMSCOG location.

Google doesn't turn up much when you try to locate them. So I turned to public records. Here are some of the locations:

177 S. Bloomingdale Rd.  
Bloomingdale, Illinois

29W771 79th St.  
Naperville, Illinois

11511 Irma Drive  
Denver, Colorado

1700 Cicero Rd.  
Noblesville, Indiana

7123 N. 55th Dr.  
Glendale, Arizona

305 Godwin Ave.  
Ridgewood, New Jersey

166 Pallsade Ave.  
Bogota, New Jersey

8613 Bunker Hill Dr.  
Southaven, Missouri  
(662) 253-8320 &#8206;

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1107 N. Union Boulevard  
Colorado Springs, Colorado

9230 Prospect Ave.  
Santee, California  
San Diego

12592 Nelson St.  
Garden Grove, California

27911 E. 12th St.  
Hayward, California

52 Woodlawn Ave.  
Columbus, Ohio

230 W. 7th St.  
Deer Park, Texas

14843 NE 3rd St.  
Choctaw, Oklahoma

100 W Tyvola Rd.  
Charlotte, North Carolina

I will post any others that I find.

Options:  Reply To This Message  Quote This Message

July 02, 2011 11:37PM

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

I have decided to post the inconsistencies in the 1023 Application for tax exempt status that the World Mission Society Church of God filed for Bloomingdale Illinois in 2000. Remember that you can get a copy of the entire document by going to [www.irs.gov](http://www.irs.gov) and filling out form 4506-A.

Attached is the cover page. Note that the general pastor Joo Cheol Kim is listed as well as Hoon Jae Lee, known to WMSCOG Illinois members as pastor Jacob Lee. Note that the EIN (Employer Identification Number) is different than the EIN for California. Why would they use a different EIN if they are part of the same organization? If they have two different tax ID #'s or EINS, then they appear to be two separate organizations to the Internal Revenue Service. Is this an attempt to minimize the appearance of their growth and remain under the IRS's radar?

I will address each inconsistency separately because the jpg file is too large to attach more than one to each post.

Edited 1 time(s). Last edit at 07/02/2011 11:46PM by Hailey.  
Attachments: WMSCOG IL 1 Resize.jpg (116.7KB)

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July 03, 2011 12:39AM

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**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)

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July 03, 2011 01:53AM

**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)

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July 03, 2011 02:16AM

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

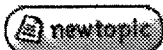
The World Mission Society Church of God tells its members that none of the pastors, missionaries, deacons, etc get paid. Then why does the WMSCOG tell the IRS that they planned to pay their pastor \$1000.00 per month starting in 2001??? That doesn't make sense. Did the WMSCOG pay their pastors before and then all of the sudden stop paying them? Wait, that doesn't make sense either. Why does the WMSCOG tell the IRS that their pastor will be paid, and then tell its member that no one gets paid?

Any WMSCOG member/official willing to explain? I won't hold my breath.

Coming soon...what does the WMSCOG tell the IRS about it's requirements for membership?  
Attachments: WMSCOG IL 3 Resize.jpg (77.9KB)

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

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## Ahnsahnghong

Goto Page: Previous 1 2 3



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)

Options:  Reply To This Message  Quote This Message

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

00082

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**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
	)	<u>Civil Action</u>
v.	)	
	)	<b>SECOND AFFIDAVIT OF</b>
MICHELE COLÓN,	)	<b>MICHELE COLÓN IN SUPPORT OF</b>
	)	<b>MOTION TO DISMISS</b>
Defendant.	)	
	)	

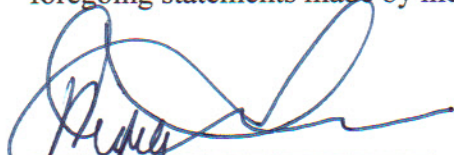
STATE OF NEW JERSEY	)	
	)	SS.:
COUNTY OF PASSAIC	)	

I, Michele Colón, being duly sworn, deposes and says:

1. I am the Defendant named in the above-captioned case. I make this second Affidavit in support of my Motion to Dismiss.
2. In ¶¶ 102-103 of the Plaintiff's Original Complaint and in ¶¶ 54-58 of the Plaintiff's Proposed First Amended Complaint, the Plaintiff refers to a video entitled, "World Mission Society Church of God – Destroys Families" (hereinafter the "Families Video").
3. I have located the Families Video online.
4. For the Court's convenience, I have transcribed the Families Video.
5. Attached hereto as Exhibit "D" is a true and accurate copy of the transcription that I made

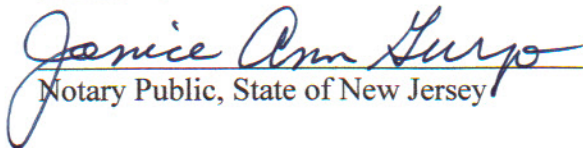
of the Families Video.

