

Superior Court of New Jersey
Appellate Division
Docket No.

WORLD MISSION SOCIETY CHURCH)
OF GOD)
Plaintiff-Respondent)
v.)
MICHELE COLÓN)
Defendant-Appellant)

Civil Action

On request for leave to
appeal the orders denying
Defendant's motion to dismiss
for failure to state a claim
and motion for reconsideration
entered in the Superior Court
of New Jersey, Bergen County
Docket No. BER-L-5274-12

Sat below: Honorable Rachelle
L. Harz, J.S.C.

**Appendix of Defendant-Appellant
Michele Colón**

Volume 2 of 2

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Michele Colón

MICHELE COLÓN, a New Jersey resident;

Plaintiff,

- against -

WORLD MISSION SOCIETY, CHURCH OF GOD, a NJ Nonprofit Corporation; WORLD MISSION SOCIETY CHURCH OF GOD, a South Korean corporation; GIL JAH CHANG, a.k.a. Gil Jah Zhang, a South Korean resident; JOO CHEOL KIM, a South Korean resident; DONG IL LEE, a.k.a. Daniel Lee, a New Jersey resident; BONG HEE LEE a.k.a. Bong Hee Kim, a New Jersey resident; TARA WHALEN, a.k.a. Tara Byrne, a New Jersey resident, RICHARD WHALEN, a New Jersey resident, VICTOR LOZADA, a New Jersey resident, JUN SEOK LEE, a.k.a. John Lee, a New Jersey resident, BIG SHINE WORLDWIDE, INC., a New Jersey corporation; ALBRIGHT ELECTRIC LLC, a New Jersey limited liability company; and LINCOLN GRILL & CAFÉ LIMITED LIABILITY COMPANY, a New Jersey limited liability company;

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L-3007 - 13

Civil Action

COMPLAINT

JURY DEMAND

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

INTRODUCTION

1. The Defendants in this case are members of or corporations related to the World Mission Society Church of God, which purports to be a non-profit charitable church, but is actually a profit-making global criminal enterprise (the "World Mission Enterprise" or "World Mission").
2. World Mission recruited the Plaintiff to become a member of the global criminal enterprise without her knowledge or informed consent.
3. World Mission fraudulently extracted donations of money, time, and energy from the Plaintiff under the pretense that such donations were being made for nonprofit, charitable, or tax-exempt purposes, when in fact such donations were used for profit-driven, non-charitable, non-tax exempt purposes.
4. When the Plaintiff caught on to the scheme and began complaining, World Mission retaliated against the Plaintiff by hacking into her Internet accounts.
5. World Mission also retaliated against the Plaintiff by showing the Plaintiff's picture to members of World Mission and telling the members that they should no longer have any communication with the Plaintiff.
6. The Plaintiff is seeking damages for fraud, intentional infliction of emotional distress, invasion of privacy, and related causes of action.

PARTIES

Plaintiff

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

Corporate Defendants

8. Defendant World Mission Society Church of God, a NJ Nonprofit Corporation ("World Mission New Jersey") is a nonprofit corporation with its registered office and principal

place of business at 305 Godwin Avenue, Ridgewood, New Jersey, 07450-3604. Pursuant to Rule 4:3-2(b), World Mission New Jersey is deemed to reside in Bergen County.

9. Defendant World Mission Society Church of God, a South Korean corporation ("World Mission South Korea") is a corporation with its principal place of business in South Korea.
10. Defendant Big Shine Worldwide, Inc. ("Big Shine") is a corporation which sells electronic goods and services, with its principal place of business in New Jersey.
11. Defendant Albright Electric, LLC ("Albright") is a corporation which provides contractors to perform electrical work, with its principal place of business in New Jersey.
12. Lincoln Grill & Café Limited Liability Company ("Lincoln Grill") is a corporation which operates a restaurant, with its principal place of business in New Jersey.

Natural Person Defendants

13. Defendant Gil Jah Chang, a.k.a. "Gil Jah Zhang" ("Chang") is the leader of World Mission South Korea and a resident of South Korea.
14. Defendant Joo Cheol Kim ("Kim") is the General Pastor for World Mission South Korea, a trustee for World Mission New Jersey, and a resident of South Korea.
15. Defendant Dong Il Lee, a.k.a. "Daniel Lee" ("Dong Lee") is the Pastor of World Mission New Jersey, a trustee of World Mission New Jersey, the husband of Defendant Bong Lee, and a resident of New Jersey. Dong Lee is an owner, either formally or informally, of Big Shine, Albright, and Lincoln Grill.
16. Defendant Bong Hee Lee, a.k.a. "Bong Hee Kim" ("Bong Lee") is the secretary for World Mission New Jersey, the accountant for World Mission New Jersey, a trustee of

- World Mission New Jersey, the wife of Dong Lee, and a resident of New Jersey. Bong Lee is an owner, either formally or informally, of Big Shine and Lincoln Grill.
17. Defendant Tara Whalen, a.k.a. "Tara Byrne" ("Tara Whalen") is a Missionary for World Mission New Jersey, the wife of Defendant Richard Whalen, and a resident of New Jersey. Tara Whalen is an owner, either formally or informally, of Albright.
 18. Defendant Richard Whalen ("Richard Whalen") is a Missionary for World Mission New Jersey, the husband of Defendant Tara Whalen, and a resident of New Jersey. Richard Whalen is an owner, either formally or informally, of Albright.
 19. Defendant Victor Lozada ("Lozada") is a Missionary for World Mission New Jersey, and a resident of New Jersey.
 20. Defendant Jun Seok Lee, a.k.a. "John Lee" ("Jun Lee") is a Deacon for World Mission New Jersey, and a resident of New Jersey. Jun Lee is an owner, either formally or informally, of Big Shine.
 21. Chang and Kim work together as the two leaders of the entire World Mission Enterprise.
 22. Chang and Kim are not accountable to anyone within the World Mission Enterprise other than themselves.
 23. Chang and Kim hold positions of authority and responsibility within World Mission South Korea, and are each responsible for setting forth and enforcing the policies and procedures of World Mission South Korea which gave rise to the torts alleged herein.
 24. The Pastor holds the highest position in World Mission New Jersey.
 25. The Missionaries hold the second-highest positions in World Mission New Jersey.
 26. The Deacons hold the third-highest positions in World Mission New Jersey.

27. Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee each hold positions of authority and responsibility within World Mission New Jersey, and are each responsible for setting forth and enforcing the policies and procedures of World Mission New Jersey which gave rise to the torts alleged herein.
28. Notwithstanding the positions of authority and responsibility held by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, World Mission New Jersey is actually under the control and domination of World Mission South Korea, Chang, and Kim.

JURISDICTION AND VENUE

Subject Matter Jurisdiction

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

Venue

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

Personal jurisdiction / Corporate Defendants

31. This Court has personal jurisdiction over World Mission New Jersey because World Mission New Jersey has its principal place of business in New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.

32. This Court has personal jurisdiction over World Mission South Korea because World Mission South Korea directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, and is the alter ego of World Mission New Jersey, which has its principal place of business in New Jersey.
33. This Court has personal jurisdiction over Defendant Big Shine because Big Shine has its principal place of business in New Jersey, and is the alter ego of World Mission New Jersey, Dong Lee, Bong Lee, and Jun Lee, all of whom reside or have their principal place of business in New Jersey.
34. This Court has personal jurisdiction over Albright because Albright has its principal place of business in New Jersey, and is the alter ego of World Mission New Jersey, Dong Lee, Tara Whalen, and Richard Whalen, all of whom reside or have their principal place of business in New Jersey.
35. This Court has personal jurisdiction over Lincoln Grill because it has its principal place of business in New Jersey, and is the alter ego of World Mission New Jersey, Dong Lee, and Bong Lee, all of whom reside or have their principal place of business in New Jersey.

Personal jurisdiction / Natural Person Defendants

36. This Court has personal jurisdiction over Chang because she directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, and is the alter ego of World Mission New Jersey, which has its principal place of business in New Jersey.
37. This Court has personal jurisdiction over Kim because he directed tortious conduct into New Jersey, caused the Plaintiff's injuries within New Jersey, and is both a trustee of and the alter ego of World Mission New Jersey, which has its principal place of business in New Jersey.

38. This Court has personal jurisdiction over Dong Lee because he is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.
39. This Court has personal jurisdiction over Bong Lee because she is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.
40. This Court has personal jurisdiction over Tara Whalen because she is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.
41. This Court has personal jurisdiction over Richard Whalen because he is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.
42. This Court has personal jurisdiction over Lozada because he is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.
43. This Court has personal jurisdiction over Jun Lee because he is a resident of New Jersey, committed the tortious conduct alleged herein primarily in New Jersey, and caused the Plaintiff's injuries within New Jersey.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

I. BACKGROUND FACTS REGARDING THE WORLD MISSION ENTERPRISE

A. The World Mission Enterprise

44. The World Mission Enterprise began as a single church established in South Korea in 1964 by Ahn Sahng Hong.

45. Ahn Sahng Hong died in 1985.
46. The World Mission Enterprise was subsequently taken over by Chang, Ahn Sahng Hong's "spiritual" wife, who refers to herself as "God the Mother."
47. In 1985, Kim was appointed as the General Pastor for the global World Mission church.
48. Since around that time, Chang and Kim have run the World Mission Enterprise together.
49. Chang and Kim control and operate the entire World Mission Enterprise through World Mission South Korea.
50. World Mission South Korea is the global headquarters for the World Mission Enterprise.
51. The World Mission Enterprise consists of a global network of approximately 1400 local World Mission entities spread around the world.
52. One of those local entities is World Mission New Jersey.
53. World Mission South Korea seeks to create the appearance that World Mission New Jersey is independent of World Mission South Korea.
54. To create such an appearance, World Mission New Jersey has incorporated to give itself a separate corporate identity.
55. Nevertheless, World Mission New Jersey is operated and controlled by World Mission South Korea.
56. World Mission New Jersey has no ability to operate independently of World Mission South Korea.
57. Dong Lee was made the Pastor of World Mission New Jersey by World Mission South Korea.

58. If Dong Lee attempted to operate World Mission New Jersey independently of World Mission South Korea, he would be removed from his post by World Mission South Korea.
 59. World Mission South Korea regularly sends instructions to World Mission New Jersey.
 60. World Mission New Jersey regularly sends its attendance and donation records to World Mission South Korea.
 61. With limited exception, World Mission South Korea approves all official literature, policies and practices used and employed by World Mission New Jersey.
 62. On information and belief, almost all of the money raised by World Mission New Jersey is forwarded to World Mission South Korea.
 63. World Mission New Jersey is the alter ego of World Mission South Korea.
 64. World Mission South Korea is the alter ego of World Mission New Jersey.
 65. World Mission New Jersey is also the alter ego of several profit-making companies, including Big Shine, Albright, Lincoln Grill, and others to be identified during the course of this litigation (the "Profit-Making Companies").
 66. Each of the Profit-Making Companies is the alter ego of World Mission New Jersey.
 67. In fact, Big Shine and Albright share the same office space in Glen Rock, New Jersey.
- B. Status of the World Mission Enterprise, and Its Constituents, as a "Religion"**
68. World Mission South Korea claims to be a "church."
 69. World Mission New Jersey claims to be a "church."
 70. Defendants try to avoid being held accountable for their actions by portraying their secular crimes and torts as "religious" so that they can take advantage of laws that give special protections to religions.

71. World Mission New Jersey has obtained religious tax exemption from the IRS.
72. World Mission New Jersey obtained its religious tax exemption from the IRS by fraudulent means.
73. World Mission New Jersey made a number of material false representations in its application for tax exemption to the IRS.
74. For instance, World Mission New Jersey failed to disclose to the IRS that it has a close connection with World Mission South Korea, as it was required to disclose on its application for tax exemption.
75. World Mission New Jersey also failed to disclose to the IRS that it sends money to World Mission South Korea, as it was required to disclose on its application for tax exemption.
76. On information and belief, World Mission New Jersey has used its tax exemption fraudulently by using its tax exemption number to purchase inventory and supplies for the Profit-Making Companies.
77. On information and belief, the Profit-Making Companies then funnel the profits back into World Mission New Jersey, to avoid taxation.
78. Therefore, World Mission New Jersey is not entitled to maintain its religious tax exemption, and is not entitled to use its current tax-exempt status as evidence of its religious nature. Moreover, the Defendants are not entitled to raise any defense that is based on "religious freedom," the "free exercise of religion," or the status of World Mission South Korea or World Mission New Jersey as a "religion" or "church."
79. Even if World Mission South Korea or World Mission New Jersey are deemed to be a "religion" or a "church," the conduct alleged herein does not constitute religious

expression, in that the goal of the Defendants' conduct was not to advance their religion, but rather to advance the criminal enterprise and to defraud and injure the Plaintiff.

80. Even if the conduct alleged herein constitutes religious expression, the Defendants may be held liable because their conduct tends to inflict serious, life-threatening harm on their victims.

81. Victims of the Defendants often become suicidal, depressed, anxious, psychotic, or alienated from their families as a result of the Defendants' conduct.

82. Therefore, the State of New Jersey has a compelling interest in stopping such conduct by allowing the Plaintiff to hold the Defendants liable.

83. Allowing the Plaintiff to hold the Defendants liable is the least restrictive means for the State of New Jersey to satisfy its compelling interest.

C. Criminal Nature of the World Mission Enterprise

84. Despite the pretense that World Mission South Korea and World Mission New Jersey are "churches" which exist for non-profit purposes, World Mission New Jersey is actually part of a criminal business enterprise which is run for a profit.

85. World Mission New Jersey purportedly subsists off of the donations of its members.

86. However, in addition to collecting donations from its members, World Mission New Jersey also dominates and controls the Profit-Making Companies.

87. On information and belief, World Mission New Jersey has used its nonprofit tax exemption number to purchase supplies and inventory for the Profit-Making Companies.

88. World Mission New Jersey staffs the Profit-Making Companies exclusively with its own members.

89. The World Mission New Jersey members who staff the Profit-Making Companies are abused and exploited, and subjected into a state of de facto slavery.
90. The Profit-Making Companies frequently pay their employees less than a living wage.
91. The Profit-Making Companies frequently pay their employees off the books, so payroll taxes are avoided. As a result, the employees do not get social security credit.
92. In fact, Lozada is an off-the -books employee of Big Shine.
93. The Profit-Making Companies generally provide no health or retirement benefits.
94. The Profit-Making Companies generally work the employees long hours, every day, without days off, without personal days, vacation days, or sick days, except on Saturdays and other holidays when the employees are required to spend all day at World Mission New Jersey.
95. The Profit-Making Companies generally do not pay overtime rates for hours worked beyond 40 hours a week.
96. The Profit-Making Companies, in conjunction with World Mission New Jersey, use and threaten to use discipline and intimidation on any employee or member who complains or who threatens to report these abuses to the authorities.
97. With respect to Big Shine, the abuse of the employees, as alleged herein, is perpetrated by or at the direction of Chang, Kim, Dong Lee, Bong Lee, and Jun Lee.
98. With respect to Albright, the abuse of the employees, as alleged herein, is perpetrated by or at the direction of Dong Lee, Tara Whalen, and Richard Whalen.
99. With respect to Lincoln Grill, the abuse of the employees, as alleged herein, is perpetrated by or at the direction of Dong Lee and Bong Lee.

100. On information and belief, most of the profits generated by the Profit-Making Companies as a result of this scheme are transferred back to World Mission New Jersey, in order to avoid taxation.
101. On information and belief, World Mission New Jersey sends those profits, or most of them, to World Mission South Korea.
102. Many of the transactions conducted by the Profit-Making Companies are conducted in cash, so as to avoid detection by tax authorities.
103. The transfer of money from the Profit-Making Companies to World Mission New Jersey and from World Mission New Jersey to World Mission South Korea is also often done in cash, so as to avoid detection by tax authorities.
104. In fact, cash earned by Lincoln Grill is transported to World Mission New Jersey in a shoebox, and kept in a safe in Dong Lee's office.
105. From time to time, Dong Lee places cash in sealed envelopes which he gives to members of World Mission New Jersey, who are instructed to personally travel to World Mission South Korea to deliver the envelopes. The members making such deliveries generally do not know what they are delivering, or why.
106. With respect to Big Shine, the financial improprieties, as alleged herein, are perpetrated by or at the direction of Chang, Kim, Dong Lee, Bong Lee, and Jun Lee.
107. With respect to Albright, the financial improprieties, as alleged herein, are perpetrated by or at the direction of Dong Lee, Tara Whalen, and Richard Whalen.
108. With respect to Lincoln Grill, the financial improprieties, as alleged herein, are perpetrated by or at the direction of Dong Lee and Bong Lee.

109. To further prevent this scheme from being detected, the Profit-Making Companies are documented to be owned not by World Mission New Jersey, but rather by individual members of World Mission New Jersey.
110. Such documentation is designed to create the appearance that World Mission New Jersey is not actually controlling the Profit-Making Companies.
111. Yet, in some cases the individual member of World Mission New Jersey whose name is listed as the legal owner of a Profit-Making Company is not aware of even the most fundamental details of the entity that such person supposedly owns.
112. In some cases, the individual member of World Mission New Jersey whose name is listed as the legal owner of a Profit-Making Company has had their name placed on corporate documents and banking documents without their knowledge or consent.
113. Generally, the fraudulent documentation, as alleged herein, is perpetrated by or under the direction of Dong Lee and Bong Lee.
114. All of the Defendants have conspired and agreed to conceal the crimes and fraud alleged herein.
115. All of the Defendants have conspired and agreed not to disclose the crimes and fraud alleged herein to the general public, or to World Mission New Jersey's members or donors who might withhold their membership or donations if they knew the truth about the criminal nature of the World Mission Enterprise.
116. All of the Defendants have repeatedly and continuously committed crimes and torts in furtherance of the criminal enterprise described herein.

