

Exhibit B

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Attorney for Defendant,
Michele Colón

_____)	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.)	
)	ANSWER WITH
MICHELE COLÓN)	AFFIRMATIVE DEFENSES
)	
Defendant.)	
_____)	

Defendant Michele Colón ("Defendant" or "Ms. Colón"), by and through her attorney, Paul S. Grosswald, hereby Answers the Second Amended Complaint of the purported Plaintiff [hereinafter, the "Purported Plaintiff"] as follows:

NATURE OF THE ACTION

1. The allegations set forth in ¶ 1 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations.
2. The allegations set forth in ¶ 2 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations.
3. The allegations set forth in ¶ 3 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant answers as described herein. Defendant denies

the allegations contained in the first sentence. Defendant denies that the allegations contained in the second sentence accurately portray the Purported Plaintiff's beliefs. Defendant denies that the reason given in the third sentence for why people consider the Purported Plaintiff to be "strange" is the primary reason why people form that opinion about the Purported Plaintiff, but admits that many people form that opinion about the Purported Plaintiff and the World Mission Enterprise (a global organization based in South Korea and which does business in New Jersey) [hereinafter, the "World Mission Enterprise" or "World Mission"].

4. The allegations set forth in ¶ 4 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations, but admits that she and Mr. Newton have criticized the beliefs of the World Mission Enterprise, pointing out where they were internally inconsistent or contradicted scripture.
5. The allegations set forth in ¶ 5 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant answers as described herein. Defendant denies making any false statements. Defendant denies painting the Purported Plaintiff in a false light. Defendant denies her actions were malicious.
6. The allegations set forth in ¶ 6 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations.

PARTIES

7. Defendant denies the allegations set forth in ¶ 7 of the Second Amended Complaint, but admits that official records from the New Jersey Department of State describe the Purported Plaintiff as a New Jersey non-profit corporation, and that those same records describe 305 Godwin Avenue, Ridgewood, New Jersey, as the main business address for the Purported Plaintiff's service of process agent and other principals. Defendant denies that those records accurately portray the true nature of the Purported Plaintiff or the World Mission Enterprise. Defendant denies that the Purported Plaintiff is the real plaintiff in this case, and admits that the true plaintiff is the South Korean organization that runs the World Mission Enterprise ("World Mission South Korea").
8. The allegations set forth in ¶ 8 of the Second Amended Complaint refer to [REDACTED] ("Mr. [REDACTED] who has been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies that Mr. [REDACTED] is an individual member of the Purported Plaintiff but admits that he is an individual member of the World Mission Enterprise. Defendant admits that Mr. [REDACTED] is a resident of New Jersey and that the New Jersey branch of the World Mission Enterprise is Mr. [REDACTED] local branch.
9. With respect to the allegations set forth in ¶ 9 of the Second Amended Complaint, Defendant admits that she is an individual and that she resides in Passaic County, New Jersey. Defendant denies that she is a former member of the Purported Plaintiff but admits that she is a former member of the World Mission Enterprise. Defendant admits that when she was a member of the World Mission Enterprise, the New Jersey branch of the World Mission Enterprise was her local branch.

10. The allegations set forth in ¶ 10 of the Second Amended Complaint refer to Mr. Newton who is no longer a Defendant. Therefore, no response is required. To the extent a response is required, Defendant admits the allegations.
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JURISDICTION AND VENUE

11. Defendant admits the allegations set forth in ¶ 11 of the Second Amended Complaint.
12. The allegations set forth in ¶ 12 of the Second Amended Complaint refer to Mr. Newton who is no longer a Defendant. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
13. Defendant denies the allegations set forth in ¶ 13 of the Second Amended Complaint, but admits that the true Plaintiff, World Mission South Korea, does business in Bergen County, New Jersey and that venue is therefore proper in Bergen County.

ALLEGED FACTS RELEVANT TO ALL CAUSES OF ACTION

14. Defendant denies the allegations set forth in ¶ 14 of the Second Amended Complaint.
15. Defendant denies the allegations set forth in ¶ 15 of the Second Amended Complaint.
16. Defendant denies the allegations set forth in ¶ 16 of the Second Amended Complaint.
17. Defendant denies the allegations set forth in ¶ 17 of the Second Amended Complaint, but admits that Defendant set a meeting with Daniel Lee ("Mr. Lee") at which Mr. Lee advised Defendant and Mr. [REDACTED] not to get married. Defendant also denies that Daniel Lee can be fairly characterized as the "Pastor" of the Purported Plaintiff, but admits that Daniel Lee is more appropriately characterized as the New Jersey branch manager of the World Mission Enterprise.
18. Defendant denies the allegations set forth in ¶ 18 of the Second Amended Complaint, but admits that she and Mr. [REDACTED] were married on May 9, 2010.