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.



Michele Colón

Sworn to before me this  
30<sup>th</sup> day of November, 2012



Janice Ann Gurzo  
Notary Public, State of New Jersey

**JANICE ANN GURZO**  
**NOTARY PUBLIC OF NEW JERSEY**  
**My Commission Expires Sept. 29, 2016**

# **EXHIBIT**

# **D**



**World Mission Society Church of God**  
**Destroys Families Video Transcript**

The World Mission Society Church of God uses mind control tactics on its members in order to tear them apart from their families. The World Mission Society Church of God uses fear and guilt as their main tactics. Members are told that if they do not observe the Passover and keep the Sabbath, they will not be saved by God and will go to hell. They believe that everyone else in the world that is not a member of the organization, including their spouse, parents, children, etc., are controlled by Satan. Members soon become afraid of everyone around them. Members are also pressured to spend all of their free time recruiting new members, studying the Bible, or putting in hours of free labor into the organization. Members are required to observe the Sabbath, on Saturday which begins at approximately 9:30 am and ends around 10 pm or later.

The World Mission Society Church of God uses fear to prevent its members from going on vacation by telling them that Christ, or Father, will return at any given moment and that they should not be found anywhere else but the church when this happens.

World Mission Society Church of God also uses sleep deprivation as a means to make their members more vulnerable to the indoctrination process. Members often do not leave the organization until 12:00 am and are encouraged to wake up at 5:00 am every morning to pray.

Members are also taught to interrupt their daily activities and work schedules to pray at approximately 10:00 am, 3:00 pm, and 8pm. They are encouraged to read books written by the World Mission Society Church of God leaders during their lunch hours at work. Every waking moment must be focused on controlling the members mind. Members have been known to lose their jobs because of their inability to get to work on time and focus on their job responsibilities while at work.

Members have been known to get kicked out of the WMSCOG because of their inability to pay the 10 percent of their income that is required for their tithe. This does not include the numerous free will offerings collected. The World Mission Society Church of God does not provide any financial statements to its members and does not disclose where and how the millions of dollars collected are spent.

Members are encouraged to get rid of anything or anyone that gets in the way of spending time in the WMSCOG.

The World Mission Society Church of God teaches heresies. The WMSCOG teaches that a dead man named Ahn Sahng Hong was the second coming of Jesus Christ and that a woman named Zhang Gil Jah is the quote Mother God. Biblical refutes are posted at [www.examiningscog.com](http://www.examiningscog.com).

Please visit [www.examiningscog.com](http://www.examiningscog.com) for more information on this destructive group.

**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
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Plaintiffs,	)	DOCKET NO. BER-L-5274-12
	)	
v.	)	<u>Civil Action</u>
	)	
MICHELE COLÓN, et al.	)	<b>FIFTH AFFIDAVIT OF</b>
	)	<b>MICHELE COLÓN</b>
Defendants.	)	<b>IN SUPPORT OF DEFENDANTS'</b>
	)	<b>MOTION TO DISMISS</b>

STATE OF NEW JERSEY    )  
   )        SS.:  
 COUNTY OF PASSAIC     )

I, Michele Colón, being duly sworn, deposes and says:

1. I am the Defendant named in the above-captioned case. I make this Fifth Affidavit in support of my Motion to Dismiss.

**Signing Contract Under Duress**

2. When I was a member of Plaintiff World Mission, I and other members were indoctrinated with a "siege mentality," which caused us to believe that we were under constant threat from Satan.