D. Activities of World Mission New Jersey

117. World Mission New Jersey engages in three primary activities: services, studies, and recruiting.
118. "Services" are religious services held in a sanctuary filled with members of the church. The services are held numerous times throughout the week and three times on Saturday. Services are led by Dong Lee, or an agent assigned by Dong Lee.
119. "Studies" are classroom sessions, led by a teacher who has been selected and trained by World Mission New Jersey. Every new recruit is required to go through a number of basic studies.
120. "Recruiting" is the process by which World Mission New Jersey obtains new members.
121. Members of World Mission New Jersey are subjected to a great deal of pressure to recruit new members, including their friends and families.
122. On some occasions, World Mission New Jersey has imposed recruiting quotas on its members.
123. World Mission New Jersey generally engages in recruiting every day of the week, at various times of day, sometimes as late as 1 a.m.
124. Generally, on every Sunday afternoon, Dong Lee and his agents gather members of World Mission New Jersey and put them into groups, assigning each group to a recruiting location. The groups generally go to populated areas, such as big box stores, including Target and Walmart, or shopping malls.
125. At other times, World Mission New Jersey sends recruiters to college campuses.
126. World Mission New Jersey also sends recruiters into residential neighborhoods to go door-to-door.

127. The recruiters are trained by Dong Lee and Dong Lee's agents to use aggressive, intrusive, and deceptive tactics to induce unsuspecting people to join World Mission New Jersey.
128. Because World Mission New Jersey is a profit-making enterprise, it only recruits employed people who are able to meet the donation requirements.
129. World Mission New Jersey trains its members to conceal the true nature of the World Mission Enterprise, including its policies, practices, and beliefs, from new recruits and prospective recruits.

E. The World Mission Enterprise Uses Ostracization and Intimidation to Prevent Its Members From Exposing Its Criminal and Tortious Behavior

130. World Mission New Jersey uses a number of psychological control tactics, as described below, to prevent its members from exposing its criminal and tortious behavior.
131. These psychological control tactics are designed by Chang and Kim in the first instance, and subsequently implemented and enforced within World Mission New Jersey by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
132. For instance, World Mission New Jersey members are not permitted to express any doubts or criticisms about World Mission or its leaders.
133. Members who express such doubts will be called into a meeting with higher ranking members.
134. The higher ranking members will talk to the doubting member to try to overcome the doubts.
135. The higher ranking members will try to convince the doubting member to suppress or ignore the doubts.

136. If the doubts persist, then the doubting member will be severely ostracized by the rest of the group.
137. The doubting member will be physically separated from other members of the group.
138. At World Mission New Jersey services and study sessions, the doubting member will be required to sit surrounded by higher ranking members.
139. World Mission New Jersey tells doubting members who have family members in World Mission that if their doubts persist, the doubting member will no longer be able to remain in contact with their loved ones.
140. World Mission New Jersey threatens doubting members with being kicked out of World Mission.
141. In fact, World Mission New Jersey often kicks out doubting members.
142. World Mission New Jersey often requires its members to sign a Non-Disclosure Agreement ("NDA") which prohibits the member from discussing anything about World Mission New Jersey or the World Mission Enterprise with outsiders, even after the member leaves the group.
143. Members who refuse to sign NDAs after being asked to sign one are usually kicked out or threatened with being kicked out.
144. Once a person is kicked out of World Mission New Jersey, or any other World Mission entity, it becomes difficult or impossible for that person to maintain a relationship with their loved ones who are still members of World Mission.
145. Neither World Mission New Jersey nor any other World Mission entity permits its members to maintain relationships with former members of any World Mission entity.

146. World Mission New Jersey has a long history of instructing or requiring members of World Mission to divorce their spouses when their spouses begin expressing doubts about World Mission.
147. World Mission New Jersey has a long history of instructing or requiring members of World Mission to cut off communication with their families and friends when the families or friends begin expressing doubts about World Mission.
148. As a result of such tactics, many families have been broken up or destroyed.
149. There are countless people who have lost contact with their parents, children, spouses, or other family and friends, as a result of World Mission New Jersey's tactics.

F. The "Righteous Lie Doctrine"

150. All of the Defendants adhere to the "Righteous Lie Doctrine," which is a policy and practice of telling "Righteous Lies."
151. A "Righteous Lie" is a lie that is told to protect the World Mission Enterprise, or any of its constituent entities or leaders, or to advance the agenda of same.
152. Defendants believe that it is not immoral to lie in such circumstances because the ends justify the means.
153. Defendants generally do not disclose to people outside the World Mission Enterprise that they adhere to a policy and practice of telling "Righteous Lies."
154. Defendants do not disclose to people inside the World Mission Enterprise that they adhere to a policy and practice of telling "Righteous Lies," unless and until the person inside the World Mission Enterprise has demonstrated a sufficient amount of loyalty such that they can be trusted to tell "Righteous Lies."

155. The Righteous Lie Doctrine was created by Chang and Kim in the first instance (although not necessarily called that), and subsequently implemented and enforced within World Mission New Jersey by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.

II. THE PLAINTIFF'S INVOLVEMENT WITH WORLD MISSION NEW JERSEY

A. The Plaintiff's Recruitment Into World Mission New Jersey

156. In April, 2008, the Plaintiff met and began dating Mark Ortiz ("Mr. Ortiz"), her future husband.

157. In 2009, two of the Plaintiff's co-workers began trying to persuade her to attend their church with them.

158. The co-workers had told the Plaintiff that they really enjoyed attending their church, but they did not disclose to the Plaintiff anything about the church's beliefs, policies or practices.

159. In October 2009, on a Monday night, the Plaintiff agreed to attend the church with her co-workers. The Plaintiff expected that she would have to wait until the weekend to attend the church. Yet, her co-workers told her that she could attend that very night, after work.

160. The Plaintiff also assumed that she would be permitted to drive herself to the church. Yet, instead, her co-workers insisted on picking her up and taking her to the church. This caused the Plaintiff to end up at the church without access to her own vehicle.

161. The church they brought her to was World Mission New Jersey.

162. From that night forward, everything that World Mission New Jersey did to, for, and with the Plaintiff was done pursuant to policies and practices that had been designed by Chang

and Kim in the first instance, and subsequently implemented and enforced within World Mission New Jersey by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.

163. Upon arriving at World Mission New Jersey, the Plaintiff was given a questionnaire to fill out. The questionnaire was designed to acquire background information about the Plaintiff that World Mission New Jersey could use to manipulate her.
164. Then the Plaintiff was brought into a small room with a dry erase board and a small table with a few chairs. She sat there with her two co-workers as another member of the church presented her with her first "study lesson."
165. None of the other church members were present in the room. The Plaintiff subsequently learned that new recruits are kept separated from more experienced church members during their first few study lessons.
166. Almost immediately, the church began systematically and deliberately indoctrinating the Plaintiff with irrational fears.
167. For instance, World Mission New Jersey indoctrinated the Plaintiff to believe that terrible things would happen to her if she used the Internet to conduct research on World Mission New Jersey. The reason World Mission New Jersey did that was to prevent the Plaintiff from learning the truth about World Mission New Jersey's criminal and unethical behavior.
168. The first demand the church made on the Plaintiff was that she had to be baptized into the church. After being subjected to intense social pressure, the Plaintiff was unduly influenced into being baptized.

169. After being baptized, a deacon at the church entered the Plaintiff's name, address, and phone number into a huge book. In that book, he also entered the names of the two co-workers who had recruited her. The Plaintiff later learned that the co-workers who had recruited the Plaintiff were being given "credit" for having recruited her.
170. The co-workers had not previously disclosed to the Plaintiff that they had been given recruiting quotas and that they brought the Plaintiff to the church in order to fulfill those quotas.
171. The church also demanded that the Plaintiff come back for additional study lessons later that week. At the time, the Plaintiff was taking dance classes a few nights a week, and was not looking for a religion that would impose a full-time commitment on her. Again, after being subjected to intense social pressure, the Plaintiff was unduly influenced and agreed to return later in the week.
172. At the time of her recruitment into World Mission New Jersey, the Plaintiff had been dating her boyfriend, Mr. Ortiz, for over one year.
173. About two weeks after joining World Mission New Jersey, the Plaintiff recruited Mr. Ortiz into World Mission New Jersey. The Plaintiff had been led to believe that World Mission New Jersey encouraged family members, friends, and significant others to participate in World Mission New Jersey together.
174. Mr. Ortiz was subsequently baptized by World Mission New Jersey.
175. The Plaintiff also recruited her 15 year old son into World Mission.
176. The Plaintiff began attending World Mission New Jersey on Tuesdays and Saturdays, and occasionally at additional times during the week.
177. The Plaintiff was told to complete a number of "Basic Studies."

178. However, when the Plaintiff went to complete the Basic Studies, World Mission New Jersey told her that she had to study separately from Mr. Ortiz and separately from her son.
179. The Plaintiff learned that World Mission New Jersey generally prohibited men and women from studying together.
180. World Mission New Jersey also imposed assigned seating at all of its services. Men and women were generally seated separately from each other.
181. As a result, married couples and families could not usually sit together during services.
182. With few exceptions, World Mission New Jersey did not permit the Plaintiff to sit with Mr. Ortiz or with her son during services.
183. World Mission New Jersey also did not permit the Plaintiff to attend study sessions with Mr. Ortiz or with her son.
184. The Plaintiff also came to learn that some of the study sessions were as long as six hours.
185. The Plaintiff eventually learned that most of the members spent their entire Saturday with World Mission New Jersey, starting from about 9 am (and on special holidays as early as 5 am) to 10 pm.
186. During that time, the members would attend up to three services.
187. In between the services, the members would engage in other activities pertaining to World Mission New Jersey.
188. Sometimes, those other activities consisted of watching propaganda videos produced by World Mission.
189. The propaganda videos usually touted the supposedly exceptional qualities of Chang, the "Mother God."

190. The propaganda videos were designed to indoctrinate the members with irrational fears. For instance, some of the videos would describe various kinds of disasters, accompanied by the message that anyone who fails to comply with the demands of World Mission or Chang, or any of her agents (such as Kim or Dong Lee) will suffer the same fate as the people who perished in the disasters.

B. The Increasing Time Commitment

191. Shortly after joining World Mission New Jersey, the Plaintiff began to feel pressure from World Mission New Jersey to spend her entire Saturday at World Mission New Jersey.

192. Dong Lee told the Plaintiff, and the other members, that they should not question the amount of time that World Mission New Jersey expects them to spend at World Mission New Jersey.

193. When the Plaintiff would complain about the amount of time she was being asked to spend at World Mission New Jersey, World Mission New Jersey and Dong Lee would manipulate her by making her feel guilty, fearful, or ashamed about the fact that she wanted to devote less time to World Mission New Jersey.

194. As a result of such pressure, the Plaintiff was unduly influenced into increasing her attendance, and she began attending two services on Saturdays.

195. From the beginning, World Mission New Jersey assigned a group of "older sisters" to the Plaintiff.

196. The older sisters were experienced members of World Mission New Jersey whose role was to groom the Plaintiff to bring her into a state of compliance with World Mission New Jersey's demands.

197. The Plaintiff soon began receiving text messages from her older sisters on Fridays or Saturdays, asking what time she would be at World Mission New Jersey for services.
198. The frequency of the text messages from the older sisters increased, until the messages were being sent every single day.
199. Eventually, the older sisters began sending the text messages to the Plaintiff while she was at work.
200. The time commitment that World Mission New Jersey demanded from the Plaintiff steadily increased month after month.
201. Six months after joining World Mission New Jersey, the Plaintiff and Mr. Ortiz became engaged to be married.
202. A month after that, they bought a home together.
203. The Plaintiff began to feel overwhelmed by the amount of time she was required to spend with World Mission New Jersey while undergoing these life transitions.
204. After a while, Saturdays were not enough for World Mission New Jersey. The Plaintiff was pressured to attend World Mission New Jersey on Sundays, as well.
205. Before long, the Plaintiff was unduly influenced into attending World Mission New Jersey all day Saturday and Sunday, every weekend, as well as a few days a week after work.

C. Sleep Deprivation

206. Defendants deliberately deprived the Plaintiff of sleep, in order to weaken her mind and make her more susceptible to World Mission New Jersey's demands.
207. For instance, World Mission New Jersey holds a number of "Feasts" during the year.

208. During the Feasts, members are required to attend services at 5:00 am and then again at 7:30 pm for up to ten days at a time.
209. The Plaintiff tried attending the 5:00 am services but found that it was nearly impossible for her.
210. The Plaintiff did attend the 7:30 pm services despite being exhausted after a long day at work.

D. Family Separation

211. The Plaintiff's family (mother, stepfather, and sister) became increasingly concerned about the amount of time that the Plaintiff was spending at World Mission New Jersey.
212. The Plaintiff tried numerous times to get her family to join World Mission New Jersey, but to no avail.
213. World Mission New Jersey pressured the Plaintiff to choose between World Mission New Jersey or her family.
214. World Mission New Jersey did not want the Plaintiff to attend her nephew's birthday party because it was on a Saturday. As a result of enormous social pressure, the Plaintiff was unduly influenced into skipping her nephew's birthday party so that she could spend the day at World Mission New Jersey.
215. This was the first of many conflicts that World Mission New Jersey would cause between the Plaintiff and her mother, stepfather, and sister.
216. The Plaintiff eventually learned that World Mission New Jersey views families as a "distraction," and that members are discouraged from having children.
217. The Plaintiff also learned that World Mission New Jersey discourages its members from taking vacations.

218. In early 2010, the Plaintiff and Mr. Ortiz met with Dong Lee to discuss their relationship.
219. At that meeting Dong Lee attempted to split them up.
220. Dong Lee told the Plaintiff and Mr. Ortiz that they were not good together and that they should each be with other people.
221. Nevertheless, the couple stayed together.
222. On May 9, 2010, the Plaintiff and Mr. Ortiz were married.
223. After that, the Plaintiff and Mr. Ortiz left for their honeymoon in Mexico. That would be the last vacation they would spend together.
224. Dong Lee was unhappy that the couple had decided to get married. He attempted to control the couple even while they were honeymooning. Before they left, Dong Lee advised them to spend their honeymoon time reading a book written by Kim.
225. When the couple returned, World Mission New Jersey dramatically increased the pressure on the couple to spend more time with World Mission New Jersey.

E. The Plaintiff Was Conscripted to Recruit New Members

226. After their honeymoon, World Mission New Jersey instructed the Plaintiff to spend a lot more time on recruiting new members.
227. On Sundays, World Mission New Jersey sent the Plaintiff and her "sisters" to recruit new members.
228. They would go to crowded areas, like shopping malls, or large box stores, such as Target or Walmart.
229. They would walk up to complete strangers and ask them things like if they had ever heard about the "Mother God."
230. Most people would reject them.

231. On a few occasions, security had to ask them to leave because customers were complaining about the aggressive and intrusive tactics used by the Plaintiff's "sisters."

232. The Plaintiff naturally felt anxious and humiliated during those recruiting attempts.

F. The Plaintiff Encounters the "Righteous Lie Doctrine"

233. Eventually, the Plaintiff began having doubts about World Mission.

234. When she began questioning Dong Lee, she discovered that Dong Lee was relying on the "Righteous Lie Doctrine."

235. For instance, after the Plaintiff caught Dong Lee lying to her about an alleged translation error in a World Mission book, Dong Lee convinced Mr. Ortiz that if Dong Lee had lied it was excusable, because Dong Lee was trying to "save" the Plaintiff.

236. In other words, Dong Lee had adopted an "ends justifies the means" strategy, and was willing to lie in order to advance World Mission's agenda.

G. The Plaintiff Uncovers the Truth

237. In or around October 2010, the Plaintiff met with Dong Lee to discuss her doubts. Mr. Ortiz attended that meeting as well.

238. The Plaintiff was surprised to learn at that meeting that one of the women that recruited her had recently left her husband because he had decided to stop attending World Mission New Jersey.

239. Eventually the Plaintiff ventured onto the Internet, and discovered disturbing information about World Mission New Jersey, which caused her to start questioning its practices.

240. For instance, she discovered a website that labeled World Mission New Jersey as a "cult."

241. She also found stories from former members which described World Mission New Jersey's abusive practices.

242. She learned about Robert J. Lifton, a famous psychiatrist who created a model to explain the process of "thought reform," whereby a person can be made to change his or her mind without informed consent.
243. The Plaintiff recognized that World Mission New Jersey was using the thought reform techniques that Lifton identified.
244. The Plaintiff was shocked and dismayed when she discovered that information.
245. The same day that the Plaintiff found critical information about World Mission New Jersey on the Internet, she shared that information with Mr. Ortiz.
246. Mr. Ortiz reacted the same way the Plaintiff had. He was shocked. He admitted that he and the Plaintiff had been fooled. He wondered why an organization would take advantage of people like that. He said that he felt "lost" and did not know "where to go now."
247. At that time, Mr. Ortiz was on the third day of a three-day fast, mandated by World Mission New Jersey. The Plaintiff was not participating in the fast, but Mr. Ortiz was starving. The Plaintiff and Mr. Ortiz decided to go to dinner, and not attend World Mission New Jersey that evening as they were scheduled to do.
248. World Mission New Jersey takes attendance at every service and study. As a result, World Mission New Jersey quickly discovered that the Plaintiff and Mr. Ortiz were not there.
249. That night, the Plaintiff and Mr. Ortiz were each separately contacted by members of World Mission New Jersey wanting them to explain their absence.
250. The Plaintiff explained that they had found disturbing information on the Internet that caused them to reconsider whether they should return to World Mission New Jersey.

