

**PAUL S. GROSSWALD**  
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Attorney for Defendant,  
**Michele Colón**

WORLD MISSION SOCIETY  
CHURCH OF GOD,

Plaintiff,

- against -

MICHELE COLÓN,

Defendant.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L-5274-12

Civil Action

**CERTIFICATION OF PAUL S.  
GROSSWALD IN OPPOSITION TO  
PLAINTIFF'S MOTION FOR A  
PROTECTIVE ORDER**

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 Certification in opposition to Plaintiff's motion for a protective order.
2. Annexed hereto as Exhibit "1" is a true and accurate copy of Page 21 of the transcript of the January 11, 2013 hearing held in this matter.
3. Every fact contained in ¶ 31 of Solomon Rubin's certification in support of Plaintiff's motion for a protective order is false.
4. I have never met Solomon Rubin.
5. I have never had any communication or other interaction with Solomon Rubin other than that he has been copied on some of Mr. Miltenberg's emails related to this litigation. The first such email was in late September 2013.

6. I have never posted any of the documents pertaining to this litigation online.
7. Annexed hereto as Exhibit "2" is a true and accurate copy of the Presidential Volunteer Service Award Article which is described in ¶¶ 49-52 of the Plaintiff's Second Amended Complaint, and which was produced by Plaintiff in response to this Court's February 13, 2013 production order.
8. On October 9, 2013, Plaintiff served me with papers pertaining to the instant motion. Those papers did not include a copy of Guthrey v. Cal. Dep't of Corr. & Rehab., 2012 U.S. Dist. LEXIS 89174 (E.D. Cal. June 27, 2012), which is the unpublished case referenced in ¶ 80 of Solomon Rubin's Certification.

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: October 16, 2013

  
Paul S. Grosswald

# **EXHIBIT**

**1**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, CIVIL PART  
BERGEN COUNTY  
DOCKET NO. BER-L-5274-12  
A.D.# \_\_\_\_\_

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WORLD MISSION SOCIETY CHURCH )  
OF GOD, )  
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Plaintiff, )  
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vs. )  
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COLON, )  
 )  
Defendant. )

TRANSCRIPT  
OF  
MOTION

Place: Justice Center  
10 Main St.  
Hackensack, NJ 07601

Date: January 11, 2013

BEFORE:

HONORABLE RACHELLE L. HARZ, J.S.C.

TRANSCRIPT ORDERED BY:

ALLISON A. DUGGAN, Paralegal (Nesenoff & Miltenberg, LLP)

APPEARANCES:

MARCO A. SANTORI, ESQ. (Nesenoff & Miltenberg, LLP)  
DIANA ZBOROVSKY, ESQ. (Nesenoff & Miltenberg, LLP)  
Attorneys for the Plaintiff

PAUL S. GROSSWALD, ESQ.  
Attorney for the Defendant

Transcriber, Deborah A. Mastrantonio  
G & L TRANSCRIPTION OF N.J.  
40 Evans Place  
Pompton Plains, New Jersey 07444

Audio Recorded  
Recording Operator, \_\_\_\_\_

1 forward at this point looking at the allegations put forth  
2 in the pleading, it doesn't mean you make it to the jury.

3 MR. SANTORI: At least to discovery Your Honor.

4 MR. GROSSWALD: But Your Honor I just want to  
5 point out that as a matter of law I think it's highly  
6 inappropriate for this court to say that as a -- that you  
7 can have an emotional distress claim arising out of a  
8 family member trying to do an intervention for another  
9 family member. Because if that's the precedent that this  
10 court establishes, what does that do to every family who  
11 has a kid on drugs where they bring the kid to a drug  
12 counselor, and the kid says well, I don't have a drug  
13 problem your causing me emotion distress, now I have a  
14 tort that I can sue you for. Right. Any -- any person  
15 who tries to do a suicide intervention for a family member  
16 is going to be accused of inflicting emotional distress,  
17 because the person doesn't want the help.

18 I mean -- I mean it -- emotional distress the  
19 tort is supposed to be for extreme and outrageous  
20 behavior. This court should not say that it is extreme  
21 and outrageous for a family member to try to do an  
22 intervention for another family member in a crisis,  
23 because that would just be devastating for families who  
24 are trying to get help for loved ones. There has to be  
25 something extreme and outrageous.

# **EXHIBIT**

**2**

The WMSCOG "Awarded by President Obama"



# Examining The World Mission Society Church Of God

HOME FIRST STEPS WHO IS AHNSAHNGHONG? WHO IS ZHANG GIL-JAH? EVIDENCE MIND CONTROL

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## 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

### Site Map

- "Mother God"
- "Problems With New Jerusalem, The Bride, and Women's Veils" by Ahnsahng Hong
- Ahnsahng Hong vs. Scripture
- Ahnsahng Hong vs. WMSCOG
- Angels Before?
- Are They A Cult?
- Biblical Misinterpretations
- Controversial Points
- Did Constantine Abolish The Sabbath?
- Historical Revisionism & Contextomy
- Mind Control
- The Bride
- The Heifer
- Top 10 Reasons People Leave
- WMSCOG Literature

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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".

### Popular Posts

- Ahnsanghong Predicts Christ's Return in 1988  16
- "It's not the devil... It's my baby" - A Former Member's Story  16
- 2012 Pamphlet?  7
- Ahnsanghong Never Claimed to be God  5
- How The WMSCOG Turned My Life Upside Down Part 2 - The Creeping Time Commitment - A Former Member's Story  5
- "Your Son Is A Man, You Have No Right To Take Him To The Doctor" - A Family Member's Story  5

### Video Category

#### 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

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