3. Plaintiff World Mission taught me that Pastor Lee was an emissary of God, and that I must obey Pastor Lee's instructions in order to serve God.
4. Plaintiff World Mission taught me that if I disobeyed Pastor Lee's instructions then I would lose my Salvation and would be condemned to Hell.
5. Plaintiff World Mission also taught me that if I disobeyed Pastor Lee's instructions, I would be kicked out of the church and would lose contact with my husband, Mark Ortiz ("Mr. Ortiz"), as members are forbidden from contact with former members.
6. The contract annexed to the Second Amended Complaint is dated September 4, 2010 (the "September 4 NDA").
7. That was one day before my wedding ceremony to Mr. Ortiz.
8. Pastor Lee was supposed to officiate the ceremony, and another church member was in charge of the flower arrangements.
9. I feared that if I refused to sign the September 4 NDA, Pastor Lee might retaliate against me by refusing to officiate, or by instructing the other church member not to provide the flowers.
10. When I signed the September 4 NDA, I was in a room full of other church members who had all been indoctrinated with a siege mentality, just like me.
11. All of those church members would have viewed me with suspicion if I had balked at Pastor Lee's demand to sign the September 4 NDA.
12. Between September 4, 2010 and April 22, 2011, I obtained additional information about the WMSCOG which unraveled my indoctrination and gave me the confidence to stand up for myself.

13. After I stood up for myself and refused to sign the new non-disclosure agreement on April 22, 2011, I was kicked out of Plaintiff World Mission.
14. After that, Plaintiff World Mission began to cut me off from Mr. Ortiz.

**Financial Info Video**

15. Annexed hereto as Exhibit G is a true and accurate copy of a transcript that I made of the Financial Info Video, contained in Exhibit 38 of the Fourth Grosswald Certification submitted in support of this motion. I added highlighting to the transcript to show where each of the challenged statements described in the Second Amended Complaint begins and ends. I also added paragraph indicators to show which paragraph in the Second Amended Complaint each challenged statement corresponds to. Finally, I corrected a typo that was contained in the previous version of this transcript that I submitted as Exhibit C to my First Affidavit in support of my original motion to dismiss.

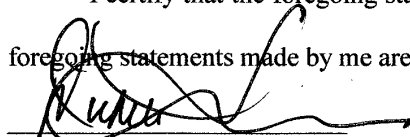
**Plaintiff World Mission Members' Internet Access**

16. As part of the siege mentality described above, Plaintiff World Mission taught me and the other members that the Internet is controlled by Satan and that members could suffer spiritual harm if they read about the WMSCOG on the Internet.
17. I was taught by Plaintiff World Mission that members of Plaintiff World Mission are forbidden from reading about the church on Internet sites that were critical of the organization.


**Mr. Ortiz's Mother**

18. Mr. Ortiz's mother's name is Ursula Hernandez, not "Mrs. Ortiz."

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.

  
Michele Colón

Sworn to before me this 30<sup>th</sup> day of May, 2013

  
Notary Public, State of New Jersey

**JANICE ANN GURZO**  
**NOTARY PUBLIC OF NEW JERSEY**  
**My Commission Expires Sept. 29, 2016**

# EXHIBIT

# G

## World Mission Society Church of God Public Financial Info SAC Paragraphs 59-64

## Video Transcript

The World Mission Society Church of God requires its members to donate ten percent of their income to the organization as their tithe, in addition to other free will offerings. The World Mission Society Church of God **does not provide any form of financial disclosure to its members. So where does the money go?**

¶ 60

In two thousand and eight, the World Mission Society Church of God in Bloomingdale, Illinois filed a tax return. The tax return that a non profit organization files is called an IRS form 990. Go to [www.IRS.gov](http://www.IRS.gov) for more info on the tax form 990.

You can download and view the IRS form 990 that the World Mission Society Church of God in Bloomingdale, Illinois at [www.guidestar.org](http://www.guidestar.org). You will be asked to register for a free account. Download your own copy of the tax return filed by the WMSCOG and follow along with us. You may want to have a pen and paper ready.

Ok let's begin. First note that on page 1 of the 990, Jay Hoon Lee is listed as the principal officer. We will refer to this name again later. Jacob Lee is listed as the director, and to members is known as the pastor for the Bloomingdale, Illinois location. Are Jay Hoon Lee and Jacob Lee the same person?