19. Defendant admits the allegations set forth in ¶ 19 of the Second Amended Complaint, except that Defendant denies that the Purported Plaintiff is a "Church" rather than a profit-making business enterprise. Defendant also denies that the examples given to illustrate the Defendant's doubts are the only examples, or the most significant examples, of the doubts she experienced after her honeymoon.
20. Defendant denies the allegations set forth in ¶ 20 of the Second Amended Complaint, but admits that she met three times with Mr. Lee to discuss her doubts about the organization, and that Mr. ██████ attended two of those meetings.
21. Defendant admits the allegations set forth in ¶ 21 of the Second Amended Complaint, except that Defendant denies that Mr. ██████ continued attending services and participating in activities with the Purported Plaintiff with the same regularity as he always had in the past months. Rather, Mr. ██████ attendance and participation increased dramatically. Defendant also denies that the Purported Plaintiff is a "Church" rather than a profit-making business enterprise.
22. With respect to the allegations in ¶ 22 of the Second Amended Complaint, Defendant admits that despite being a newly-married couple, she and Mr. ██████ spent less and less of their free time together, and fought more and more often, because of the interference in their relationship from the Purported Plaintiff and the World Mission Enterprise.
23. Defendant admits the allegations set forth in ¶ 23 of the Second Amended Complaint, except that Defendant denies that Mr. ██████ was reluctant.
24. Defendant denies the allegations set forth in ¶ 24 of the Second Amended Complaint.
25. Defendant denies the allegations set forth in ¶ 25 of the Second Amended Complaint.

26. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth in ¶ 26 of the Second Amended Complaint.
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27. Defendant denies the allegations set forth in the first sentence of ¶ 27 of the Second Amended Complaint. The allegations set forth in the second sentence of ¶ 27 of the Second Amended Complaint constitute a characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations.
28. Defendant denies the allegations set forth in ¶ 28 of the Second Amended Complaint.
29. Defendant denies the allegations set forth in ¶ 29 of the Second Amended Complaint.
30. Defendant denies the allegations set forth in ¶ 30 of the Second Amended Complaint, except that Defendant admits that she did post some statements and videos online that are critical of the World Mission Enterprise.
- a. Defendant denies the allegations set forth in ¶ 30(a) of the Second Amended Complaint.
 - b. Defendant denies the allegations set forth in ¶ 30(b) of the Second Amended Complaint.
 - c. Defendant denies the allegations set forth in ¶ 30(c) of the Second Amended Complaint.
 - d. The allegation set forth in ¶ 30(d) of the Second Amended Complaint does not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations.

e. Defendant denies the allegations set forth in ¶ 30(e) of the Second Amended Complaint.

f. Defendant denies the allegations set forth in ¶ 30(f) of the Second Amended Complaint.

g. Defendant denies the allegations set forth in ¶ 30(g) of the Second Amended Complaint.

h. Defendant denies the allegations set forth in ¶ 30(h) of the Second Amended Complaint.

i. Defendant denies the allegations set forth in ¶ 30(i) of the Second Amended Complaint.

31. Defendant denies the allegations set forth in ¶ 31 of the Second Amended Complaint.

32. Defendant denies the allegations set forth in ¶ 32 of the Second Amended Complaint.

33. The allegation set forth in ¶ 33 of the Second Amended Complaint does not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegation.

34. The allegation set forth in ¶ 34 of the Second Amended Complaint does not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegation.

35. Defendant denies the allegations set forth in ¶ 35 of the Second Amended Complaint.

36. Defendant denies the allegations set forth in ¶ 36 of the Second Amended Complaint.

37. Defendant denies the allegations set forth in ¶ 37 of the Second Amended Complaint.

38. With respect to the allegations set forth in ¶ 38 of the Second Amended Complaint, Defendant denies the allegations in the first sentence. With respect to the remaining sentences, Defendant admits that she wrote the series of articles titled "How The WMSCOG Turned my Life Upside Down," and admits that those articles were published on the examiningthewsmcog.com website, with each part published a day or more apart from each other (hereinafter, the "Five-Part Story"). Defendant denies that she was responsible for the decision to publish them. Defendant also denies that she stated that the report originated from "our correspondent from New Jersey."
39. The allegations set forth in ¶ 39 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant admits that in the Five-Part Story she wrote the statement "I noticed that married couples and families did not study together unless there was a longer study being offered on a Sunday afternoon." Defendant denies the remaining allegations set forth in ¶ 39 of the Second Amended Complaint.
40. The allegations set forth in ¶ 40 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations set forth in ¶ 40 of the Second Amended Complaint.
41. Defendant denies the allegations set forth in ¶ 41 of the Second Amended Complaint.
42. The allegations set forth in ¶ 42 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and

therefore no response is required. To the extent a response is required, Defendant denies the allegations set forth in ¶ 42 of the Second Amended Complaint.