251. World Mission New Jersey members, acting as agents of World Mission New Jersey and Dong Lee, pressured the Plaintiff and Mr. Ortiz to attend a meeting with Dong Lee.
252. The World Mission New Jersey members promised the Plaintiff and Mr. Ortiz that all of their questions would be answered.
253. The World Mission New Jersey members assured the Plaintiff and Mr. Ortiz that all of the information they had found on the Internet was lies.
254. A few days later, the Plaintiff and Mr. Ortiz went to World Mission New Jersey's location in Ridgewood, New Jersey, to meet with Dong Lee.
255. When they arrived in Dong Lee's office, there were other members present, including Lozada.
256. During that meeting, Dong Lee gave the Plaintiff assurances that all of her questions would be answered.
257. At that meeting, it was explained to the Plaintiff that World Mission is persecuted on the Internet by people spreading lies about "Father" (Ahn Sahng Hong) and "Mother" (Chang).
258. The Plaintiff asked Dong Lee why faithful members of World Mission New Jersey separated from their non-believing spouses.
259. Dong Lee explained that the non-believing spouses usually had a problem with how much time their spouse was spending in World Mission New Jersey. According to Dong Lee, the non-believing spouse would usually try to make the member choose between remaining a member or staying in the marriage.
260. Notwithstanding Dong Lee's explanation, it is in fact Dong Lee himself who usually makes the decision as to whether a member should leave their non-believing spouse.

Dong Lee frequently orders people to get divorced, if not directly then through his agents. People who refuse to get divorced after being ordered to do so are subjected to extreme intimidation, which is inflicted through the manipulation of guilt, shame, fear, and social pressure.

261. After the meeting, the Plaintiff and Mr. Ortiz attended another service at World Mission New Jersey. At that service, the Plaintiff was required to sit with Mr. Ortiz so that she would not "contaminate" her "sisters" with her doubts.
262. Yet, when the Plaintiff asked one of World Mission New Jersey's deaconesses for an explanation of why she was being told to sit with Mr. Ortiz, the deaconess lied to her, and told her that "sometimes married couples sit together," even though the Plaintiff had never observed married couples sitting together at a service prior to that day.
263. At the end of that service, Dong Lee explicitly stated that it was not acceptable for members of World Mission New Jersey to ask questions about information they acquired from the Internet.
264. Dong Lee made an exception for new members who had not finished their Basic Studies yet. However, if a member asked questions after having completed the Basic Studies, then according to Dong Lee, the member was "stupid."
265. Dong Lee made this announcement just a few days after having promised the Plaintiff and Mr. Ortiz that all of their questions would be answered.

H. World Mission New Jersey Retaliates Against the Plaintiff

266. Shortly thereafter, the Defendants launched a campaign to retaliate against the Plaintiff.
267. The Defendants began pressuring Mr. Ortiz to spend more time away from the Plaintiff, and more time with World Mission New Jersey.

268. The Defendants repeatedly told Mr. Ortiz that he needed to "learn and study more."
269. The Defendants told Mr. Ortiz bad things about the Plaintiff with the intent of poisoning their relationship.
270. The Defendants required Mr. Ortiz to attend World Mission New Jersey every day after work and kept him there until after midnight.
271. The Defendants told Mr. Ortiz to move out of the marital home and get divorced.
272. At the urging of World Mission New Jersey, Mr. Ortiz moved out one Friday while the Plaintiff was at work.
273. World Mission New Jersey told Mr. Ortiz not to tell the Plaintiff where he would be living.
274. After a few days, Mr. Ortiz blackmailed the Plaintiff by offering to move back into their marital home on the condition that the Plaintiff return to World Mission New Jersey once a week. As a result, the Plaintiff was unduly influenced into returning to World Mission New Jersey.
275. Then, World Mission New Jersey required the Plaintiff to repeat the Basic Studies.
276. When the Plaintiff returned to World Mission New Jersey, she found that she was being ostracized by the other members.
277. World Mission New Jersey required the Plaintiff to complete the Basic Studies with Dong Lee, rather than with one of the other teachers who would ordinarily teach the Basic Studies.
278. World Mission New Jersey also required the Plaintiff to complete the Basic Studies in Dong Lee's office, rather than in one of the designated study rooms where the Basic Studies would ordinarily be taught.

279. Dong Lee became very frustrated with the Plaintiff when she would ask questions during the Basic Studies.
280. When the Plaintiff asked Dong Lee about divorce, Dong Lee made it clear that he believes that loyalty to World Mission New Jersey is more important than being married.
281. After that, the Plaintiff attended only one more service with World Mission New Jersey.
282. The Plaintiff wanted to sit with Mr. Ortiz during that service, and she assumed that it would not be a problem to sit with her husband, since she had been allowed to sit with him once before. She was wrong. World Mission New Jersey pretended that no one knew where Mr. Ortiz was so that she would not be able to sit with him.
283. As a result, the Plaintiff ended up having to sit with the other women, between two high-ranking members, including Tara Whalen, to prevent the Plaintiff from interacting with and "contaminating" other members with her doubts.

I. World Mission New Jersey Hacks Into the Plaintiff's Internet Accounts

284. The Plaintiff subsequently began posting statements to the Internet that were critical of the World Mission Enterprise and World Mission New Jersey.
285. The Plaintiff posted those statements anonymously because she feared retaliation from World Mission New Jersey.
286. In or around 2009, Jun Lee, working with other agents of World Mission New Jersey and acting under the direction and supervision of the other Defendants, helped to establish a bogus website to entrap critics of World Mission New Jersey and the World Mission Enterprise.
287. The bogus website was located at the following URL: cultwatchahnsahnghong.com (the "Cult Watch Site").

288. The Cult Watch Site promoted itself as a website that was critical of cults.
289. The Cult Watch Site contained criticisms of World Mission.
290. The Plaintiff found the Cult Watch Site, and began anonymously posting information that was critical of World Mission to the Cult Watch Site.
291. In order to post information to the Cult Watch Site, the Plaintiff needed to register with the Cult Watch Site by entering her email address and a password.
292. The Plaintiff did not realize that by doing that, she was inadvertently giving her email address and password to World Mission New Jersey.
293. World Mission New Jersey then used the Plaintiff's email address and password to attempt to hack into other Internet sites containing anonymous postings regarding World Mission.
294. Through trial and error, World Mission New Jersey eventually uncovered other anonymous postings that were made by the Plaintiff.
295. World Mission New Jersey then disclosed to Mr. Ortiz and other members of World Mission New Jersey that the Plaintiff was the anonymous author behind those statements.
296. World Mission New Jersey used the information it had acquired through hacking to poison the relationship between Mr. Ortiz and the Plaintiff. Specifically, World Mission New Jersey told Mr. Ortiz that it had "evidence" that the Plaintiff had posted critical statements about World Mission.
297. Mr. Ortiz became angry at the Plaintiff, telling her that World Mission New Jersey had "evidence" against her.

J. World Mission New Jersey Destroys the Plaintiff's Marriage

298. At the urging of Dong Lee, Mr. Ortiz became less attentive and affectionate towards the Plaintiff.
299. Although their first anniversary was approaching, Mr. Ortiz was uninterested in making plans to celebrate.
300. When the Plaintiff suggested that they go away for a couple of days, Mr. Ortiz refused, saying that he could not be away from World Mission New Jersey because the apocalypse was coming soon and he needed to be ready.
301. On their anniversary, Mr. Ortiz still had not committed to any plans, and spent most of the day at World Mission New Jersey.
302. On or around that same day, World Mission New Jersey selected Mr. Ortiz to participate in an intense study program.
303. That program required Mr. Ortiz to be at World Mission New Jersey every day for a month until very late, and all day on Sundays.
304. World Mission New Jersey generally does not select people for that program until they have been in World Mission New Jersey for significantly longer than Mr. Ortiz had been at the time.
305. World Mission New Jersey selected Mr. Ortiz for that program in order so that he would not be able to spend any more time with the Plaintiff.
306. Not only did World Mission New Jersey keep Mr. Ortiz until midnight every night, but it then required Mr. Ortiz to stay up reading World Mission books until almost two o'clock in the morning.
307. World Mission New Jersey also required Mr. Ortiz to wake up at five o'clock in the morning to engage in activities that World Mission New Jersey had assigned him.

308. By doing all of this, World Mission New Jersey kept both the Plaintiff and Mr. Ortiz deprived of sleep.

309. As a result, both the Plaintiff and Mr. Ortiz became exhausted and fatigued, which placed a further strain on their relationship.

310. Finally, Mr. Ortiz moved out of the marital home permanently, and filed for divorce.

K. World Mission New Jersey Attempts to Coerce the Plaintiff Into Signing a Non-Disclosure Agreement

311. Dong Lee arranged a meeting on April 22, 2011 with the Plaintiff to discuss the statements that she had posted to the Internet.

312. At that meeting, Dong Lee presented the Plaintiff with an NDA, and began pressuring her to sign it.

313. Dong Lee lied to the Plaintiff by claiming that the purpose of the NDA was to protect the Plaintiff.

314. Dong Lee explained to the Plaintiff that World Mission would agree not to say anything bad about the Plaintiff if the Plaintiff would agree not to say anything bad about World Mission.

315. The Plaintiff was shocked by this, because she had not done anything wrong. There was nothing bad for World Mission to say about her.

316. Moreover, the NDA actually did not contain a clause that would prohibit World Mission from saying anything bad about the Plaintiff. It only prevented the Plaintiff from saying anything bad about World Mission.

317. The Plaintiff requested that Dong Lee show her the "evidence" that it had showed Mr. Ortiz regarding the critical statements she had posted.

318. Dong Lee refused to produce any such evidence.

319. Dong Lee then accused the Plaintiff of posting critical statements about World Mission to the anti-cult website, RickRoss.com.
320. Again, the Plaintiff asked Dong Lee to produce some proof, and he refused.
321. Dong Lee said he would not show the Plaintiff the proof until she signed the NDA.
322. The Plaintiff refused to sign the NDA.
323. Dong Lee continued to pressure the Plaintiff to sign the NDA, implicitly threatening to defame her if she did not sign it.
324. Dong Lee began making excuses as to why he wanted the Plaintiff to sign the NDA. For instance, Dong Lee said he was concerned that the Plaintiff might steal World Mission's intellectual property, such as the materials for the Basic Studies. Yet, that material is already publicly available on World Mission's website.
325. Dong Lee tried to intimidate the Plaintiff, by telling her that in the past he had sued people for criticizing World Mission, and telling her that he would do the same to the Plaintiff if she did not sign the NDA.
326. Dong Lee admitted to the Plaintiff that in the past World Mission has had a problem with "several people" who were "exposing everything." Dong Lee then said that if the Plaintiff was "one of them then you got trouble."
327. Dong Lee would not allow the Plaintiff to take a copy of the NDA with her to show a lawyer before signing it.
328. Dong Lee continued to refuse to show the Plaintiff the evidence of what she had posted.
329. When the Plaintiff asked Dong Lee how he could know that she was the one who had posted the statements, Dong Lee claimed that World Mission New Jersey had requested the Plaintiff's IP address and email address from the forums containing the posts, and that

- 4) The Defendants repeatedly and falsely claimed that the leaders of World Mission New Jersey were unpaid volunteers who were not paid by World Mission New Jersey, even though many of them are either paid by World Mission New Jersey or by the Profit-Making Companies which are controlled by World Mission New Jersey.
 - 5) The Defendants repeatedly and falsely claimed that the church does not engage in profit-making enterprises.
338. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis made false representations in order to intentionally mislead the Plaintiff into believing that World Mission New Jersey was a pro-family organization that welcomed families into its membership and that encouraged families to remain strong and intact. Those false representations included, but not were limited to, the following:
- 1) The Defendants repeatedly and falsely claimed that World Mission New Jersey encouraged family interaction.
 - 2) The Defendants repeatedly and falsely claimed that World Mission New Jersey strove to bring families together.
 - 3) The Defendants repeatedly sponsored "Family Unity" events in order to create the false impression that World Mission New Jersey promoted family unity.
339. The false representations alleged herein are material, in that if the false representations had not been made, the Plaintiff would not have joined World Mission New Jersey,

- continued as a member of World Mission New Jersey, or donated money, time and energy to World Mission New Jersey.
340. At all times when material false representations were made, as alleged herein, the Defendants knew such representations were false or dishonest, deceptive and misleading.
341. The Defendants made material false representations, as alleged herein, with the intent to defraud and deceive the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated, and which Defendants knew she would not have otherwise donated.
342. The Defendants made material false representations, as alleged herein, with the intent that the Plaintiff would rely on such false representations when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.
343. The Plaintiff justifiably relied on the Defendants' false representations, as alleged herein, when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.
344. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
345. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

346. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
347. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
348. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
349. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
350. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
351. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
352. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;

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

CAUSE OF ACTION #2

INTENTIONAL FRAUD

(Arising Out of Non-Disclosures)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

353. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
354. The Defendants failed to disclose at the time of the Plaintiff's recruitment in October 2009:
- 1) that their agenda was to turn the Plaintiff into a recruiter and fundraiser for World Mission New Jersey;
 - 2) that the Plaintiff would be given a recruiting quota which she would be expected to meet as a condition of remaining a member of World Mission New Jersey;
 - 3) that if the Plaintiff became a member of World Mission New Jersey she would be subjected to an increasing time commitment which would eventually cause all of her free time to be consumed by World Mission New Jersey;
 - 4) that the schedule imposed by World Mission New Jersey would cause the Plaintiff to be deprived of sleep;

- 5) that World Mission New Jersey frequently discourages its members from taking vacations;
- 6) that if the Plaintiff became a member of World Mission New Jersey the Plaintiff would be expected to sacrifice her vacation time to serve the interests of World Mission New Jersey;
- 7) that if the Plaintiff became a member of World Mission New Jersey the Defendants would not permit the Plaintiff to express any doubts or criticisms about the Defendants;
- 8) that if the Plaintiff became a member of World Mission New Jersey the Defendants would use intimidation or coercion tactics, as alleged herein, to prevent the Plaintiff from expressing any doubts or criticisms about the Defendants;
- 9) that if the Plaintiff became a member of World Mission New Jersey the Defendants would use intimidation or coercion tactics, as alleged herein, to retaliate against the Plaintiff if she expressed any doubts or criticisms about the Defendants;
- 10) that the Defendants adhered to a policy and practice of kicking out members who expressed doubts or criticisms about the Defendants;
- 11) that members of World Mission New Jersey are not permitted to maintain contact with former members of World Mission New Jersey;
- 12) that the Defendants adhere to a policy and practice of telling "Righteous Lies";
- 13) that World Mission New Jersey views families as a "distraction," and

14) that members of World Mission New Jersey are discouraged from having children.

355. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis failed to disclose:

- 1) that money donated to World Mission New Jersey would be used for non-charitable or non-tax exempt purposes;
- 2) that World Mission New Jersey obtained its tax exemption from the IRS by fraudulent means, as alleged herein;
- 3) that World Mission New Jersey fraudulently uses its tax exemption number to purchase inventory for the Profit-Making Companies;
- 4) that the World Mission Enterprise and its constituents have a history of causing people to become suicidal, depressed, anxious, psychotic, or alienated from their families;
- 5) that members of World Mission New Jersey are trained to conceal the criminal and profiteering nature of World Mission from new recruits and prospective recruits;
- 6) that World Mission New Jersey dominates and controls the Profit-Making Companies;
- 7) that the members of World Mission New Jersey who are employed to staff the Profit-Making Companies are subjected to conditions of slavery, exploitation, and abuse, as alleged herein;

- 8) that World Mission New Jersey has a long history of breaking up families and preventing family members from remaining in contact with one another;
 - 9) that, at the time the Plaintiff was recruited, the Defendants had already received many complaints from members and former members of World Mission New Jersey who had lost contact with their parents, children, spouses, or other family and friends, as a result of World Mission's actions;
 - 10) that World Mission subjects its members to psychologically coercive techniques and undue influence so as to induce compliance in its members without the members' informed consent;
 - 11) that, at the time the Plaintiff was recruited, the Defendants had already received many complaints from members and former members of World Mission New Jersey who had accused World Mission of subjecting its members to psychologically coercive techniques and undue influence so as to induce compliance in its members without the members' informed consent;
 - 12) that the Defendants have actively worked to conceal the criminal nature of the World Mission Enterprise by waging vicious campaigns of harassment against anyone who has dared to present the truth to the public, sometimes bringing lawsuits against critics to harass them into silence; and
 - 13) that the website cultwatchahnsahnghong.com was owned and operated by the Defendants for the purpose of stealing the passwords of World Mission critics so that the Internet and email accounts of the critics could be hacked.
356. World Mission South Korea and World Mission New Jersey each had a duty to disclose the information alleged herein because each corporation was aware of the information,

and deliberately concealed said information in order to induce the Plaintiff into donating money, time, and energy to World Mission New Jersey that she otherwise would not have donated.