Turn to page 4. Note line 28 A. The WMSCOG denies that **the organization has a direct business relationship through ownership in another entity.** This is where it gets interesting folks

¶ 60

The members of the Ridgewood, New Jersey location know their pastor as Daniel Lee. His real Korean, name is Dong Il Lee, and he is listed as the registered agent for the WMSCOG location in Ridgewood, New Jersey. If you would like to confirm that pastor Dong Il Lee is listed as the registered agent for the World Mission Society Church of God in Ridgewood, New Jersey, you may visit the New Jersey Department of Treasury website and order a copy of the business entity certificate. The cost is 5 dollars through the New Jersey business gateway, and you will be able to view the certificate immediately online. The filing number is 0400232791.

It is interesting to note that Dong Il Lee, the pastor from the Ridgewood, New Jersey location, owns a business called Big Shine Worldwide Incorporated. The website to his business is [www.bigshine.com/worldwide](http://www.bigshine.com/worldwide). You may confirm that pastor Dong Il Lee is listed as the president of Big Shine Worldwide by visiting the New Jersey Department of the Treasury website and ordering a business status certificate. You may view the certificate immediately online through the New Jersey business gateway. The business filing ID number is 0100836956.

Now in order to see the connection between Big Shine Worldwide and the World Mission Society Church of God, you will need to visit the Illinois Secretary of State website at

www.cyberdriveillinois.com. This website is free. Then search the corporate business certificates of good standing. Type in World Mission Society Church of God, in the search box. The file number is 61057056. Then search for the certificate of good standing for Big Shine Worldwide. The file number is 61109528.

According to the business certificate for Big Shine Worldwide in Illinois, Pastor Dong Il Lee of Ridgewood, New Jersey is listed as the director and, Jay Hoon Lee of Bloomingdale, Illinois is listed as the secretary of Big Shine Worldwide. Here is a **clear business relationship!**

¶ 60

The same relationship between Pastor Dong Il Lee and Jay Hoon Lee can be seen on the business certificate for Big Shine Chicago, which is another leg of Big Shine Worldwide Incorporated. Also note that the address for Jay Hoon Lee on the Big Shine Worldwide certificate is the same address listed for the World Mission Society Church of God location in Bloomingdale, Illinois. Please refer to page 1 of the tax form 990 to confirm this address.

Now please turn to page 6 of the tax form 990. Note line 9 A. The World Mission Society Church of God denies that they have any chapters, branches, or affiliates. The World Mission Society Church of God has over 20 in the United States alone. You may confirm this by visiting the WMSCOG official USA, website at [http://usa.watv.org/welcome/history\\_usa.html](http://usa.watv.org/welcome/history_usa.html).

Now turn to form 990 page 7. The WMSCOG claims not to pay anyone or have any employees. That includes their pastors. How do the pastors make a living? How do they pay for their basic expenses? Are they all independently wealthy? Well one can assume that Jay Hoon Lee, as secretary of Big Shine Worldwide in Chicago, is getting a paycheck from Ridgewood New Jersey WMSCOG Pastor, and owner of Big Shine Worldwide, Dong Il Lee.

Now turn to page 9. Note on line 2 B. The WMSCOG claimed not to have chapters, branches, or affiliates on page 6, yet here they claim that they received **a little over \$26,000 from a quote parental church.**

¶ 62

Also on Page 9 Line 2 A. They claim to have received almost \$800,000. Where did all of this money go?

Turn to Page 10 and Note Line 24 A. The WMSCOG claims to have spent over **\$300,000 on missionary expenses.** If the members are assigned to pay for, and cook the food served to the members at the church, and the members pay for their own plane tickets to Korea, then what was this money used for? Members also pay for travel expenses when they go on short term preaching missions. Again, where is this money going?

¶ 64

Turn now to Page 16. Note Section A Part 1. It shows that the WMSCOG was growing exponentially, and over the course of 5 years, accumulated over 2 million dollars in donations, gifts, grants, etc. Again, do the members know how this money was spent?



Does the WMSCOG print this information for its members? Is there an annual report available to its members?

The discovery that Big shine Worldwide has such close connections to the World Mission Society Church of God is quite suspect. You may want to compare the locations that Big Shine does business in, and compare them to the locations where the World Mission Society Church of God operates. You will be surprised to see the amount of overlap not just in the US but overseas as well. More information on the WMSCOG's questionable business connections and tax filings to come.