43. The allegations set forth in ¶ 43 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations set forth in ¶ 43 of the Second Amended Complaint.
44. The allegations set forth in ¶ 44 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations set forth in ¶ 44 of the Second Amended Complaint.
45. The allegations set forth in ¶ 45 of the Second Amended Complaint do not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant admits that in the Five-Part Story she wrote the statement "Just when I thought that things between us would get better, he informs me that he had been recently chosen to participate in an intense Bible study training course where he would learn to teach 30 subjects in 30 days." Defendant denies the remaining allegations set forth in ¶ 45 of the Second Amended Complaint.
46. With respect to the allegations set forth in ¶ 46 of the Second Amended Complaint, Defendant denies the allegations in the first sentence. The allegation in the second sentence does not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a

response is required, Defendant denies the allegation. Defendant denies the remaining allegations set forth in ¶ 46 of the Second Amended Complaint.

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47. Defendant denies the allegations set forth in ¶ 47 of the Second Amended Complaint.
 48. Defendant denies the allegations set forth in ¶ 48 of the Second Amended Complaint.
 49. With respect to the allegations set forth in ¶ 49 of the Second Amended Complaint, Defendant admits that she wrote an article titled "The WMSCOG 'Awarded by President Obama?'" (the "PVSA Article"). Defendant denies that she was responsible for the decision to publish it.
 50. With respect to the allegations set forth in ¶ 50 of the Second Amended Complaint, Defendant admits the allegations in the first sentence, but denies the allegations in the second.
 51. With respect to the allegations set forth in ¶ 51 of the Second Amended Complaint, Defendant denies the allegations in the first three sentences, and admits the allegations in the fourth sentence.
 52. Defendant denies the allegations set forth in ¶ 52 of the Second Amended Complaint, but admits that the World Mission Enterprise's New Jersey branch should not, under established rules, have received the Presidential Volunteer Service Award in the manner in which it did.
 53. Defendant admits the allegations set forth in ¶ 53 of the Second Amended Complaint.
 54. The allegations set forth in ¶ 54 of the Second Amended Complaint do not allege that the challenged statement was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations, except that Defendant admits that one of the videos she created was called

"The World Mission Society Church of God - Destroys Families" (the "Destroys Families Video"). Defendant also admits that the Destroys Families Video communicated the opinion that the World Mission Enterprise "uses mind control tactics on its members in order to tear them apart from their families."

55. The allegations set forth in ¶ 55 of the Second Amended Complaint do not allege that the challenged statement was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations.
56. The allegations set forth in ¶ 56 of the Second Amended Complaint do not allege that the challenged statement was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations.
57. The allegations set forth in ¶ 57 of the Second Amended Complaint do not allege that the challenged statement was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations, but admits that the Destroys Families Video uses rhetorical hyperbole to communicate the opinion that "Every waking moment must be focused on controlling the member's mind."
58. Defendant denies the allegations set forth in ¶ 58 of the Second Amended Complaint.
59. With respect to the allegation set forth in ¶ 59 of the Second Amended Complaint, Defendant admits that she created a video titled "World Mission Society Church of God - Public Financial Info!" (hereinafter, the "Financial Info Video"), and that she made statements in the Financial Info Video.

60. Defendant denies the allegations set forth in ¶ 60 of the Second Amended Complaint.
61. Defendant denies the allegations set forth in ¶ 61 of the Second Amended Complaint.

62. The allegations set forth in ¶ 62 of the Second Amended Complaint do not allege that the challenged statements alleged therein were of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegations, but admits that the Financial Info Video communicates the fact that the Bloomingdale, Illinois branch of the World Mission Enterprise received a little over \$26,000 from a "parental church" according to one of its IRS filings.
63. Defendant denies the allegations set forth in ¶ 63 of the Second Amended Complaint.
64. With respect to the allegations set forth in ¶ 64 of the Second Amended Complaint, Defendant denies the allegations in the first sentence. The allegation set forth in the second sentence does not allege that the challenged statement alleged therein was of and concerning the Purported Plaintiff, and therefore no response is required. To the extent a response is required, Defendant denies the allegation but admits that the Financial Info Video communicated the opinion that the World Mission Enterprise has used questionable business connections and tax filings, while asserting that more information will be forthcoming. Defendant denies the allegations in the third sentence.
65. The allegation set forth in ¶ 65 of the Second Amended Complaint refers only to allegations pertaining to Mr. Newton who has been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
66. Defendant denies the allegations set forth in ¶ 66 of the Second Amended Complaint.

67. The allegations set forth in ¶ 67 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from this case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
68. The allegations set forth in ¶ 68 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from this case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations, but admits she has telephoned Mr. [REDACTED] mother.
69. The allegations set forth in ¶ 69 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from this case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations in the first sentence. With respect to the allegation in the second sentence, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegation, but if the allegation is true then it was caused by the Purported Plaintiff, and not by Defendant.
70. The allegations set forth in ¶ 70 of the Second Amended Complaint have been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
71. The allegations set forth in ¶ 71 of the Second Amended Complaint have been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations. Defendant also denies that she is a plaintiff in this case.
72. The allegations set forth in ¶ 72 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.