357. All of the natural person Defendants had a duty to disclose the information alleged herein because each of them was aware of the information, and deliberately concealed said information in order to induce the Plaintiff into donating money, time, and energy to World Mission New Jersey that she otherwise would not have donated.
358. Moreover, all of the natural person Defendants had a duty to disclose the information alleged herein by virtue of their positions of authority and responsibility within World Mission South Korea or World Mission New Jersey.
359. The nondisclosures alleged herein are material, in that if the nondisclosed information had been disclosed, the Plaintiff would not have joined World Mission New Jersey, continued as a member of World Mission New Jersey, or donated money, time and energy to World Mission New Jersey.
360. At all times when material information was not disclosed, the Defendants knew such nondisclosures would create an impression of World Mission South Korea, World Mission New Jersey, and the World Mission Enterprise, that was false or dishonest, deceptive and misleading.
361. The Defendants failed to disclose material information, or concealed material information, as alleged herein, with the intent to defraud and deceive the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated, and which Defendants knew she would not have otherwise donated.

362. The Defendants failed to disclose material information, or concealed material information, as alleged herein, with the intent that the Plaintiff would rely on such nondisclosures when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.
363. The Plaintiff justifiably relied on the Defendants' non-disclosures, as alleged herein, when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.
364. As a direct and proximate result of the Plaintiff's reliance on the nondisclosures alleged herein, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
365. As a direct and proximate result of the Plaintiff's reliance on the nondisclosures alleged herein, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
366. As a direct and proximate result of the Plaintiff's reliance on the nondisclosures alleged herein, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
367. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

368. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
369. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
370. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
371. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
372. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #3

INTENTIONAL FRAUD

(Arising Out of Cult Watch Site)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

373. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

374. In or around 2009, and continuing through April 2011, the Defendants with a significant contribution from Jun Lee, conspired to set up and maintain the Cult Watch Site, and to make false representations in order to intentionally mislead the Plaintiff into believing the Cult Watch Site was owned and operated by critics of World Mission. Those false representations included, but were not limited to, the following:

- 1) The Cult Watch Site was located at a URL which falsely implied that the owners of the website believed that World Mission was a cult: cultwatchahnsahnghong.com.
- 2) The Cult Watch Site contained the following heading which falsely implied that the owners of the website believed that World Mission was a cult: "Cult Watch Ahnsahnghong Exposing the World Mission Society Church of God."
- 3) The Cult Watch Site contained the following misleading paragraphs, as shown in Exhibit A, attached hereto:

Hello and welcome. This website was set up by ex Church of God members and pastors for the purpose of educating those deceived into joining the World Mission Society Church of God.

If you or a family member are considering joining this group, who worship the false idols

Ahnsahnghong (sometimes spelled Ahn Sang-hong or Ahn Sahng hong) and Mother Jerusalem, please read this website carefully. Testimonies of ex WMS-COG members wil [sic] continue to be added.

- 4) The Cult Watch Site contained a long list of Questions and Answers that were specifically designed to create the false impression that the Cult Watch Site was owned and operated by people who were critical of the WMSCOG. Those Questions and Answers are shown in Exhibit B, attached hereto.
375. The false representations alleged herein are material, in that if the false representations had not been made, the Plaintiff would not have registered as a user of the Cult Watch Site, and would not have inadvertently given her email address and password to World Mission New Jersey, thereby enabling the Defendants to hack into the Plaintiff's Internet accounts.
376. At all times when material false representations were made, as alleged herein, the Defendants knew such representations were false or dishonest, deceptive and misleading.
377. The Defendants made material false representations, as alleged herein, with the intent to defraud and deceive the Plaintiff into giving her email address and password to World Mission New Jersey, which she would not have otherwise done, and which Defendants knew she would not have otherwise done.
378. The Defendants made material false representations, as alleged herein, with the intent that the Plaintiff would rely on such false representations when deciding to give her email address and password to the Cult Watch Site.
379. The Plaintiff justifiably relied on the Defendants' false representations, as alleged herein, when deciding to give her email address and password to the Cult Watch Site.

380. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she inadvertently gave her email address and password to World Mission New Jersey, which then used her email address and password to hack into her Internet accounts.
381. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
382. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
383. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
384. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
385. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

386. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
387. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
388. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #4

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

389. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
390. Taken together, the actions and omissions of the Defendants, as alleged throughout this Complaint, constitute extreme and outrageous conduct, in that their actions are so extreme so as to exceed all bounds of conduct usually tolerated in a civilized community.

391. Specifically, the Defendants' extreme and outrageous conduct includes:

- 1) the false representations made by the Defendants, as alleged in Cause of Action #1, which caused the Plaintiff to donate money, time, and energy to World Mission New Jersey which she would not have otherwise donated, and which prevented the Plaintiff from being able to make informed decisions about her involvement with World Mission New Jersey;
- 2) the failure of the Defendants to disclose material facts, as alleged in Cause of Action #2, which caused the Plaintiff to donate money, time, and energy to World Mission New Jersey which she would not have otherwise donated, and which prevented the Plaintiff from being able to make informed decisions about her involvement with World Mission New Jersey;
- 3) the false representations made by the Defendants with respect to the Cult Watch Site, as alleged in Cause of Action #3, which caused the Plaintiff to inadvertently give her email address and password to World Mission New Jersey;
- 4) the hacking into the Plaintiff's Internet accounts by the Defendants, as alleged herein;
- 5) the disclosure, by the Defendants, of private information obtained by hacking into the Plaintiff's Internet accounts, as alleged herein;
- 6) the coercive, manipulative, and deceptive manner in which the Defendants and their agents unduly influenced the Plaintiff into joining World Mission New Jersey, as alleged herein;

- 7) the coercive, manipulative, and deceptive manner in which the Defendants and their agents unduly influenced the Plaintiff into increasing her time commitment to World Mission New Jersey, as alleged herein;
- 8) the efforts by the Defendants to instill irrational fears in the Plaintiff, as alleged herein;
- 9) the efforts by the Defendants to weaken the Plaintiff's mind by depriving her of sleep, as alleged herein;
- 10) the efforts by the Defendants to alienate the Plaintiff from her mother, stepfather, sister, and nephew, as alleged herein;
- 11) the coercive, manipulative, and deceptive manner in which the Defendants and their agents unduly influenced the Plaintiff into becoming a recruiter and fundraiser for the profit-making World Mission Enterprise, without paying compensation to the Plaintiff, as alleged herein;
- 12) the efforts by the Defendants to make the Plaintiff feel intimidated, guilty, and ashamed for asking appropriate questions, as alleged herein;
- 13) the efforts by the Defendants to ostracize and humiliate the Plaintiff after she began asking questions, as alleged herein;
- 14) the showing of the Plaintiff's picture to members of the church accompanied by instructions to church members not to have any communications with the Plaintiff;
- 15) the coercive, manipulative, and deceptive manner in which the Defendants and their agents attempted to make the Plaintiff sign the NDA; and

- 16) any other actions and omissions that caused emotional distress for the Plaintiff but which she has yet to discover were caused by the Defendants.
392. The Defendants engaged in this extreme and outrageous conduct with the intention of causing, or with reckless disregard of the probability of causing, emotional distress in the Plaintiff.
393. The Defendants' extreme and outrageous conduct was neither justified nor privileged.
394. The Plaintiff did not knowingly consent to the Defendants' extreme and outrageous conduct.
395. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was caused to suffer severe emotional distress, which was so extreme that no reasonable person could be expected to endure it.
396. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
397. As a direct and proximate result of the willful, wrongful, intentional and reckless extreme and outrageous acts of the Defendants, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
398. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

399. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
400. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
401. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
402. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
403. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #5

411. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
412. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
413. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
414. The Defendants' conduct, as alleged herein, was grossly negligent.
415. The Plaintiff was not a beneficiary of World Mission South Korea.
416. Alternatively, if the Plaintiff was a beneficiary of World Mission South Korea, then the Plaintiff would not have been a beneficiary of World Mission South Korea, to any degree, but for the Defendants' negligent nondisclosures, as alleged herein.
417. The Plaintiff was not a beneficiary of World Mission New Jersey.
418. Alternatively, if the Plaintiff was a beneficiary of World Mission New Jersey, then the Plaintiff would not have been a beneficiary of World Mission New Jersey, to any degree, but for the Defendants' negligent nondisclosures, as alleged herein.
419. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #6

BREACH OF FIDUCIARY DUTY

(Against Dong Lee)

420. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

421. Dong Lee owed fiduciary duties to the Plaintiff, arising out of the following facts:

- 1) Dong Lee knowingly undertook to act for the benefit of the Plaintiff, by promising spiritual guidance and establishing a clergy-parishioner relationship with the Plaintiff;
- 2) in order for Dong Lee to provide such guidance to the Plaintiff, it was necessary for the Plaintiff to place her trust in him;
- 3) Dong Lee knew that material false representations were being made to the Plaintiff, as alleged in Cause of Action #1;

- 4) Dong Lee knew that material information was being concealed from the Plaintiff or left undisclosed to the Plaintiff, as alleged in Cause of Action #2;
 - 5) Dong Lee knew that material false representations were being made to the Plaintiff, as alleged in Cause of Action #3;
 - 6) Dong Lee knew that many people had previously been harmed by those material false representations and material nondisclosures; and
 - 7) Dong Lee could have reasonably foreseen that the Plaintiff was going to be harmed by such material false representations and material nondisclosures.
422. Dong Lee breached his fiduciary duties to the Plaintiff by making material false representations to the Plaintiff, as alleged in Cause of Action #1, and by not stopping those material false representations from being made by others under his supervision.
423. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated.
424. Dong Lee breached his fiduciary duties to the Plaintiff by concealing material information from the Plaintiff and by failing to disclose material information to the Plaintiff, as alleged in Cause of Action #2, and by not stopping that material information from being concealed by others under his supervision.
425. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated.

426. Dong Lee breached his fiduciary duties to the Plaintiff by making material false representations to the Plaintiff, as alleged in Cause of Action #3, and by not stopping those material false representations from being made by others under his supervision.
427. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into giving her email address and password to World Mission New Jersey, which she would not have otherwise done.
428. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
429. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she inadvertently gave her email address and password to World Mission New Jersey, which then used her email address and password to hack into her Internet accounts.
430. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
431. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
432. The Plaintiff's damages resulted from actions by Dong Lee which evidence a reckless disregard for the duties imposed by his position.

433. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
434. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
435. The acts and omissions of Dong Lee, as alleged herein, were willful or wanton.
436. The acts and omissions of Dong Lee, as alleged herein, were actuated by actual malice.
437. The acts and omissions of Dong Lee, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #7

CONSTRUCTIVE FRAUD

(Against Dong Lee)

438. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
439. Dong Lee owed fiduciary duties to the Plaintiff, arising out of the following facts:
- 1) Dong Lee knowingly undertook to act for the benefit of the Plaintiff, by promising spiritual guidance and establishing a clergy-parishioner relationship with the Plaintiff;
 - 2) in order for Dong Lee to provide such guidance to the Plaintiff, it was necessary for the Plaintiff to place her trust in him;
 - 3) Dong Lee knew that material false representations were being made to the Plaintiff, as alleged in Cause of Action #1;
 - 4) Dong Lee knew that material information was being concealed from the Plaintiff or left undisclosed to the Plaintiff, as alleged in Cause of Action #2;
 - 5) Dong Lee knew that material false representations were being made to the Plaintiff, as alleged in Cause of Action #3;
 - 6) Dong Lee knew that many people had previously been harmed by those material false representations and material nondisclosures; and
 - 7) Dong Lee could have reasonably foreseen that the Plaintiff was going to be harmed by such material false representations and material nondisclosures.
440. Dong Lee breached his fiduciary duties to the Plaintiff by making material false representations to the Plaintiff, as alleged in Cause of Action #1, and by not stopping those material false representations from being made by others under his supervision.

441. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated.
442. Dong Lee breached his fiduciary duties to the Plaintiff by concealing material information from the Plaintiff and by failing to disclose material information to the Plaintiff, as alleged in Cause of Action #2, and by not stopping that material information from being concealed by others under his supervision.
443. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated.
444. Dong Lee breached his fiduciary duties to the Plaintiff by making material false representations to the Plaintiff, as alleged in Cause of Action #3, and by not stopping those material false representations from being made by others under his supervision.
445. Dong Lee breached those fiduciary duties to the Plaintiff in order to induce the Plaintiff into giving her email address and password to World Mission New Jersey, which she would not have otherwise done.
446. Dong Lee's job performance is measured by the monetary donations and time commitments that he extracts from members of World Mission New Jersey. As such, Dong Lee received a benefit when he induced the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated.
447. Dong Lee's job performance is also measured by the degree to which he complies with the orders of Chang and Kim. On information and belief, Chang and Kim, or their agents, ordered Dong Lee to locate statements posted to the Internet by the Plaintiff

which were critical of World Mission. Because the Plaintiff posted her Internet statements anonymously, Dong Lee needed to hack into the Plaintiff's Internet accounts in order to comply with that order. Therefore, Dong Lee received a benefit when he induced the Plaintiff into giving her email address and password to World Mission New Jersey, which she would not have otherwise done, and which enabled Dong Lee or his agents to hack into the Plaintiff's Internet accounts so that he could locate the statements posted by the Plaintiff.

448. Therefore, Dong Lee's breach of fiduciary duties constitutes a constructive fraud.

449. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

450. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she inadvertently gave her email address and password to World Mission New Jersey, which then used her email address and password to hack into her Internet accounts.

451. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

452. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

453. The Plaintiff's damages resulted from actions by Dong Lee which evidence a reckless disregard for the duties imposed by his position.
454. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
455. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
456. The acts and omissions of Dong Lee, as alleged herein, were willful or wanton.
457. The acts and omissions of Dong Lee, as alleged herein, were actuated by actual malice.
458. The acts and omissions of Dong Lee, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #8

UNJUST ENRICHMENT

(Against World Mission South Korea and World Mission New Jersey)

459. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
460. World Mission South Korea and World Mission New Jersey each received a benefit from the Plaintiff, in the form of money, time and energy that the Plaintiff donated to World Mission New Jersey, with the fruits of such donations being passed on to World Mission South Korea.
461. The Plaintiff received no value in exchange for the money, time and energy that she donated to World Mission New Jersey.
462. World Mission South Korea and World Mission New Jersey each received additional benefits in the form of money, time and energy that was donated to World Mission New Jersey and other World Mission entities by other members who had been recruited into World Mission New Jersey by the Plaintiff, with the fruits of such donations being passed on to World Mission South Korea.
463. The Plaintiff was never compensated for the donations of money, time and energy that were given to World Mission New Jersey, or any other World Mission entity, as a result of the Plaintiff's efforts.
464. It is unjust to allow World Mission South Korea and World Mission New Jersey to retain those benefits at the expense of the Plaintiff, who has received no value in return.

465. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
466. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
467. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) restitution of all money donated to World Mission New Jersey by the Plaintiff;
- 2) compensation for all of the time and energy spent by the Plaintiff recruiting or fundraising for World Mission New Jersey;
- 3) commission-based compensation for all of the money donated to World Mission New Jersey or World Mission South Korea by other members whose membership or donations resulted from the efforts of the Plaintiff;
- 4) filing fees;
- 5) reasonable costs of suit;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #9

INVASION OF PRICACY / INTRUSION UPON SECLUSION

(Arising Out of Computer Hacking)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

468. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
469. The Defendants intruded upon the seclusion of the Plaintiff by undertaking the following actions:
- 1) setting up the Cult Watch Site in order to lure the Plaintiff into turning over her email address and password to World Mission New Jersey;
 - 2) using the Plaintiff's email address and password to hack into her other Internet accounts;
 - 3) obtaining through unauthorized access of the Plaintiff's Internet accounts the details of statements that she had posted anonymously; and
 - 4) disclosing the details of those anonymous statements to other people.
470. Each of those intrusions would be highly offensive to a reasonable person.
471. Therefore, the Defendants have invaded the Plaintiff's privacy.
472. As a direct and proximate result of the Defendants' invasion of the Plaintiff's privacy, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

473. As a direct and proximate result of the Defendants' invasion of the Plaintiff's privacy, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
474. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
475. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
476. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
477. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
478. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
479. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;

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

CAUSE OF ACTION #10

VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /

N.J.S.A. § 56:8-2

(Fraud In Connection with Sale of Merchandise Arising Out of False Representations)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

480. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

481. The Consumer Fraud Act, N.J.S.A. § 56:8-2 states in relevant part:

The act, use or employment by any person of any unconscionable commercial practice, deception, fraud, false pretense, false promise, misrepresentation, or the knowing, concealment, suppression, or omission of any material fact with intent that others rely upon such concealment, suppression or omission, in connection with the sale or advertisement of any merchandise or real estate, or with the subsequent performance of such person as aforesaid, whether or not any person has in fact been misled, deceived or damaged thereby, is declared to be an unlawful practice.

482. The Defendants view their "religion" as a form of "merchandise." In fact, in another lawsuit, World Mission New Jersey has brought product disparagement claims against the Plaintiff on the theory that the religious services offered by World Mission New Jersey constitute "products" which were disparaged when the Plaintiff criticized them.

See World Mission Society Church of God v. Colón, BER-L-5274-12 (N.J. Sup. Ct., Law Div., Bergen Cnty) (filed July 11, 2012).