¶ 60

¶ 64

**NESENOFF & MILTENBERG, LLP**  
**363 Seventh Avenue, Fifth Floor**  
**New York, NY 10001**  
**Tel. 212-736-4500**  
**Counsel for Plaintiffs**

**WORLD MISSION SOCIETY,** )  
**CHURCH OF GOD and MARK** )  
**ORTIZ,** )  
) )  
**Plaintiffs,** )  
) )  
**v.** )  
) )  
**MICHELE COLON and TYLER** )  
**NEWTON,** )  
) )  
**Defendants.** )  
) )

**SUPERIOR COURT OF NEW JERSEY**  
**LAW DIVISION: BERGEN COUNTY**

**DOCKET NO. BER-L-5274-12**

**Civil Action**

**CERTIFICATION OF**  
**DIANA R. ZBOROVSKY IN**  
**OPPOSITION TO DEFENDANTS'**  
**MOTION TO DISMISS,**  
**STRIKE AND DISQUALIFY**

I, Diana Zborovsky, of full age, hereby certify as follows;

1. I am an attorney at law of the State of New Jersey, with the firm of Nesenoff & Miltenberg, LLP, counsel for the Plaintiffs in the above-captioned matter. As such, I am fully familiar with the facts contained herein. I submit this Certification in opposition to Defendants' Motions to dismiss and for Sanctions, and in support of Plaintiffs' motion for an order directing the clerk to file the Second Amended Complaint.

2. Annexed hereto as Exhibit "1" is a true and accurate copy of the Second Amended Complaint in this action.

3. Annexed hereto as Exhibit "2" is a true and accurate copy of the Order granting Defendant Colon's Motion to Dismiss on the basis of a lack of personal jurisdiction in Virginia.

4. Annexed hereto as Exhibit "3" is a true and accurate copy of Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Dismiss dated November 19, 2012.

5. Annexed hereto as Exhibit "4" is a true and accurate copy of the Complaint in Colon v. World Mission Society of God, dated April 19, 2013.

6. Annexed hereto as Exhibit "5" is a true and accurate copy of Defendant's Memorandum of Law in Reply to Defendant's Motion to Dismiss dated December 3, 2012.

7. Annexed hereto as Exhibit "6" is a true and accurate copy of Plaintiff's Letter Brief dated December 14, 2012.

8. Annexed hereto as Exhibit "7" are true and accurate copies of relevant portions of the Transcript of the teleconference held on February 13, 2013.

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: May 21, 2013**

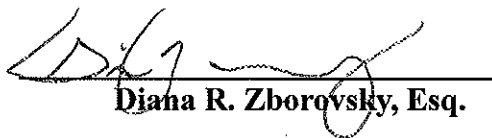
  
Diana R. Zborovsky, Esq.

Exhibit 2

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

WORLD MISSION SOCIETY CHURCH  
OF GOD, A NEW JERSEY NON-PROFIT  
CORPORATION,

Plaintiff,

v.

MICHELE COLON and  
TYLER J. NEWTON

Defendants.

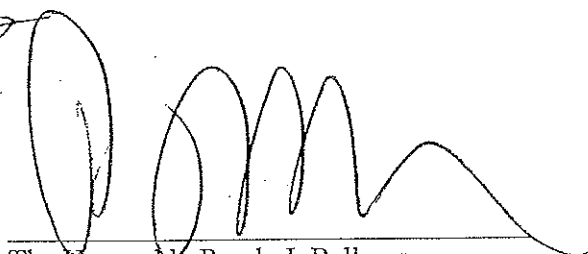
Case No. 2011-17163

ORDER GRANTING DEFENDANT COLON'S MOTION TO DISMISS

This cause comes before the Court upon Defendant Michele Colon's Motion to Dismiss for Lack of Personal Jurisdiction. It appearing to the Court that Defendant Colon lacks minimum contacts with the Commonwealth of Virginia, and for the reasons stated in open court, it is hereby

ORDERED that the Motion to Dismiss is GRANTED and Defendant Michele Colon is hereby dismissed from this action, ~~with prejudice.~~

ENTERED this 16<sup>th</sup> day of March, 2012.



The Honorable Randy I. Bellows