73. Defendant denies the allegations set forth in ¶ 73 of the Second Amended Complaint.
74. The allegations set forth in ¶ 74 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
75. The allegations set forth in ¶ 75 of the Second Amended Complaint pertain only to the claims of Mr. [REDACTED] who has been dismissed from the case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations, except that she admits that Mr. [REDACTED] sued her for divorce.
76. The allegations set forth in ¶ 76 of the Second Amended Complaint constitute an argument and characterization of the claims in the action to which no response is required. Furthermore, the penultimate sentence refers only to the claims of Mr. [REDACTED] who has been dismissed from the case. Therefore, no response to the penultimate sentence is required. Moreover, the final sentence contains an incomplete thought to which no response is possible. To the extent a response is required, Defendant denies the allegations, except that she admits that she was a member of the World Mission Enterprise's New Jersey branch; that she was Mr. [REDACTED] wife, although not at all times that she was a member of the World Mission Enterprise's New Jersey branch; that she was there to witness all of the things that she has claimed that she witnessed (which are mischaracterized by the allegations in ¶ 76); and that she had the ability to experience all of the things that she has claimed that she experienced (which are mischaracterized by the allegations in ¶ 76).
77. The allegations set forth in ¶ 77 of the Second Amended Complaint constitute an argument and characterization of the claims in the action to which no response is

required. Furthermore, the first sentence contains an incomplete thought to which no response is possible. To the extent a response is required, Defendant denies the allegations.

78. The allegations set forth in ¶ 78 of the Second Amended Complaint constitute an argument and characterization of the claims in the action to which no response is required. Furthermore, the first sentence contains an incomplete thought to which no response is possible. To the extent a response is required, Defendant denies the allegations, except that she admits that the World Mission Enterprise and its New Jersey branch had destroyed her family and taken her husband from her.

79. The allegations set forth in ¶ 79 of the Second Amended Complaint constitute an argument and characterization of the claims in the action to which no response is required. To the extent a response is required, Defendant denies the allegations.

ALLEGED CAUSES OF ACTION

80. Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.

81. Defendant denies the allegations set forth in ¶ 81 of the Second Amended Complaint.

82. The allegations set forth in ¶ 82 of the Second Amended Complaint pertain only to Mr. Newton who has been dismissed from this case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.

83. With respect to the allegations set forth in ¶ 83 of the Second Amended Complaint, to the extent the allegations apply to Mr. Newton, who has been dismissed from this case, no response is required. To the extent the allegations apply to Ms. Colón, or to the extent that a response is otherwise required, Defendant denies the allegations.

84. Defendant denies the allegations set forth in ¶ 84 of the Second Amended Complaint.
85. Defendant denies the allegations set forth in ¶ 85 of the Second Amended Complaint.
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86. Defendant denies the allegations set forth in ¶ 86 of the Second Amended Complaint.
87. Defendant denies the allegations set forth in ¶ 87 of the Second Amended Complaint.
88. Because the Second Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 88 of the Second Amended Complaint. To the extent a response is required, Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
89. Because the Second Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 89 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
90. Because the Second Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 90 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
91. Because the Second Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 91 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
92. Because the Second Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 92 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
93. Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.

94. Defendant denies the allegations set forth in ¶ 94 of the Second Amended Complaint, except to the extent that Defendant has previously made admissions or qualifications in answering the specific paragraphs where these alleged statements are described. Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
95. The allegations set forth in ¶ 95 of the Second Amended Complaint pertain only to Mr. Newton who has been dismissed from this case. Therefore, no response is required. To the extent a response is required, Defendant denies the allegations.
96. With respect to the allegations set forth in ¶ 96 of the Second Amended Complaint, to the extent the allegations apply to Mr. Newton, who has been dismissed from this case, no response is required. To the extent the allegations apply to Ms. Colón, or to the extent that a response is otherwise required, Defendant denies the allegations, except to the extent that Defendant has previously made admissions or qualifications in answering the specific paragraphs where these alleged statements are described. Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
97. Defendant denies the allegations set forth in ¶ 97 of the Second Amended Complaint.
98. Defendant denies the allegations set forth in ¶ 98 of the Second Amended Complaint.
99. Defendant denies the allegations set forth in ¶ 99 of the Second Amended Complaint.
100. Defendant denies the allegations set forth in ¶ 100 of the Second Amended Complaint.
101. Defendant denies the allegations set forth in ¶ 101 of the Second Amended Complaint.
102. Because the Fourth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 102 of the Second Amended

Complaint. To the extent a response is required, Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.

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103. Because the Fourth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 103 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
 104. Because the Fourth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 104 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
 105. Because the Fourth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 105 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
 106. Because the Fourth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 106 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
 107. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations in ¶ 107 of the Second Amended Complaint. To the extent a response is required, Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
 108. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 108 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.

109. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 109 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
110. Because the Fifth Cause of Action has been dismissed from the case, and because the allegations set forth in ¶ 110 of the Second Amended Complaint pertain only to Mr. Newton, who has been dismissed from the case, no response is required. To the extent a response is required, Defendant denies the allegations.
111. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 111 of the Second Amended Complaint. Moreover, to the extent the allegations apply to Mr. Newton, who has been dismissed from this case, no response is required. To the extent the allegations apply to Ms. Colón, or to the extent that a response is otherwise required, Defendant denies the allegations.
112. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 112 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
113. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 113 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
114. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 114 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.

115. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 115 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
116. Because the Fifth Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 116 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
117. Because the Sixth Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 117 of the Second Amended Complaint. To the extent a response is required, Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
118. Because the Sixth Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 118 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
119. Because the Sixth Cause of Action and Mr. █████ have been dismissed from the case, and because the allegations set forth in ¶ 119 of the Second Amended Complaint pertain only to allegations against Mr. Newton, who has been dismissed from the case, no response is required. To the extent a response is required, Defendant denies the allegations.
120. Because the Sixth Cause of Action and Mr. █████ have been dismissed from the case, no response is required to the allegations set forth in ¶ 120 of the Second Amended Complaint. Moreover, to the extent the allegations apply to Mr. Newton, who has been dismissed from this case, no response is required. To the extent the allegations apply to Ms. Colón, or to the extent that a response is otherwise required, Defendant denies the allegations.

121. Because the Sixth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 121 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
122. Because the Sixth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 122 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
123. Because the Sixth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 123 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
124. Because the Sixth Cause of Action and Mr. [REDACTED] have been dismissed from the case, no response is required to the allegations set forth in ¶ 124 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
125. Because the Seventh Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 125 of the Second Amended Complaint. To the extent a response is required, Defendant repeats and reiterates her answers to the previous paragraphs as if fully set forth herein.
126. Because the Seventh Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 126 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
127. Because the Seventh Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 127 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.

128. Because the Seventh Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 128 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
129. Because the Seventh Cause of Action has been dismissed from the case, no response is required to the allegations set forth in ¶ 129 of the Second Amended Complaint. To the extent a response is required, Defendant denies the allegations.
130. With respect to all paragraphs in the Second Amended Complaint that refer to Mr. [REDACTED] as a plaintiff, Defendant denies that Mr. [REDACTED] is still a plaintiff in this case.
131. With respect to all paragraphs in the Second Amended Complaint that refer to Mr. Newton as a defendant, Defendant denies that Mr. Newton is still a defendant in this case.

**STATEMENT OF FACTS SUPPORTING DEFENDANT'S
AFFIRMATIVE DEFENSES**

I. INTRODUCTION

1. The Purported Plaintiff holds itself out to be a non-profit charitable "church," but it is actually the New Jersey branch of the World Mission Enterprise, or World Mission, a profit-making global criminal enterprise based in South Korea.
2. World Mission recruited Defendant to become a member of the global criminal enterprise, through its New Jersey branch, and did so without Defendant's knowledge or informed consent.
3. The Purported Plaintiff fraudulently extracted donations of money, time, and energy from Defendant 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 Defendant caught on to the scheme and began complaining, the Purported Plaintiff retaliated against Defendant by hacking into her Internet accounts.

5. The Purported Plaintiff also retaliated against Defendant by telling its members, including Mr. [REDACTED] that they should no longer have any communication with Defendant.
6. World Mission is controlled by World Mission South Korea.
7. Gil Jah Chang, a.k.a. "Gil Jah Zhang" ("Chang") is and has been one of two leaders of World Mission South Korea.
8. Joo Cheol Kim ("Kim") is and has been the General Pastor for World Mission South Korea.
9. Chang and Kim work together as the two leaders of World Mission South Korea.
10. Chang and Kim work together as the two leaders of the entire World Mission Enterprise.
11. Chang and Kim are not and have not been accountable to anyone within World Mission South Korea other than themselves.
12. Chang and Kim are not and have not been accountable to anyone within the World Mission Enterprise other than themselves.
13. The Purported Plaintiff is and has been under the control and domination of World Mission South Korea, Chang, and Kim.

II. BACKGROUND FACTS REGARDING THE WORLD MISSION ENTERPRISE

A. The World Mission Enterprise

14. The World Mission Enterprise began as a single "church" established in South Korea in 1964 by Ahn Sahng Hong.
15. Ahn Sahng Hong died in 1985.

16. The World Mission Enterprise was subsequently taken over by Chang, Ahn Sahng Hong's "spiritual" wife, who refers to herself as "God the Mother."