483. The Defendants made material false representations to the Plaintiff in connection with World Mission New Jersey's fundraising (or the sale of its "merchandise"), as alleged in Cause of Action #1 above.
484. The Defendants made material false representations to the Plaintiff with the intent that the Plaintiff would rely on those false representations when deciding to donate money, time and energy to World Mission New Jersey.
485. The Defendants' false representations violate the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2.
486. As a direct and proximate result of Defendants' violations of the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2, Plaintiff suffered an ascertainable loss in the form of money, time and energy that she donated to World Mission New Jersey.
487. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
488. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
489. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it

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

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

491. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

492. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

493. The Plaintiff is therefore entitled to relief pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) treble damages pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19;
- 3) punitive damages in an amount to be determined at trial;
- 4) filing fees;
- 5) reasonable costs of suit;
- 6) reasonable attorney's fees;
- 7) reasonable pre-and post-judgment interest on all monetary awards; and
- 8) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #11

VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /

N.J.S.A. § 56:8-2

(Fraud In Connection with Sale of Merchandise Arising Out of Nondisclosures)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

494. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
495. As explained above, the Defendants view their "religion" as a form of "merchandise."
496. The Defendants failed to disclose material information to the Plaintiff in connection with World Mission New Jersey's fundraising (or the sale of its "merchandise"), as alleged in Cause of Action #2 above.
497. The Defendants failed to disclose material information, or concealed material information, with the intent that the Plaintiff would rely on those nondisclosures when deciding to donate money, time and energy to World Mission New Jersey.
498. The Defendants' nondisclosures violate the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2.
499. As a direct and proximate result of Defendants' violations of the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2, Plaintiff suffered an ascertainable loss in the form of money, time and energy that she donated to World Mission New Jersey.
500. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
501. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

502. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
503. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
504. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
505. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.
506. The Plaintiff is therefore entitled to relief pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) treble damages pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19;
- 3) punitive damages in an amount to be determined at trial;
- 4) filing fees;
- 5) reasonable costs of suit;
- 6) reasonable attorney's fees;
- 7) reasonable pre-and post-judgment interest on all monetary awards; and
- 8) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #12

VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /

N.J.S.A. § 56:8-2

(Unconscionable Commercial Practices In Connection with Sale of Merchandise)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

507. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
508. As explained above, the Defendants view their "religion" as a form of "merchandise."
509. Taken together, the actions and omissions of the Defendants as alleged in Causes of Action #1, #2, #3, and #4 above, constitute unconscionable commercial practices in connection with World Mission New Jersey's fundraising (or the sale of its "merchandise").
510. The Defendants' unconscionable practices violate the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2.
511. As a direct and proximate result of Defendants' violations of the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2, Plaintiff suffered an ascertainable loss in the form of money, time and energy that she donated to World Mission New Jersey.
512. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
513. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

514. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
515. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
516. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
517. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.
518. The Plaintiff is therefore entitled to relief pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) treble damages pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19;
- 3) punitive damages in an amount to be determined at trial;
- 4) filing fees;
- 5) reasonable costs of suit;
- 6) reasonable attorney's fees;
- 7) reasonable pre-and post-judgment interest on all monetary awards; and
- 8) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #13

VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /

N.J.S.A. § 56:8-2.7

(Fraud In Connection with Solicitation of Funds or Contributions)

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

519. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

520. The Consumer Fraud Act, N.J.S.A. § 56:8-2.7 states in relevant part:

It shall be an unlawful practice for any person to solicit funds or a contribution of any kind . . . where it has been falsely represented by such person or where the consumer has been falsely led to believe that such person is soliciting by or on behalf of any charitable or nonprofit organization

521. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis solicited funds from the Plaintiff.

522. In response to the Defendants' solicitations, the Plaintiff donated funds to World Mission New Jersey.

523. The Defendants falsely represented, and the Plaintiff was falsely led to believe, that such funds were being donated to, and used by, a charitable or nonprofit organization for charitable, nonprofit, or tax exempt purposes.

524. In fact, those funds were donated to the World Mission Enterprise, which is not a charitable enterprise, but which is rather a profitable venture which exists for non-tax exempt purposes.

525. Such conduct violates the Consumer Fraud Act, N.J.S.A. § 56:8-2.7

526. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis solicited the Plaintiff to donate time and energy to World Mission New Jersey.
527. In response to the Defendants' solicitations, the Plaintiff donated a significant amount of time and energy to World Mission New Jersey.
528. The Plaintiff's time and energy were used by World Mission New Jersey to raise additional funds from other members and to recruit new members.
529. The Defendants falsely represented, and the Plaintiff was falsely led to believe, that her time and energy were being used to raise money and recruit members into a charitable or nonprofit organization, which would use any money raised for charitable, nonprofit, or tax exempt purposes.
530. In fact, the Plaintiff's time and energy were used to raise money for and recruit members into the World Mission Enterprise, which is not a charitable enterprise, but which is rather a profitable venture which exists for non-tax exempt purposes.
531. Such conduct violates the Consumer Fraud Act, N.J.S.A. § 56:8-2.7
532. As a direct and proximate result of Defendants' violations of the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-2.7, Plaintiff suffered an ascertainable loss in the form of money, time, and energy that she donated to World Mission New Jersey.
533. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, which evidence a reckless disregard for the duties imposed by their respective positions.

534. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
535. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
536. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
537. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
538. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.
539. The Plaintiff is entitled to relief pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) treble damages pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-19;
- 3) punitive damages in an amount to be determined at trial;
- 4) filing fees;
- 5) reasonable costs of suit;
- 6) reasonable attorney's fees;

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

CAUSE OF ACTION #14

BIAS CRIMES / N.J.S.A. § 2A:53A-21

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

540. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
541. The Defendants, acting with a purpose to intimidate the Plaintiff because of her religion, her religious views, and her rejection of the Defendants' religion, undertook the following actions:
- 1) setting up the Cult Watch Site in order to lure the Plaintiff into turning over her email address and password to World Mission New Jersey;
 - 2) using the Plaintiff's email address and password to hack into her other Internet accounts;
 - 3) obtaining through unauthorized access of the Plaintiff's Internet accounts the details of statements that she had posted anonymously; and
 - 4) disclosing the details of those anonymous statements to other people.
542. Such conduct constitutes offenses under the following provisions of the New Jersey Code of Criminal Justice, Title 2C of the New Jersey Statutes:
- N.J.S.A. § 2C:20-25 (computer criminal activity); and
 - N.J.S.A. § 2C:20-31 (wrongful access, disclosure of information).

543. Therefore, the Defendants have committed bias crimes, in violation of N.J.S.A. § 2A:53A-21.
544. As a direct and proximate result of the bias crimes committed by the Defendants, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
545. As a direct and proximate result of the bias crimes committed by the Defendants, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
546. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
547. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
548. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
549. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

550. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

551. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #15

CIVIL CONSPIRACY

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

552. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

553. The Defendants each knowingly and willfully conspired among themselves to commit the wrongful, unlawful, and tortious acts alleged herein.

554. The Defendants have each committed overt acts or omissions in furtherance of the conspiracy, as alleged herein, and have each cooperated with, lent aid and encouragement

to, or ratified and adopted the acts of the other Defendants, in a manner at this time unknown to Plaintiff, but known to the Defendants and to each of them.

555. The Defendants have each, at various times as alleged herein, directly ordered, authorized, or participated in the wrongful, unlawful, and tortious conduct that was directed at the Plaintiff.

556. As a direct and proximate result of the Defendants' conspiratorial conduct, the Plaintiff was damaged, in that she donated money and time to World Mission New Jersey that she otherwise would not have donated.

557. As a direct and proximate result of the Defendants' conspiratorial conduct, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

558. As a direct and proximate result of the Defendants' conspiratorial conduct, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

559. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

560. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

561. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

563. The acts and omissions of the Defendants, as herein alleged, were actuated by actual malice.

564. The acts and omissions of the Defendants, as herein alleged, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Defendants World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each liable as co-conspirators for the torts committed by the other Defendants, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #16

CONCERT OF ACTION

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

565. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

566. The Defendants pursued a common plan to commit the acts and omissions alleged herein.

567. The Defendants actively participated in, aided, and encouraged the wrongful acts and omissions alleged herein.

568. The Defendants each ratified the wrongful acts and omissions as alleged herein.

569. The wrongful acts and omissions, as alleged herein, were done for the benefit of each of the Defendants, in that the money, time and energy donated by the Plaintiff inured to the benefit of World Mission South Korea, World Mission New Jersey, Chang, and Kim, and the job performances of Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are all measured by such donations.

570. Therefore, all of the Defendants should be liable for the torts committed by the other Defendants.

571. As a direct and proximate result of the Defendants' concerted action, the Plaintiff was damaged, in that she donated money and time to World Mission New Jersey that she otherwise would not have donated.

572. As a direct and proximate result of the Defendants' concerted action, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

573. As a direct and proximate result of the Defendants' concerted action, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
574. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
575. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
576. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
577. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
578. The acts and omissions of the Defendants, as herein alleged, were actuated by actual malice.
579. The acts and omissions of the Defendants, as herein alleged, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Defendants World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara

Whalen, Richard Whalen, Lozada, and Jun Lee are each liable for the torts committed by the other Defendants, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #17

JOINT AND SEVERAL LIABILITY

(Against World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

580. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
581. The acts and omissions of each Defendant contributed as a substantial factor proximately causing the Plaintiff's damages, as alleged herein.
582. Therefore, to the extent that the total injury or loss cannot be subdivided, each Defendant should be held jointly and severally liable for the torts committed by the other Defendants.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Defendants World Mission South Korea, World Mission New Jersey, Chang, Kim, Dong Lee, Bong Lee, Tara

Whalen, Richard Whalen, Lozada, and Jun Lee are each jointly and severally liable for the torts committed by the other Defendants, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #18

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

(Against World Mission South Korea for Acts and Omissions Committed by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

583. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

584. Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of World Mission South Korea.

585. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with World Mission South Korea.

586. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by World Mission South Korea.

587. The wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by World Mission South Korea.
588. The wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve World Mission South Korea.
589. World Mission South Korea received benefits from the wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff, which inured to the benefit of World Mission South Korea.
590. World Mission South Korea intended for Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
591. World Mission South Korea knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and it intended for the Plaintiff to suffer those injuries.
592. World Mission South Korea was reckless and failed to exercise reasonable care over Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
593. At all times relevant herein, World Mission South Korea retained control of the manner and means of the doing of the work that included the acts and omissions committed by

Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.

594. At all times relevant herein, World Mission South Korea failed to inspect or exercise proper oversight over the work performed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
595. The acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
596. The upper management of World Mission South Korea authorized, participated in, and ratified the acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
597. Therefore, World Mission South Korea is vicariously liable for the actions and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
598. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
599. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

600. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

602. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

603. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea is vicariously liable for all of the torts committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #19

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

(Against World Mission New Jersey for Acts and Omissions Committed by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

604. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
605. Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of World Mission New Jersey.
606. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with World Mission New Jersey.
607. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by World Mission New Jersey.
608. The wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by World Mission New Jersey.
609. The wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve World Mission New Jersey.
610. World Mission New Jersey received benefits from the wrongful acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff.

611. World Mission New Jersey intended for Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
612. World Mission New Jersey knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and it intended for the Plaintiff to suffer those injuries.
613. World Mission New Jersey was reckless and failed to exercise reasonable care over Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
614. At all times relevant herein, World Mission New Jersey retained control of the manner and means of the doing of the work that included the acts and omissions committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
615. At all times relevant herein, World Mission New Jersey failed to inspect or exercise proper oversight over the work performed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
616. The acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
617. The upper management of World Mission New Jersey authorized, participated in, and ratified the acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.

618. Therefore, World Mission New Jersey is vicariously liable for the actions and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
619. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
620. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
621. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
622. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
623. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
624. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey is vicariously liable for all of the torts committed by Defendants Kim Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #20

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Chang for Acts and Omissions Committed by
Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

625. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
626. Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of Chang.
627. At all times relevant herein, Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with Chang.

628. At all times relevant herein, Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by Chang.
629. The wrongful acts and omissions committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by Chang.
630. The wrongful acts and omissions committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve Chang.
631. Chang received benefits from the wrongful acts and omissions committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff, which, on information and belief, inured to the benefit of Chang.
632. Chang intended for Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
633. Chang knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and she intended for the Plaintiff to suffer those injuries.
634. Chang was reckless and failed to exercise reasonable care over Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.

635. At all times relevant herein, Chang retained control of the manner and means of the doing of the work that included the acts and omissions committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
636. At all times relevant herein, Chang failed to inspect or exercise proper oversight over the work performed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
637. The acts and omissions of Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
638. Chang authorized, participated in, and ratified the acts and omissions of Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
639. Therefore, Chang is vicariously liable for the actions and omissions of Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
640. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
641. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

642. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

644. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

645. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Chang is vicariously liable for all of the torts committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #21

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Kim for Acts and Omissions Committed by
Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

646. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
647. Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of Kim.
648. At all times relevant herein, Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with Kim.
649. At all times relevant herein, Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by Kim.
650. The wrongful acts and omissions committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by Kim.
651. The wrongful acts and omissions committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve Kim.
652. Kim received benefits from the wrongful acts and omissions committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff, which, on information and belief, inured to the benefit of Kim.

653. Kim intended for Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
654. Kim knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and he intended for the Plaintiff to suffer those injuries.
655. Kim was reckless and failed to exercise reasonable care over Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
656. At all times relevant herein, Kim retained control of the manner and means of the doing of the work that included the acts and omissions committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
657. At all times relevant herein, Kim failed to inspect or exercise proper oversight over the work performed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
658. The acts and omissions of Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
659. Kim authorized, participated in, and ratified the acts and omissions of Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
660. Therefore, Kim is vicariously liable for the actions and omissions of Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.

661. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
662. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
663. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
664. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
665. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
666. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Kim is vicariously liable for all of the torts committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;

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

CAUSE OF ACTION #22

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Dong Lee for Acts and Omissions Committed by
Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

667. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
668. Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of Dong Lee.
669. At all times relevant herein, Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with Dong Lee.
670. At all times relevant herein, Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by Dong Lee.
671. The wrongful acts and omissions committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by Dong Lee.

672. The wrongful acts and omissions committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve Dong Lee.
673. Dong Lee received benefits from the wrongful acts and omissions committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff, which was used to measure Dong Lee's job performance.
674. Dong Lee intended for Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
675. Dong Lee knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and he intended for the Plaintiff to suffer those injuries.
676. Dong Lee was reckless and failed to exercise reasonable care over Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
677. At all times relevant herein, Dong Lee retained control of the manner and means of the doing of the work that included the acts and omissions committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
678. At all times relevant herein, Dong Lee failed to inspect or exercise proper oversight over the work performed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
679. The acts and omissions of Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.

680. Dong Lee authorized, participated in, and ratified the acts and omissions of Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
681. Therefore, Dong Lee is vicariously liable for the actions and omissions of Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
682. The Plaintiff's damages resulted from actions by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
683. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
684. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
685. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
686. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

687. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Dong Lee is vicariously liable for all of the torts committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #23

VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Bong Lee for Acts and Omissions Committed by
Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

688. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

689. Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of Bong Lee.

with Bong Lee.

691. At all times relevant herein, Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by Bong Lee.
692. The wrongful acts and omissions committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were the same kind of acts and omissions that said Defendants were engaged or employed to perform by Bong Lee.
693. The wrongful acts and omissions committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were actuated in part by a purpose to serve Bong Lee.
694. Bong Lee received benefits from the wrongful acts and omissions committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, in the form of money, time and energy donated to World Mission New Jersey by the Plaintiff, which was used to measure Bong Lee's job performance.
695. Bong Lee intended for Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee to commit the acts and omissions alleged herein.
696. Bong Lee knew that many other people who had been members of World Mission had suffered the same or similar injuries as the Plaintiff, as alleged herein, and she intended for the Plaintiff to suffer those injuries.
697. Bong Lee was reckless and failed to exercise reasonable care over Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.

690. At all times relevant herein, Defendants Dong Lee, Tara Whalen, Richard Whalen,

698. At all times relevant herein, Bong Lee retained control of the manner and means of the doing of the work that included the acts and omissions committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
699. At all times relevant herein, Bong Lee failed to inspect or exercise proper oversight over the work performed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee.
700. The acts and omissions of Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
701. Bong Lee authorized, participated in, and ratified the acts and omissions of Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
702. Therefore, Bong Lee is vicariously liable for the actions and omissions of Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, by operation of law under the doctrine of respondeat superior, and is responsible for all of the damages attributed to Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein.
703. The Plaintiff's damages resulted from actions by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
704. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

705. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

707. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

708. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Bong Lee is vicariously liable for all of the torts committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #24

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

(Against World Mission South Korea for Acts and Omissions Committed by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

709. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
710. To the extent that Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with World Mission South Korea while committing the acts and omissions alleged herein, World Mission South Korea failed to exercise reasonable care to control Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though World Mission South Korea knew or should have known of its ability to control Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.
711. The acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
712. The upper management of World Mission South Korea authorized, participated in, and ratified the acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
713. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

714. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
715. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
716. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
717. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
718. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea is directly liable for all of the torts committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

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

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

CAUSE OF ACTION #25

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

(Against World Mission New Jersey for Acts and Omissions Committed by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)

719. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
720. To the extent that Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with World Mission New Jersey while committing the acts and omissions alleged herein, World Mission New Jersey failed to exercise reasonable care to control Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though World Mission New Jersey knew or should have known of its ability to control Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.
721. The acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
722. The upper management of World Mission New Jersey authorized, participated in, and ratified the acts and omissions of Defendants Chang, Kim, Dong Lee, Bong Lee, Tara

Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.

723. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

724. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

725. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

727. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

728. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey is directly liable for all of the torts committed by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #26

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Chang for Acts and Omissions Committed by
Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

729. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
730. To the extent that Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with Chang while committing the acts and omissions alleged herein, Chang failed to exercise reasonable care to control Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though Chang knew or should have known of her ability to control Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.

731. The acts and omissions of Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
732. Chang authorized, participated in, and ratified the acts and omissions of Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
733. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
734. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
735. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
736. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
737. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
738. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Chang is directly liable for all of the torts committed by Defendants Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #27

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Kim for Acts and Omissions Committed by
Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

739. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

740. To the extent that Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with Kim while committing the acts and omissions alleged herein, Kim failed to exercise reasonable care to control Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though Kim knew or should have known of his ability to control Defendants Chang,

Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.

741. The acts and omissions of Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.

742. Kim authorized, participated in, and ratified the acts and omissions of Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.

743. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

744. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

745. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

747. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

748. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Kim is directly liable for all of the torts committed by Defendants Chang, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #28

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Dong Lee for Acts and Omissions Committed by
Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

749. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

750. To the extent that Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with Dong Lee while committing the acts and omissions alleged herein, Dong Lee failed to exercise reasonable care to control Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun

Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though Dong Lee knew or should have known of his ability to control Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.

751. The acts and omissions of Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
752. Dong Lee authorized, participated in, and ratified the acts and omissions of Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
753. The Plaintiff's damages resulted from actions by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
754. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
755. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
756. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
757. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

758. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Dong Lee is directly liable for all of the torts committed by Defendants Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #29

DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS

**(Against Bong Lee for Acts and Omissions Committed by
Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee)**

759. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

760. To the extent that Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were acting outside the scope of their agency or employment with Bong Lee while committing the acts and omissions alleged herein, Bong Lee failed to exercise reasonable care to control Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun

Lee, so as to prevent them from intentionally harming the Plaintiff while they were on the premises of World Mission, even though Bong Lee knew or should have known of her ability to control Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, and of the necessity and opportunity for exercising such control.

761. The acts and omissions of Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, were especially egregious.
762. Bong Lee authorized, participated in, and ratified the acts and omissions of Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, or demonstrated willful indifference.
763. The Plaintiff's damages resulted from actions by Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
764. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
765. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
766. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
767. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

768. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Bong Lee is directly liable for all of the torts committed by Defendants Dong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #30

JOINT ENTERPRISE LIABILITY

(Against World Mission South Korea and World Mission New Jersey for Acts and Omissions Committed by Each Other and by Each Other's Employees or Agents)

769. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

770. World Mission South Korea and World Mission New Jersey are both members of the World Mission Enterprise.

771. As members of the World Mission Enterprise, World Mission South Korea and World Mission New Jersey have purposefully agreed to share profits and losses.

772. As a member of the World Mission Enterprise, World Mission South Korea has purposefully agreed to act as the "Head Office" and the "center" for World Mission New Jersey, and to provide World Mission New Jersey with administrative and management support, and other resources as needed.
773. As a member of the World Mission Enterprise, World Mission New Jersey has purposefully agreed to send all or most of its profits to World Mission South Korea.
774. As members of the World Mission Enterprise, World Mission South Korea and World Mission New Jersey jointly seek profits, without any actual partnership or corporate designation joining the corporations.
775. As members of the World Mission Enterprise, World Mission South Korea and World Mission New Jersey are each the agent and servant of the other.
776. All of the acts and omissions alleged herein were committed within the scope of the World Mission Enterprise.
777. Therefore, World Mission South Korea and World Mission New Jersey are each vicariously liable for the acts and omissions committed by each other, and by each other's employees or agents, as alleged herein.
778. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
779. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

780. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

782. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

783. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea and World Mission New Jersey are each vicariously liable for all of the torts committed by each other and by Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #31

PIERCING THE CORPORATE VEIL

**(Piercing the Veil of World Mission New Jersey to Attach
World Mission New Jersey's Liability to World Mission South Korea)**

784. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
785. World Mission South Korea is closely identified with the affairs of World Mission New Jersey.
786. World Mission South Korea and World Mission New Jersey are each alter egos of each other.
787. World Mission South Korea exercises pervasive control over World Mission New Jersey.
788. World Mission South Korea and World Mission New Jersey each substantially disregard each other's separate corporate nature.
789. On information and belief, the funds of World Mission South Korea and the funds of World Mission New Jersey are frequently comingled.
790. World Mission South Korea and World Mission New Jersey have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.
791. World Mission South Korea and World Mission New Jersey have a common ownership and common management, in that both are owned and managed by Chang and Kim.
792. World Mission South Korea and World Mission New Jersey both operate under the same name: World Mission Society Church of God.
793. On information and belief, World Mission South Korea and World Mission New Jersey have made impermissible transfers of money to each other.

794. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that World Mission South Korea and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
795. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that World Mission South Korea and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
796. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
797. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
798. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

799. World Mission South Korea and World Mission New Jersey are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
800. World Mission South Korea and World Mission New Jersey are using each other to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
801. World Mission South Korea and World Mission New Jersey are using each other to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
802. World Mission South Korea and World Mission New Jersey are using each other to evade the law.
803. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
804. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
805. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
806. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

807. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

808. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be pierced, and that World Mission South Korea shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #32

PIERCING THE CORPORATE VEIL

**(Piercing the Veil of World Mission New Jersey to Attach
World Mission New Jersey's Liability to Chang)**

809. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

810. Chang is closely identified with the affairs of World Mission New Jersey.

811. Chang and World Mission New Jersey are each alter egos of each other.
812. Chang exercises pervasive control over World Mission New Jersey.
813. Chang substantially disregards the separate nature of the World Mission New Jersey corporate entity.
814. Chang has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
815. On information and belief, World Mission New Jersey has made impermissible transfers of money to Chang, or to World Mission South Korea, where the money inures to Chang's benefit.
816. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
817. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
818. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

819. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
820. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
821. Chang is using World Mission New Jersey to defeat the ends of justice, by shielding herself from liability for the acts and omissions alleged herein.
822. Chang is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
823. Chang is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
824. Chang is using World Mission New Jersey to evade the law.
825. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
826. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it

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

827. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

829. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

830. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be pierced, and that Chang shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #33

PIERCING THE CORPORATE VEIL

**(Piercing the Veil of World Mission New Jersey to Attach
World Mission New Jersey's Liability to Kim)**

831. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
832. Kim is closely identified with the affairs of World Mission New Jersey.
833. Kim and World Mission New Jersey are each alter egos of each other.
834. Kim exercises pervasive control over World Mission New Jersey.
835. Kim substantially disregards the separate nature of the World Mission New Jersey corporate entity.
836. Kim has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
837. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
838. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
839. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she

donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

840. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
841. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
842. Kim is using World Mission New Jersey to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.
843. Kim is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
844. Kim is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
845. Kim is using World Mission New Jersey to evade the law.
846. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

847. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
848. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
849. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
850. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
851. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be pierced, and that Kim shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and

7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #34

PIERCING THE CORPORATE VEIL

**(Piercing the Veil of World Mission New Jersey to Attach
World Mission New Jersey's Liability to Dong Lee)**

852. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
853. Dong Lee is closely identified with the affairs of World Mission New Jersey.
854. Dong Lee and World Mission New Jersey are each alter egos of each other.
855. Dong Lee exercises pervasive control over World Mission New Jersey.
856. Dong Lee substantially disregards the separate nature of the World Mission New Jersey corporate entity.
857. Dong Lee has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
858. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Dong Lee and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
859. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Dong Lee and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.

860. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
861. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
862. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
863. Dong Lee is using World Mission New Jersey to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.
864. Dong Lee is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
865. Dong Lee is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
866. Dong Lee is using World Mission New Jersey to evade the law.

867. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
868. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
869. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
870. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
871. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
872. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be pierced, and that Dong Lee shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;

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

CAUSE OF ACTION #35

PIERCING THE CORPORATE VEIL

**(Piercing the Veil of World Mission New Jersey to Attach
World Mission New Jersey's Liability to Bong Lee)**

873. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
874. Bong Lee is closely identified with the affairs of World Mission New Jersey.
875. Bong Lee and World Mission New Jersey are each alter egos of each other.
876. Bong Lee exercises pervasive control over World Mission New Jersey.
877. Bong Lee substantially disregards the separate nature of the World Mission New Jersey corporate entity.
878. Bong Lee has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
879. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Bong Lee and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.

886. Bong Lee is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
887. Bong Lee is using World Mission New Jersey to evade the law.
888. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
889. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
890. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
891. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
892. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
893. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be pierced, and that Bong Lee shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #36

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Big Shine to Attach
World Mission New Jersey's Liability to Big Shine)**

894. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
895. Big Shine is closely identified with the affairs of World Mission New Jersey.
896. Big Shine and World Mission New Jersey are each alter egos of each other.
897. World Mission New Jersey exercises pervasive control over Big Shine.
898. Big Shine and World Mission New Jersey each substantially disregard each other's separate corporate nature.
899. On information and belief, the funds of Big Shine and the funds of World Mission New Jersey are frequently comingled.
900. Big Shine and World Mission New Jersey have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.

901. Big Shine and World Mission New Jersey have a common management, in that both are managed by Dong Lee and Bong Lee.
902. On information and belief, Big Shine and World Mission New Jersey have made impermissible transfers of money to each other.
903. On information and belief, Big Shine has used World Mission New Jersey's tax exempt number to purchase supplies and inventory, with World Mission New Jersey's knowledge and consent.
904. As a direct and proximate result of the close relationship between Big Shine and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Big Shine and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
905. As a direct and proximate result of the close relationship between Big Shine and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
906. As a direct and proximate result of the close relationship between Big Shine and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
907. As a direct and proximate result of the close relationship between Big Shine and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has

- incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
908. Big Shine and World Mission New Jersey are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
909. Big Shine and World Mission New Jersey are using each other to perpetrate a fraud, as alleged in Cause of Action #2.
910. World Mission New Jersey is using Big Shine to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
911. Big Shine and World Mission New Jersey are using each other to evade the law.
912. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
913. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
914. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
915. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
916. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

917. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that Big Shine shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #37

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Albright to Attach
World Mission New Jersey's Liability to Albright)**

918. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

919. Albright is closely identified with the affairs of World Mission New Jersey.

920. Albright and World Mission New Jersey are each alter egos of each other.

921. World Mission New Jersey exercises pervasive control over Albright.

922. Albright and World Mission New Jersey each substantially disregard each other's separate corporate nature.
923. Albright makes its employees or contractors available to World Mission New Jersey to perform construction work on the property of World Mission New Jersey.
924. On information and belief, the funds of Albright and the funds of World Mission New Jersey are frequently comingled.
925. Albright and World Mission New Jersey have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.
926. Albright and World Mission New Jersey have a common management, in that both are managed by Dong Lee, Tara Whalen, and Richard Whalen (notwithstanding the fact that Dong Lee has no official title with Albright).
927. On information and belief, Albright and World Mission New Jersey have made impermissible transfers of money to each other.
928. On information and belief, Albright has used World Mission New Jersey's tax-exempt number to purchase supplies and inventory, with World Mission New Jersey's knowledge and consent.
929. As a direct and proximate result of the close relationship between Albright and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Albright and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
930. As a direct and proximate result of the close relationship between Albright and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she

donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

931. As a direct and proximate result of the close relationship between Albright and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
932. As a direct and proximate result of the close relationship between Albright and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
933. Albright and World Mission New Jersey are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
934. Albright and World Mission New Jersey are using each other to perpetrate a fraud, as alleged in Cause of Action #2.
935. World Mission New Jersey is using Albright to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
936. Albright and World Mission New Jersey are using each other to evade the law.
937. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

938. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

939. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

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

941. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

942. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that Albright shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and

7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #38

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Lincoln Grill to Attach
World Mission New Jersey's Liability to Lincoln Grill)**

943. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
944. Lincoln Grill is closely identified with the affairs of World Mission New Jersey.
945. Lincoln Grill and World Mission New Jersey are each alter egos of each other.
946. World Mission New Jersey exercises pervasive control over Lincoln Grill.
947. Lincoln Grill and World Mission New Jersey each substantially disregard each other's separate corporate nature.
948. Lincoln Grill often provides food for World Mission New Jersey recruiting functions.
949. World Mission New Jersey uses Lincoln Grill as a meeting place for prospective recruits.
950. On information and belief, the funds of Lincoln Grill and the funds of World Mission New Jersey are frequently comingled.
951. Members of World Mission New Jersey are often told to donate money directly to Lincoln Grill, rather than to World Mission. In such cases, the donor is instructed to give the money directly to Bong Lee.
952. Lincoln Grill and World Mission New Jersey have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.

953. Lincoln Grill and World Mission New Jersey have a common management, in that both are managed by Dong Lee and Bong Lee.
954. On information and belief, Lincoln Grill and World Mission New Jersey have made impermissible transfers of money to each other.
955. On information and belief, Lincoln Grill has used World Mission New Jersey's tax exempt number to purchase supplies and inventory, with World Mission New Jersey's knowledge and consent.
956. As a direct and proximate result of the close relationship between Lincoln Grill and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Lincoln Grill and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
957. As a direct and proximate result of the close relationship between Lincoln Grill and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
958. As a direct and proximate result of the close relationship between Lincoln Grill and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
959. As a direct and proximate result of the close relationship between Lincoln Grill and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she

has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

960. Lincoln Grill and World Mission New Jersey are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
961. Lincoln Grill and World Mission New Jersey are using each other to perpetrate a fraud, as alleged in Cause of Action #2.
962. World Mission New Jersey is using Lincoln Grill to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
963. Lincoln Grill and World Mission New Jersey are using each other to evade the law.
964. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
965. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
966. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
967. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
968. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

969. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that Lincoln Grill shall be held liable for the torts committed by World Mission New Jersey, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #39

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission New Jersey to Attach
World Mission South Korea's Liability to World Mission New Jersey)**

970. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

971. World Mission South Korea is closely identified with the affairs of World Mission New Jersey.

1000. Chang has created serious ambiguity as to the manner and capacity in which World Mission South Korea and its representatives were acting when committing the actions and omissions alleged herein.
1001. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission South Korea worked together to make the false representations alleged in Causes of Action #1 and #3.
1002. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission South Korea worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1003. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1004. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1005. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she has

- incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1006. Chang is using World Mission South Korea to defeat the ends of justice, by shielding herself from liability for the acts and omissions alleged herein.
1007. Chang is using World Mission South Korea to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1008. Chang is using World Mission South Korea to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1009. Chang is using World Mission South Korea to evade the law.
1010. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1011. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1012. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1013. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1014. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1026. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1027. Kim is using World Mission South Korea to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.
1028. Kim is using World Mission South Korea to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1029. Chang is using World Mission South Korea to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1030. Kim is using World Mission South Korea to evade the law.
1031. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1032. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1033. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1034. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1035. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1036. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea's corporate veil shall be pierced, and that Kim shall be held liable for the torts committed by World Mission South Korea, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #42

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Big Shine to Attach
World Mission South Korea's Liability to Big Shine)**

1037. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

1038. Big Shine is closely identified with the affairs of World Mission South Korea.

1039. Big Shine and World Mission South Korea are each alter egos of each other.

1040. World Mission South Korea exercises pervasive control over Big Shine.
1041. Big Shine and World Mission South Korea each substantially disregard each other's separate corporate nature.
1042. Big Shine and World Mission South Korea share the same office space in South Korea, in the building which houses World Mission's global headquarters.
1043. On information and belief, the funds of Big Shine and the funds of World Mission South Korea are frequently comingled.
1044. Big Shine and World Mission South Korea have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.
1045. On information and belief, Big Shine and World Mission South Korea have made impermissible transfers of money to each other.
1046. As a direct and proximate result of the close relationship between Big Shine and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Big Shine and World Mission South Korea worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1047. As a direct and proximate result of the close relationship between Big Shine and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1048. As a direct and proximate result of the close relationship between Big Shine and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression,

nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

1049. As a direct and proximate result of the close relationship between Big Shine and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1050. Big Shine and World Mission South Korea are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
1051. Big Shine and World Mission South Korea are using each other to perpetrate a fraud, as alleged in Cause of Action #2.
1052. Big Shine and World Mission South Korea are using each other to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1053. Big Shine and World Mission South Korea are using each other to evade the law.
1054. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1055. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1056. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1057. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1058. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1059. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea's corporate veil shall be reverse-pierced, and that Big Shine shall be held liable for the torts committed by World Mission South Korea, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #43

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission New Jersey to Attach
Chang's Liability to World Mission New Jersey)**

1060. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1061. Chang is closely identified with the affairs of World Mission New Jersey.
1062. Chang and World Mission New Jersey are each alter egos of each other.
1063. Chang exercises pervasive control over World Mission New Jersey.
1064. Chang substantially disregards the separate nature of the World Mission New Jersey corporate entity.
1065. Chang has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
1066. On information and belief, World Mission New Jersey has made impermissible transfers of money to Chang.
1067. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
1068. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.

1069. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1070. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1071. As a direct and proximate result of the close relationship between Chang and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1072. Chang is using World Mission New Jersey to defeat the ends of justice, by shielding herself from liability for the acts and omissions alleged herein.
1073. Chang is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1074. Chang is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1075. Chang is using World Mission New Jersey to evade the law.