17. In 1985, Kim was appointed as the "General Pastor" for the global World Mission "church."
18. Since around that time, Chang and Kim have run the World Mission Enterprise together.
19. Chang and Kim control and operate the entire World Mission Enterprise through World Mission South Korea.
20. World Mission South Korea is and has been the global headquarters for the World Mission Enterprise.
21. The World Mission Enterprise consists of a global network of approximately 1400 local World Mission entities spread around the world.
22. One of those local entities is the Purported Plaintiff.
23. World Mission South Korea seeks to create the appearance that the Purported Plaintiff is independent of World Mission South Korea.
24. To create such an appearance, the Purported Plaintiff has incorporated to give itself a separate corporate identity.
25. Nevertheless, the Purported Plaintiff is operated and controlled by World Mission South Korea.
26. The Purported Plaintiff has no ability to operate independently of World Mission South Korea.
27. Mr. Lee was made the "Pastor" of the Purported Plaintiff by World Mission South Korea.
28. If Mr. Lee attempted to operate the Purported Plaintiff independently of World Mission South Korea, he would be removed from his post by World Mission South Korea.

29. World Mission South Korea regularly sends and has regularly sent the Purported Plaintiff instructions on how to conduct its operations.

30. The Purported Plaintiff regularly sends and has regularly sent its attendance records to World Mission South Korea.
31. The Purported Plaintiff regularly sends and has regularly sent its donation records to World Mission South Korea.
32. With limited exception, World Mission South Korea approves and has approved all official literature, policies and practices used and employed by the Purported Plaintiff.
33. On information and belief, almost all of the money raised by the Purported Plaintiff is forwarded and has been forwarded to World Mission South Korea.
34. The Purported Plaintiff is the alter ego of World Mission South Korea.
35. World Mission South Korea is the alter ego of the Purported Plaintiff.
36. The Purported Plaintiff is also the alter ego of several profit-making companies (the "Profit-Making Companies").
37. The Profit-Making Companies include but are not necessarily limited to Big Shine Worldwide, Inc. ("Big Shine"), a corporation which sells electronic goods and services, with its principal place of business in New Jersey; Albright Electric, LLC ("Albright"), a corporation which provides contractors to perform electrical work, with its principal place of business in New Jersey; and Lincoln Grill & Café Limited Liability Company ("Lincoln Grill"), a corporation which operates a restaurant, with its principal place of business in New Jersey.
38. Each of the Profit-Making Companies is the alter ego of the Purported Plaintiff.

B. Status of the World Mission Enterprise, and Its Constituents, as a "Religion"

39. The Purported Plaintiff claims to be a "church."

40. The Purported Plaintiff tries to avoid being held accountable for its actions by portraying its secular crimes and torts as "religious" so that it can take advantage of laws that give special protections to religions.
41. The Purported Plaintiff has obtained religious tax exemption from the IRS.
42. The Purported Plaintiff obtained its religious tax exemption from the IRS by fraudulent means.
43. The Purported Plaintiff made a number of material false representations in its application for tax exemption to the IRS.
44. The Purported Plaintiff was required to disclose on its application for tax exemption that it has a close connection with World Mission South Korea.
45. On its application for tax exemption, the Purported Plaintiff failed to disclose to the IRS that it has a close connection with World Mission South Korea.
46. The Purported Plaintiff was required to disclose on its application for tax exemption that it sends money to World Mission South Korea.
47. On its application for tax exemption, the Purported Plaintiff failed to disclose to the IRS that it sends money to World Mission South Korea.
48. On information and belief, the Purported Plaintiff has used its tax exemption fraudulently by using its tax exemption number to purchase inventory and supplies for the Profit-Making Companies.
49. On information and belief, the Profit-Making Companies then send their profits back into the Purported Plaintiff, to avoid taxation.

50. For the foregoing reasons, the Purported Plaintiff is not entitled to maintain its religious tax exemption.
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51. The Purported Plaintiff is not entitled to use its current tax-exempt status as evidence of its religious nature.
52. The Purported Plaintiff is not entitled to raise any claim or assert any privilege that is based on "religious freedom," the "free exercise of religion," or its status as a "religion" or "church."
53. Even if the Purported Plaintiff is deemed to be a "religion" or a "church," the conduct alleged herein in support of Defendant's Affirmative Defenses does not constitute religious expression, in that the goal of the Purported Plaintiff's conduct was not to advance its religion, but rather to advance the criminal enterprise and to defraud and injure Defendant.
54. Even if the conduct alleged herein constitutes religious expression, the Purported Plaintiff's claims may still be barred by Defendant's Affirmative Defenses because the Purported Plaintiff's conduct tends to inflict serious, life-threatening harm on its victims.
55. Victims of the Purported Plaintiff and World Mission Enterprise often become suicidal, depressed, anxious, psychotic, or alienated from their families as a result of the conduct of the Purported Plaintiff and the World Mission Enterprise.
56. Therefore, the State of New Jersey has a compelling interest in stopping such conduct by allowing Defendant to assert her Affirmative Defenses against the Purported Plaintiff.
57. Allowing Defendant to assert her Affirmative Defenses against the Purported Plaintiff is the least restrictive means for the State of New Jersey to satisfy its compelling interest.

C. Criminal Nature of the World Mission Enterprise

58. Despite the pretense that World Mission South Korea and the Purported Plaintiff are "churches" which exist for non-profit purposes, the Purported Plaintiff is actually part of a criminal business enterprise which is run for a profit.
59. The Purported Plaintiff purportedly subsists off of the donations of its members.
60. However, in addition to collecting donations from its members, the Purported Plaintiff also dominates and controls the Profit-Making Companies.
61. On information and belief, the Purported Plaintiff has used its nonprofit tax exemption number to purchase supplies and inventory for the Profit-Making Companies.
62. The Purported Plaintiff has staffed the Profit-Making Companies exclusively with its own members.
63. The Purported Plaintiff members who have staffed the Profit-Making Companies have been abused and exploited, and subjected into a state of de facto slavery.
64. The Profit-Making Companies have frequently paid their employees less than a living wage.
65. The Profit-Making Companies have frequently paid their employees off the books, so payroll taxes were avoided.
66. As a result of the facts alleged in the previous paragraph, the employees did not get social security credit that would otherwise be entitled to.
67. In fact, Victor Lozada ("Mr. Lozada"), has been an off-the-books employee of Big Shine.
68. Mr. Lozada is one of the members of the Purported Plaintiff's litigation control group for this case.

69. The Profit-Making Companies have generally provided no health or retirement benefits to their employees.

70. The Profit-Making Companies have generally worked their 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 have been required or expected to spend all day at the Purported Plaintiff.
71. The Profit-Making Companies generally have not paid overtime rates for hours worked beyond 40 hours a week.
72. The Profit-Making Companies, in conjunction with the Purported Plaintiff, have used and threatened to use discipline and intimidation on any employee or member who has complained or who threatened to report these abuses to the authorities.
73. On information and belief, most of the profits generated by the Profit-Making Companies as a result of this scheme have been transferred back to the Purported Plaintiff, in order to avoid taxation.
74. On information and belief, the Purported Plaintiff has sent those profits, or most of them, to World Mission South Korea.
75. Many of the transactions conducted by the Profit-Making Companies have been conducted in cash, so as to avoid detection by tax authorities.
76. The transfer of money from the Profit-Making Companies to the Purported Plaintiff and from the Purported Plaintiff to World Mission South Korea has often been done in cash, so as to avoid detection by tax authorities.
77. In fact, cash earned by Lincoln Grill has been transported to the Purported Plaintiff in a shoebox, and kept in a safe in Mr. Lee's office.

78. From time to time, Mr. Lee has placed cash in sealed envelopes which he has given to members of the Purported Plaintiff, who have been instructed to personally travel to World Mission South Korea to deliver the envelopes. The members making such deliveries generally did not know what they were delivering, or why.
79. To further prevent this scheme from being detected, the Profit-Making Companies have been documented to be owned not by the Purported Plaintiff, but rather by individual members of the Purported Plaintiff.
80. Such documentation was designed to create the appearance that the Purported Plaintiff was not actually controlling the Profit-Making Companies.
81. Yet, in some cases the individual member of the Purported Plaintiff whose name was listed as the legal owner of a Profit-Making Company was not aware of even the most fundamental details of the entity that such person supposedly owned.
82. In some cases, the individual member of the Purported Plaintiff whose name was listed as the legal owner of a Profit-Making Company had their name placed on corporate documents and banking documents without their knowledge or consent.
83. The Purported Plaintiff has not and does not disclose the crimes and fraud alleged herein to the general public, or to the Purported Plaintiff'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.

D. Activities of the Purported Plaintiff

84. The Purported Plaintiff engages in three primary activities: services, studies, and recruiting.

85. "Services" are "religious" services held in a "sanctuary" filled with the Purported Plaintiff's members. The services are held numerous times throughout the week and three times on Saturday. Services are led by Mr. Lee, or an agent assigned by Mr. Lee.
86. "Studies" are classroom sessions, led by a teacher who has been selected and trained by the Purported Plaintiff. Every new recruit is required to go through a number of basic studies.
87. "Recruiting" is the process by which the Purported Plaintiff obtains new members.
88. Members of the Purported Plaintiff are subjected to a great deal of pressure to recruit new members, including their friends and families.
89. On some occasions, the Purported Plaintiff has imposed recruiting quotas on its members.
90. The Purported Plaintiff generally engages in recruiting every day of the week, at various times of day, sometimes as late as 1 a.m.
91. Generally, on every Sunday afternoon, Mr. Lee and his agents gather members of the Purported Plaintiff and put them into groups, assigning each group to a recruiting location.
92. The groups generally go to populated areas, such as big box stores, including Target and Walmart, or shopping malls.
93. At other times, the Purported Plaintiff sends recruiters to college campuses.
94. The Purported Plaintiff also sends recruiters into residential neighborhoods to go door-to-door.
95. The recruiters are trained by Mr. Lee and Mr. Lee's agents to use aggressive, intrusive, and deceptive tactics to induce unsuspecting people to join the Purported Plaintiff.

96. Because the Purported Plaintiff is a profit-making enterprise, it generally only recruits employed people who are able to meet the donation requirements.