1076. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

1077. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1078. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1079. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1080. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1081. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that World Mission New Jersey shall be held liable for the torts committed by Chang, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;

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

CAUSE OF ACTION #44

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission New Jersey to Attach
Kim's Liability to World Mission New Jersey)**

1082. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1083. Kim is closely identified with the affairs of World Mission New Jersey.
1084. Kim and World Mission New Jersey are each alter egos of each other.
1085. Kim exercises pervasive control over World Mission New Jersey.
1086. Kim substantially disregards the separate nature of the World Mission New Jersey corporate entity.
1087. Kim has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
1088. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.

1089. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1090. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1091. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1092. As a direct and proximate result of the close relationship between Kim and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1093. Kim is using World Mission New Jersey to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.
1094. Kim is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.

1095. Kim is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1096. Kim is using World Mission New Jersey to evade the law.
1097. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1098. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1099. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1100. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1101. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
1102. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that World Mission New Jersey shall be held liable for the torts committed by Kim, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #45

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission New Jersey to Attach
Dong Lee's Liability to World Mission New Jersey)**

1103. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1104. Dong Lee is closely identified with the affairs of World Mission New Jersey.
1105. Dong Lee and World Mission New Jersey are each alter egos of each other.
1106. Dong Lee exercises pervasive control over World Mission New Jersey.
1107. Dong Lee substantially disregards the separate nature of the World Mission New Jersey corporate entity.
1108. Dong Lee has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
1109. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that

Dong Lee and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.

1110. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Dong Lee and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1111. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1112. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1113. As a direct and proximate result of the close relationship between Dong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1114. Dong Lee is using World Mission New Jersey to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.

1115. Dong Lee is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1116. Dong Lee is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1117. Dong Lee is using World Mission New Jersey to evade the law.
1118. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1119. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1120. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1121. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1122. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
1123. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission New Jersey's corporate veil shall be reverse-pierced, and that World Mission New Jersey shall be held liable for the torts committed by Dong Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #46

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission New Jersey to Attach
Bong Lee's Liability to World Mission New Jersey)**

1124. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1125. Bong Lee is closely identified with the affairs of World Mission New Jersey.
1126. Bong Lee and World Mission New Jersey are each alter egos of each other.
1127. Bong Lee exercises pervasive control over World Mission New Jersey.
1128. Bong Lee substantially disregards the separate nature of the World Mission New Jersey corporate entity.

1164. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1165. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea's corporate veil shall be reverse-pierced, and that World Mission South Korea shall be held liable for the torts committed by Chang, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #48

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of World Mission South Korea to Attach
Kim's Liability to World Mission South Korea)**

1166. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

1167. Kim is closely identified with the affairs of World Mission South Korea.

1168. Kim and World Mission South Korea are each alter egos of each other.
1169. Kim exercises pervasive control over World Mission South Korea.
1170. Kim substantially disregards the separate nature of the World Mission South Korea corporate entity.
1171. Kim has created serious ambiguity as to the manner and capacity in which World Mission South Korea and its representatives were acting when committing the actions and omissions alleged herein.
1172. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission South Korea worked together to make the false representations alleged in Causes of Action #1 and #3.
1173. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission South Korea worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1174. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1175. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification,

- embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1176. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1177. Kim is using World Mission South Korea to defeat the ends of justice, by shielding himself from liability for the acts and omissions alleged herein.
1178. Kim is using World Mission South Korea to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1179. Kim is using World Mission South Korea to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1180. Kim is using World Mission South Korea to evade the law.
1181. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1182. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1183. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it

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

1184. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1185. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1186. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that World Mission South Korea's corporate veil shall be reverse-pierced, and that World Mission South Korea shall be held liable for the torts committed by Kim, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #49

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Big Shine to Attach
Liability of Chang, Kim, Dong Lee, Bong Lee, and Jun Lee to Big Shine)**

1187. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1188. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are all closely identified with the affairs of Big Shine.
1189. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are each alter egos of Big Shine.
1190. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee each exercise pervasive control over Big Shine.
1191. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee each substantially disregard the separate nature of the Big Shine corporate entity.
1192. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee have each created serious ambiguity as to the manner and capacity in which they and Big Shine were acting when they committed the actions and omissions alleged herein.
1193. As a direct and proximate result of the close relationship between Chang, Kim, Dong Lee, Bong Lee, Jun Lee, and Big Shine, the Plaintiff has suffered from fraudulent consequences, in that Chang, Kim, Dong Lee, Bong Lee, Jun Lee, and Big Shine worked together to misrepresent and conceal the true nature of the World Mission Enterprise, as alleged in Cause of Action #2.
1194. As a direct and proximate result of the close relationship between Chang, Kim, Dong Lee, Bong Lee, Jun Lee, and Big Shine, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

1195. As a direct and proximate result of the close relationship between Chang, Kim, Dong Lee, Bong Lee, Jun Lee, and Big Shine, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1196. As a direct and proximate result of the close relationship between Chang, Kim, Dong Lee, Bong Lee, Jun Lee, and Big Shine, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1197. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are using Big Shine to defeat the ends of justice, by shielding themselves from liability for the acts and omissions alleged herein.
1198. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are using Big Shine to perpetrate a fraud, as alleged in Cause of Action #2.
1199. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are using Big Shine to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1200. Chang, Kim, Dong Lee, Bong Lee, and Jun Lee are using Big Shine to evade the law.
1201. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1202. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it

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

1203. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1204. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1205. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1206. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Big Shine's corporate veil shall be reverse-pierced, and that Big Shine shall be held liable for the torts committed by Chang, Kim, Dong Lee, Bong Lee, and Jun Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and
- 7) such other and further relief which this Court may determine to be just and equitable.

CAUSE OF ACTION #50

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Albright to Attach
Liability of Dong Lee, Tara Whalen, and Richard Whalen to Albright)**

1207. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1208. Dong Lee, Tara Whalen, and Richard Whalen are all closely identified with the affairs of Albright.
1209. Dong Lee, Tara Whalen, and Richard Whalen are each alter egos of Albright.
1210. Dong Lee, Tara Whalen, and Richard Whalen each exercise pervasive control over Albright.
1211. Dong Lee, Tara Whalen, and Richard Whalen each substantially disregard the separate nature of the Albright corporate entity.
1212. Dong Lee, Tara Whalen, and Richard Whalen have each created serious ambiguity as to the manner and capacity in which they and Albright were acting when they committed the actions and omissions alleged herein.
1213. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered from fraudulent consequences, in that Dong Lee, Tara Whalen, Richard Whalen, and Albright worked together to misrepresent and conceal the true nature of the World Mission Enterprise, as alleged in Cause of Action #2.
1214. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered injurious consequences,

- in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1215. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1216. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1217. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to defeat the ends of justice, by shielding themselves from liability for the acts and omissions alleged herein.
1218. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to perpetrate a fraud, as alleged in Cause of Action #2.
1219. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1220. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to evade the law.
1221. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

1222. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1223. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1224. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1225. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
1226. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Albright's corporate veil shall be reverse-pierced, and that Albright shall be held liable for the torts committed by Dong Lee, Tara Whalen, and Richard Whalen, as alleged herein, and that judgment be entered for:

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

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

CAUSE OF ACTION #51

REVERSE-PIERCING THE CORPORATE VEIL

**(Reverse-Piercing the Veil of Lincoln Grill to Attach
Liability of Dong Lee and Bong Lee to Lincoln Grill)**

1227. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
1228. Dong Lee and Bong Lee are both closely identified with the affairs of Lincoln Grill.
1229. Dong Lee and Bong Lee are each alter egos of Lincoln Grill.
1230. Dong Lee and Bong Lee each exercise pervasive control over Lincoln Grill.
1231. Dong Lee and Bong Lee each substantially disregard the separate nature of the Lincoln Grill corporate entity.
1232. Dong Lee and Bong Lee have each created serious ambiguity as to the manner and capacity in which they and Lincoln Grill were acting when they committed the actions and omissions alleged herein.
1233. As a direct and proximate result of the close relationship between Dong Lee, Bong Lee, and Lincoln Grill, the Plaintiff has suffered from fraudulent consequences, in that Dong Lee, Bong Lee, and Lincoln Grill worked together to misrepresent and conceal the true nature of the World Mission Enterprise, as alleged in Cause of Action #2.
1234. As a direct and proximate result of the close relationship between Dong Lee, Bong Lee, and Lincoln Grill, the Plaintiff has suffered injurious consequences, in that she donated

money, time and energy to World Mission New Jersey that she would not have otherwise donated.

1235. As a direct and proximate result of the close relationship between Dong Lee, Bong Lee, and Lincoln Grill, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1236. As a direct and proximate result of the close relationship between Dong Lee, Bong Lee, and Lincoln Grill, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1237. Dong Lee and Bong Lee are using Lincoln Grill to defeat the ends of justice, by shielding themselves from liability for the acts and omissions alleged herein.
1238. Dong Lee and Bong Lee are using Lincoln Grill to perpetrate a fraud, as alleged in Cause of Action #2.
1239. Dong Lee and Bong Lee are using Lincoln Grill to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1240. Dong Lee and Bong Lee are using Lincoln Grill to evade the law.
1241. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

1242. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1243. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1244. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1245. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1246. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

WHEREFORE, the Plaintiff demands that an Order be issued declaring that Lincoln Grill's corporate veil shall be reverse-pierced, and that Lincoln Grill shall be held liable for the torts committed by Dong Lee and Bong Lee, as alleged herein, and that judgment be entered for:

- 1) compensatory damages in an amount to be determined at trial;
- 2) punitive damages in an amount to be determined at trial;
- 3) filing fees;
- 4) reasonable costs of suit;
- 5) reasonable attorney's fees;
- 6) reasonable pre-and post-judgment interest on all monetary awards; and.

7) such other and further relief which this Court may determine to be just and equitable.

TRIAL COUNSEL DESIGNATION

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

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

CERTIFICATION

I hereby certify pursuant to Rule 4:5-1 that to the best of my knowledge, information and belief, the controversy that is the subject of this lawsuit is not the subject of any other action pending in any other Court, nor is it the subject of any pending arbitration proceeding. No such other action or arbitration proceeding is currently contemplated. I further certify at this time that there are no other known parties who should be joined in the instant action. Nevertheless, there is another case involving two of the same parties, the Plaintiff and World Mission New Jersey, currently pending in this same court, Docket No. BER-L-5274-12. In that case, World Mission New Jersey is suing the Plaintiff for defamation and related claims arising primarily out of statements the Plaintiff allegedly posted to the Internet. Although some of the issues in that case overlap with issues in the instant case, the causes of action in the two cases are separate and distinct, and need not be tried together.

Dated: April 19, 2013

By:


PAUL S. GROSSWALD

Attorney for Plaintiff,
Michele Colón

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,)
)
Plaintiff,)
)
vs.)
)
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 why they're a part of the case. As far as whether
2 strategically they would be better brought in the
3 matrimonial action, I -- I don't know.

4 THE COURT: Your client is the World Mission
5 Society Church of God congregation in Ridgewood; correct?

6 MR. SANTORI: Correct Your Honor.

7 THE COURT: Okay. That was another question I
8 had. All right. They call themselves World Mission
9 Society Church of God, that's their legal name entity?

10 MR. SANTORI: I can follow-up on the -- on the
11 incorporated entity name if -- if you'd like, I don't have
12 that in front of me right now.

13 THE COURT: Okay, cause I -- I was perplexed are
14 you bringing this on behalf of the million members of the
15 World Mission Society Church of God throughout the world
16 or just Ridgewood?

17 MR. SANTORI: Ridgewood Your Honor.

18 THE COURT: Just Ridgewood.

19 MR. SANTORI: Yes.

20 THE COURT: Okay.

21 MS. ZBOROVSKY: If I may Your Honor.

22 THE COURT: Uh-hum.

23 MS. ZBOROVSKY: Because on the earlier point
24 with regard to the discussion about whether to bring in
25 Matrimonial Court and if that venue would more

) SUPERIOR COURT OF NEW JERSEY
WORLD MISSION SOCIETY)) LAW DIVISION: BERGEN COUNTY
CHURCH OF GOD)) DOCKET NO. BER-L-5274-12
Plaintiff,))
)	<u>Civil Action</u>
v.))
))
MICHELE COLÓN,))
))
Defendant.))
))

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS THE COMPLAINT IN LIEU OF ANSWER AND MOTION TO
STRIKE**

PAUL S. GROSSWALD, ESQ., LLC
140 Prospect Avenue, Suite 8S
Hackensack, NJ 07601
(917) 753-7007

Counsel for Defendant,
Michele Colón

On the Brief:
Paul S. Grosswald

In summary, Ms. Colón respectfully requests that this Court dismiss with prejudice all defamation claims arising out of the statements referenced in the following paragraphs of the Complaint: ¶¶ 41, 42, 44, 48, 49, 50, 56, 57, 58, 59, 60, 61, 62, 63, 102, and 105 - 121.

Furthermore, Ms. Colón respectfully requests that this Court dismiss without prejudice all defamation claims arising out of all of the remaining challenged statements in the Complaint, except for the statements referenced in ¶¶ 22, 23, 24, 27, 28, for which the dates have been sufficiently plead.

III. Claims for Statements Which Were Made During Court Testimony Must Be Dismissed

There are two Paragraphs in the Complaint which refer to statements allegedly made while Ms. Colón was testifying in a child-custody trial in New York, on June 27, 2012. (Compl. ¶¶ 27-28.) The mother in the child-custody trial was a member of the Plaintiff church. (Colón Aff. ¶ 5.) The father, however, had many concerns about the Plaintiff and its abusive behavior towards its members, especially with respect to the treatment of children. (Id. at ¶ 6.) The father did not believe that it would be in the best interests of his child to be raised in the custody of a member of the Plaintiff church. (Id. at ¶ 7.) Therefore, Ms. Colón was asked to testify to what she witnessed as a member of the Plaintiff, with respect to the way in which the Plaintiff treated children. (Id. at ¶ 8.) Ms. Colón is alleged to have testified that the Plaintiff forces mothers to give their children wine, forces mothers to have their children fast, and keeps children in a room all day, and refuses to let them leave.⁴ (Compl. ¶¶ 28(a)-28(c).) Ms. Colón is also alleged to

⁴ Ms. Colón maintains that the description of her testimony presented in the Complaint does not accurately reflect her actual testimony. Nevertheless, the Court may assume, for purposes of this Motion only, that the Plaintiff's description of Ms. Colón's testimony is accurate - but her testimony is still not actionable.

have testified that the Plaintiff destroyed her marriage. (Id. at ¶ 28(d).)

Under New York law, a witness testifying in a judicial proceeding is covered by an absolute privilege, which grants the witness immunity from liability in a defamation suit arising out of statements made during the witness' testimony. "The absolute protection afforded such individuals is designed to ensure that their own personal interests - - especially fear of a civil action, whether successful or otherwise - - do not have an adverse impact upon the discharge of their public function." Toker v. Pollak, 44 N.Y.2d 211, 219 (1978); see also Restatement (First) of Torts § 588 (1938) ("A witness is absolutely privileged to publish false and defamatory matter of another in communications preliminary to a proposed judicial proceeding and as a part of a judicial proceeding in which [s]he is testifying, if it has some relation thereto.") "[T]he privilege embraces anything that may possibly be pertinent." Martirano v. Frost, 25 N.Y.2d 505, 507 (1969). Therefore, "a statement, made in open court in the course of a judicial proceeding, is absolutely privileged if, by any view or under any circumstances, it may be considered pertinent to the litigation." Id.

There is no question that Ms. Colón's statements about the treatment of children by the Plaintiff, given during a child-custody trial in which one of the parents was a member of the Plaintiff, were pertinent to the litigation. Therefore, those statements are not actionable, and the Plaintiff's claims arising out of those statements must be dismissed.

IV. Claims for Statements Made By People Other Than Ms. Colón Must Be Dismissed

One of the alleged statements in the Complaint is alleged to have been made not by Ms. Colón, but rather by another critic of the Plaintiff, Tyler Newton. According to the Complaint, Mr. Newton "published the false and defamatory statement that Plaintiff 'totally ha[s] to be

Such an allegation is utterly frivolous. The Plaintiff alleges that most of Ms. Colón's statements have been made online. The Plaintiff does not allege that Ms. Colón has ever contacted any member of the Plaintiff at work or in public. Ms. Colón herself has stated in her affidavit that she has not contacted any member of the Plaintiff without that member's consent. (Colón Aff., ¶ 25.) The fact that the Plaintiff does not provide any specific facts to support this harassment allegation, and the fact that the Plaintiff has not included any claims for harassment in its Complaint, suggests that the Plaintiff is very much aware of the fact that Ms. Colón has not engaged in any such harassment. Nevertheless, the above allegation was included in the Complaint for the sole purpose of scandalizing Ms. Colón, and subjecting her to abuse. In the absence of any specific alleged facts that show that Ms. Colón has ever harassed any of the Plaintiff's members, ¶ 20 of the Complaint should be stricken.

CONCLUSION

For all of the foregoing reasons, Ms. Colón respectfully requests that this Court grant her Motion to Dismiss and Strike.

PAUL S. GROSSWALD, ESQ., LLC
Attorney for Defendant
Michele Colón

Dated: August 24, 2012

By: Paul Grosswald
PAUL S. GROSSWALD

Ms. Colón again respectfully requests that this Court recognize this lawsuit for what it is — an illegal and frivolous SLAPP suit — and grant Ms. Colón's Motion to Dismiss and Motion to Strike for the reasons described below. Ms. Colón further requests that this Court find that the filing of this lawsuit was frivolous, and that this Court grant Ms. Colón leave to file a motion for sanctions.

ARGUMENTS IN SUPPORT OF MOTION TO DISMISS

I. The Plaintiff's Complaint Should Be Dismissed Because the Plaintiff Has Used Its Legal Filings to Intimidate Witnesses and Ms. Colón Can No Longer Be Assured of Receiving a Fair Trial

In ¶ 27 and ¶ 28 of the Plaintiff's Original Complaint, the Plaintiff accused Ms. Colón of making defamatory statements during court testimony. Ms. Colón testified in a child-custody hearing. The mother was a member of the Plaintiff and the father was not. Ms. Colón testified on behalf of the father. Her testimony included a description of the Plaintiff's treatment of children.

The Plaintiff's attempt to sue Ms. Colón for that testimony was unlawful, and was probably a crime. As Ms. Colón explained in her initial brief on Pages 10 - 11, such testimony is covered by the litigation privilege and is therefore non-actionable. Suing a person for activity that is non-actionable is a prima facie violation of New Jersey's frivolous litigation statutes. See R. 1:4-8; N.J.S.A. 2A:15-59.1. Lawyers have been sanctioned in the past for attempting to sue witnesses for defamation arising out of witness testimony. See, e.g., Gooch v. Choice Entertaining Corp., 355 N.J. Super. 14, 20 (App. Div. 2002) ("His pursuit of the defamation claim in the face of the absolute immunity warrants . . . the imposition of sanctions under the frivolous litigation statute.") Moreover, the New Jersey Code of Criminal Justice explicitly prohibits retaliation against a witness:

2C:28-5. Tampering with witnesses and informants; retaliation against them.

b. Retaliation against witness or informant. A person commits an offense if he harms another by an unlawful act with purpose to retaliate for or on account of the service of another as a witness or informant. The offense is a crime of the second degree if the actor employs force or threat of force. Otherwise it is a crime of the third degree.

Because frivolous claims are unlawful, and because Ms. Colón was harmed by having to defend against the frivolous claim, and because the purpose of the claim was to retaliate against Ms. Colón for her testimony, it would appear that all of the elements of that crime have been established.

The Plaintiff's response has only compounded the problem. The Plaintiff is now denying that it ever complained that Ms. Colón's testimony was defamatory:

Defendant Colón not only made false allegations on the internet, statements at public hearings, but also in court, during a child-custody battle. Though these statements were salacious and malicious, they are not complained-of as defamatory in the Complaint.

(Pl.'s Br., p. 30.) This is one of quite a few false statements that the Plaintiff has inserted into its brief. The veracity of that assertion can be tested fairly easily by reviewing the manner in which the Plaintiff introduced the issue in ¶ 27 of its Original Complaint:

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

After listing some of Ms. Colón's alleged testimony in ¶ 28, the Complaint transitioned to a new topic in ¶ 29 this way: "Beyond these instances of public defamation" In other words, the Original Complaint presented Ms. Colón's testimony in ¶ 28, and described it as defamatory in

both the preceding and subsequent paragraphs. The Plaintiff was clearly attempting to bring a defamation claim arising out of Ms. Colón's testimony. It is only now, with the realization that it will be sanctioned if it pursues this claim any further, that the Plaintiff is pretending that it never intended for Ms. Colón's testimony to be litigated in the instant case.

As if denying what the Plaintiff had done was not bad enough, the Plaintiff has gone even further. The Plaintiff has attempted to put forth a justification for its tactic of intimidating witnesses who testify against it. The Plaintiff claims that the inclusion of the testimonial allegations was justified because it "describes a far-reaching campaign on the part of Ms. Colón to defame and destroy Plaintiff World Mission." (Pl.'s Br., p. 30.) This is an unacceptable strategy. The Plaintiff knows that it cannot sue Ms. Colón for her testimony. So instead the Plaintiff is attempting to lump her testimony into a larger category, which the Plaintiff defines as Ms. Colón's "campaign." The Plaintiff is now suing for Ms. Colón's "campaign" instead of suing for Ms. Colón's testimony. Yet, if the Plaintiff were to recover damages arising out of that "campaign," and Ms. Colón's testimony were to be included in that campaign, then the damages recovered would, in part, be damages arising out of Ms. Colón's testimony. In effect, the Plaintiff is attempting to do an end run around the witness immunity rule.

Such a strategy undermines the very purpose of the rule. "The absolute protection afforded [testifying] individuals is designed to ensure that their own personal interests — especially fear of a civil action, whether successful or otherwise — do not have an adverse impact upon the discharge of their public function." Toker v. Pollak, 44 N.Y.2d 211, 219 (1978). In other words, witnesses need to know that they can testify safely, and without fear of being sued. If a testifying witness could be sued simply by having their testimony characterized as being part of a broader "campaign," then the privilege would be eviscerated.

Such a strategy amounts to an attempt at witness intimidation. The Plaintiff had only two purposes for including ¶ 27 and ¶ 28 in the Complaint. The first was to deter Ms. Colón from testifying against the Plaintiff in any other forum. The second was to send a message to anyone else who may be thinking of testifying against the Plaintiff (including potential witnesses in the instant case) that they had better think twice. The inclusion of ¶ 27 and ¶ 28 in the Complaint, and the Plaintiff's subsequent attempt at rationalizing them, proves what Ms. Colón has been saying all along — the instant case is a SLAPP suit, and it was filed to intimidate the Plaintiff's critics, not with the expectation of prevailing on the merits.

Moreover, if the Plaintiff truly believed that Ms. Colón had lied on the witness stand, then it could have contacted the appropriate district attorney's office and filed a perjury complaint. Of course, if the Plaintiff had done that, then the district attorney would have necessarily needed to investigate the Plaintiff's treatment of children in order to determine if Ms. Colón was actually lying or not. It is no surprise that the Plaintiff chose not to pursue that route. Instead, the Plaintiff accused Ms. Colón of lying on the witness stand in the context of a civil suit, where the Plaintiff could simply amend the Complaint and drop the allegation after having sent its message of intimidation to Ms. Colón and any other future witnesses who may be antagonistic to the Plaintiff.

Although the Plaintiff has dropped the testimonial claims from its Proposed First Amended Complaint, the damage has already been done. Amending the complaint does not solve the problem. The Plaintiff has already let it be known that if a witness comes forward to testify against it, they will be sued. The Plaintiff has further let it be known that it will attempt to circumvent the witness immunity rule by lumping witness testimony into a broader category

of activities that are not covered by the immunity rule. The Plaintiff has also let it be known that if anyone tries to hold it accountable for doing these things, it will lie, and deny doing them.

Now that the word is out that the Plaintiff is willing to do these things, Ms. Colón is in the unenviable position of trying to recruit witnesses to help support her case - from a pool of potential witnesses who have now been implicitly threatened by the Plaintiff. Any witness who agrees to cooperate with her is likely to ask for information about the case. Prospective witnesses will want to see the Complaint, and any substantive motion papers that flesh out the litigant's positions. As soon as a prospective witness sees those papers, they will see exactly what the Plaintiff wants them to see — that the Plaintiff neither believes in nor respects the witness immunity rule, and will do what it can to sue the person who testifies against it. Witnesses are not likely to want to cooperate with Ms. Colón after seeing that.

It can now be expected that Ms. Colón is going to have difficulty recruiting cooperating witnesses to assist with her case. Ms. Colón may never even be aware of the extent that the Plaintiff's intimidation is undermining her case. Witnesses who learn of this case and who possess relevant information may simply decide to not come forward, without Ms. Colón or her counsel ever becoming aware that such a witness existed. The result is that Ms. Colón can no longer be assured that she is going to receive a fair trial if this litigation is allowed to continue.

The witness intimidation inflicted by the Plaintiff was not done by accident. All of the Plaintiff's lawyers have been competent and experienced. Mr. Dozier¹ and Mr. Miltenberg both came into this case as specialists in defamation law. They both necessarily had to know about the witness immunity rule. See Gooch, 355 N.J. Super. at 20 (holding that lawyer, "as an

officer of the court, knew, or should have known, the law regarding immunity"). Nevertheless, Mr. Dozier included the testimonial claims in the Original Complaint. Mr. Miltenberg admitted that the inclusion of those testimonial paragraphs was deliberate (not an oversight) and he attempted to justify that decision as a strategic choice. (Pl.'s Br., p. 30.) The Plaintiff and its attorneys should be required to bear full responsibility for their unlawful efforts to intimidate witnesses.

Because Ms. Colón's right to a fair trial has been severely compromised, Ms. Colón respectfully requests that this Court:

- 1) make a finding that:
 - a. the inclusion of ¶ 27 and ¶ 28 in the Original Complaint; and
 - b. the Plaintiff's subsequent denial that it was attempting to sue Ms. Colón for her testimony (Pl.'s Br., p. 30); and
 - c. the Plaintiff's attempt to justify the inclusion of ¶ 27 and ¶ 28 in the Original Complaint as a strategy that consisted of grouping Ms. Colón's non-actionable testimony into a broader category of allegedly actionable activity (id.);

were all done in bad faith, solely for the purpose of harassment, delay or malicious injury; and

- 2) make a finding that the Plaintiff and its attorneys knew, or should have known, that the above actions were without any reasonable basis in law or equity and could not be supported by a good faith argument for an extension, modification or reversal of existing law; and
- 3) make a finding that such actions were frivolous; and
- 4) dismiss all of the Plaintiff's claims, with prejudice.

¹ Mr. Dozier died before ever being admitted pro hac vice, so he was never an attorney of record in this case. Nevertheless, the Plaintiff has represented that Mr. Dozier was primarily responsible for the contents of the Original Complaint.

reasoning presented in Ms. Colón's initial brief on Pages 58 - 59, and grant the motion to strike ¶ 18.

II. Allegations Implying That Ms. Colón Has Harassed Members of the Plaintiff Are Impertinent, Immaterial and Scandalous and Must Be Stricken

Because the Plaintiff has agreed that ¶ 20 of its Complaint "makes no difference" to its Complaint (Pl.'s Br., p. 35), and has agreed to withdraw the language contained therein (*id.*), Ms. Colón respectfully requests that this Court grant Ms. Colón's motion to strike ¶ 20.

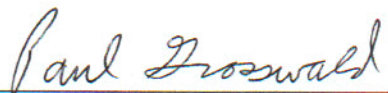
CONCLUSION

For all of the foregoing reasons, Ms. Colón respectfully requests that this Court grant her Motion to Dismiss and Strike, with prejudice. Ms. Colón further requests that this Court find that the filing of the instant lawsuit was frivolous, and that this Court grant leave to Ms. Colón to file a motion for sanctions.

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

Dated: December 3, 2012

By:


PAUL S. GROSSWALD

are entitled to sanctions. If the Presidential Volunteer Service Award Article claims are not dismissed, the Defendants respectfully request that this Court place the Plaintiffs and their lawyers on notice that they will be severely sanctioned when the facts ultimately prove that the challenged statements in the Presidential Volunteer Service Award Article are true.

XII. Plaintiff World Mission's Claims Should Be Dismissed As a Sanction for Intimidating Witnesses and Denying the Defendants a Fair Trial

In Ms. Colón's previous motion to dismiss, she argued that Plaintiff World Mission's witness intimidation tactics - specifically, Plaintiff World Mission's attempt to sue Ms. Colón for testifying in a child custody hearing in which Plaintiff World Mission's treatment of children was an issue - jeopardized Ms. Colón's right to a fair trial, thereby warranting dismissal of Plaintiff World Mission's case. Ms. Colón hereby repeats and incorporates by reference the arguments made in the December 3rd Brief, pages 5 - 10, as if set forth fully herein. Mr. Newton hereby joins in those arguments. Because the Defendants' right to a fair trial has been severely compromised, the Defendants respectfully request that this Court find that Plaintiff World Mission's attempt to sue for Ms. Colón's testimony was frivolous and sanctionable, and that the appropriate sanction should include dismissal of Plaintiff World Mission's claims.

ARGUMENTS FOR MOTION TO STRIKE

"On the court's or a party's motion, the court may either (1) dismiss any pleading that is, overall, scandalous, impertinent, or, considering the nature of the cause of action, abusive of the court or another person; or (2) strike any such part of a pleading or any part thereof that is immaterial or redundant." R. 4:6-4(b). Certain allegations contained in the Second Amended Complaint, as explained below, are impertinent, immaterial, or scandalous. Therefore, the Defendants respectfully request that the allegations discussed below be stricken. Moreover, the

Moreover, in ¶ 4 of the Second Amended Complaint, the Plaintiffs assert that their claims are not seeking redress for "religious discourse." Yet, in ¶ 124, the Second Amended Complaint defines Ms. Colón's actions as "religious persecution." The Plaintiffs cannot have it both ways. If the issues in the instant case are religious, then this secular Court has no standing to hear this dispute. If the issues in the instant case are secular, then this Court may hear the dispute, but the Plaintiffs cannot then redefine the issues as religious in order to obtain sympathy as the victims of "religious persecution." The Defendants object to the Plaintiffs' practice of injecting religion into the discussion where they find it convenient to do so, while simultaneously denying that religion is at the center of the controversy at all other times. Because the Second Amended Complaint alleges secular claims in a secular court, the reference to religious persecution in ¶ 124 is immaterial and should be stricken, pursuant to R. 4:6-4(b).

CONCLUSION

For the foregoing reasons, the Defendants respectfully request that this Court grant their Motion to Dismiss and Strike, and find that the prosecution of this lawsuit has been frivolous.

PAUL S. GROSSWALD
Attorney for Defendants
Michele Colón and
Tyler Newton

Dated: April 30, 2013

By: *Paul Grosswald*
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September 23, 2013

Via Hand Delivery

The Honorable Rachelle Lea Harz
Judge Superior Court
Superior Court of New Jersey
Bergen County Courthouse
10 Main Street, 3rd Floor
Hackensack, NJ 07601

Re: World Mission Society, Church of God, et al. v. Colón, et al.
Docket No: BER-L-5274-12

Dear Judge Harz:

I represent the Defendant Michele Colón in the above-referenced matter. I initially intended this letter to serve as a reply to Plaintiff World Mission's opposition to Ms. Colón's pending Motion for Reconsideration. However, Plaintiff World Mission never served me with an opposition to that motion. At the August 27, 2013 hearing in this matter, the Court rejected Plaintiff World Mission's request to be absolved of the obligation to oppose the motion, and ordered Plaintiff World Mission to submit a short, two-page opposition by Thursday, September 19, 2013. Plaintiff's counsel has made no attempt to contact me to ask for an extension or to otherwise explain why they have been unable to file an opposition. In light of Plaintiff World Mission's decision not to oppose Ms. Colón's motion for reconsideration, her motion should be granted.

In the event this Court is unwilling to grant Ms. Colón's motion in spite of the lack of opposition, I would like to address some of the statements made by Your Honor at the August 27, 2013 hearing pertaining to the pending motion.

1. False Light

With respect to the issue of whether a corporation has standing to sue for false light, Ms. Colón has repeatedly argued that false light is an invasion of privacy tort, and that invasion of privacy is a tort that only remedies emotional damages suffered by a human being. N.O.C., Inc. v. Schaefer, 197 N.J. Super. 249, 253 (Law Div. 1984). Ms. Colón has cited to Plaintiff World Mission's argument on pages 13 and 14 of its December 14, 2012 Reply Brief for its Motion to Amend. In those arguments, Plaintiff World Mission described the emotional damage allegedly suffered by its members. Plaintiff World Mission used that description of alleged emotional damage as the basis for its false light claim. In other words, Plaintiff World Mission is

before the "cult" statements are proven true? Because those statements do not contain sufficient factual content to be specifically defined, they must be treated as rhetorical hyperbole.

Because such rhetorical hyperbole does not imply specific facts, it is nonactionable. Ward v. Zelikovsky, 136 N.J. 516, 532 (1994). If the Court continues to treat such hyperbolic statements as if they are actionable, it will inevitably lead to expansive, unlimited discovery, imposing huge burdens on the parties and the Court. Therefore, the Court should reconsider its August 7, 2013 Decision and dismiss all of the statements from the case that consist of rhetorical hyperbole or which otherwise lack specific factual content.

3. Testimonial Immunity

Finally, Ms. Colón respectfully requests that this Court address once and for all the status of Plaintiff World Mission's claim that Ms. Colón committed defamation when testifying in a child custody case in New York. At the August 27 Hearing, this Court acknowledged that Ms. Colón was entitled to immunity when testifying and that she cannot be sued for such testimony. (Aug. 27, 2013 Audio Tr., 3:31:17 - 3:31:45.) Nevertheless, the Court has thus far been unwilling to explicitly state that the claim has been dismissed with prejudice. (Id.) The Court asserted that the issue is no longer before the Court because the testimonial claim was removed when Plaintiff World Mission's new lawyers amended the complaint for the first time. (Id.) However, because there has been no ruling on the merits of that issue, Plaintiff World Mission is free to re-file that claim - either in this case, or in a separate case filed in New York. Ms. Colón is entitled to receive a definitive ruling that says that the testimonial claim is dismissed on the merits, with prejudice. A revised proposed order containing language for such a ruling is enclosed herein.

For the foregoing reasons, Ms. Colón respectfully requests that her Motion for Reconsideration be granted.

Sincerely,



Paul S. Grosswald