97. The Purported Plaintiff 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

98. The Purported Plaintiff uses a number of psychological control tactics, as described below, to prevent its members from exposing its criminal and tortious behavior.

99. These psychological control tactics are designed by Chang and Kim in the first instance, and subsequently implemented and enforced within the Purported Plaintiff by Mr. Lee and his agents.

100. For instance, the Purported Plaintiff members are not permitted to express any doubts or criticisms about World Mission or its leaders.

101. Members who express such doubts will be called into a meeting with higher ranking members.

102. The higher ranking members will talk to the doubting member to try to overcome the doubts.

103. The higher ranking members will try to convince the doubting member to suppress or ignore the doubts.

104. If the doubts persist, then the doubting member will be severely ostracized by the rest of the group.

105. The doubting member will be physically separated from other members of the group.

106. At the Purported Plaintiff's services and study sessions, the doubting member will be required to sit surrounded by higher ranking members.

107. The Purported Plaintiff 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.
108. The Purported Plaintiff threatens doubting members with being kicked out of World Mission.
109. In fact, the Purported Plaintiff has often kicked out doubting members.
110. The Purported Plaintiff often requires its members to sign a Non-Disclosure Agreement ("NDA") which prohibits the member from discussing anything about the Purported Plaintiff or the World Mission Enterprise with outsiders, even after the member leaves the group.
111. Members who refuse to sign NDAs after being asked to sign one are usually kicked out or threatened with being kicked out.
112. Once a person is kicked out of the Purported Plaintiff it becomes difficult for that person to maintain a relationship with their loved ones who are still members of World Mission.
113. The Purported Plaintiff does not permit its members to maintain relationships with its former members.
114. The Purported Plaintiff does not permit its members to maintain relationships with former members of any other World Mission entity.
115. In the past, the Purported Plaintiff has instructed or required its members to divorce their spouses when their spouses begin expressing doubts about World Mission.

116. In the past, the Purported Plaintiff has instructed or required its members to cut off communication with their families and friends when the families or friends begin expressing doubts about World Mission.

117. As a result of such tactics, many families have been broken up or destroyed.

118. There are countless people who have lost contact with their parents, children, spouses, or other family and friends, as a result of the Purported Plaintiff's tactics.

F. The "Righteous Lie Doctrine"

119. The Purported Plaintiff adheres to the "Righteous Lie Doctrine," which is a policy and practice of telling "Righteous Lies."

120. 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.

121. The Purported Plaintiff believes that it is not immoral to lie in such circumstances because the ends justify the means.

122. The Purported Plaintiff generally does not disclose to people outside the World Mission Enterprise that it adheres to a policy and practice of telling "Righteous Lies."

123. The Purported Plaintiff does not disclose to people inside the World Mission Enterprise that it adheres 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."

124. 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 the Purported Plaintiff by Mr. Lee and his agents.

III. DEFENDANT'S INVOLVEMENT WITH THE PURPORTED PLAINTIFF

A. Defendant's Recruitment Into the Purported Plaintiff

125. In April, 2008, Defendant met and began dating Mr. [REDACTED] her future husband.
126. In 2009, two of Defendant's co-workers began trying to persuade Defendant to attend their "church" with them.
127. The co-workers had told Defendant that they really enjoyed attending their "church," but they did not disclose to Defendant anything about the "church's" beliefs, policies or practices.
128. In October 2009, on a Monday night, Defendant agreed to attend the "church" with her co-workers. Defendant 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.
129. Defendant 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 Defendant to end up at the "church" without access to her own vehicle.
130. The "church" they brought her to was the Purported Plaintiff.
131. From that night forward, everything that the Purported Plaintiff did to, for, and with Defendant 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 the Purported Plaintiff by Mr. Lee and his agents.
132. Upon arriving at the Purported Plaintiff, Defendant was given a questionnaire to fill out. The questionnaire was designed to acquire background information about Defendant that the Purported Plaintiff could use to manipulate her.

133. Then Defendant 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 Purported Plaintiff presented her with her first "study lesson."
134. None of the other members were present in the room. Defendant subsequently learned that new recruits are kept separated from more experienced members during their first few study lessons.
135. Almost immediately, the Purported Plaintiff began systematically and deliberately indoctrinating Defendant with irrational fears.
136. For instance, the Purported Plaintiff indoctrinated Defendant to believe that terrible things would happen to her if she used the Internet to conduct research on the Purported Plaintiff.
137. The reason the Purported Plaintiff indoctrinated Defendant to believe that terrible things would happen to her if she used the Internet to conduct research on the Purported Plaintiff was to prevent Defendant from learning the truth about the Purported Plaintiff's criminal, tortious, and unethical behavior.
138. The first demand the Purported Plaintiff made on Defendant was that she had to be "baptized." After being subjected to intense social pressure, Defendant was unduly influenced into being "baptized."
139. After being baptized, one of the Purported Plaintiff's deacons entered Defendant'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. Defendant later learned that the co-workers who had recruited Defendant were being given "credit" for having recruited her.

140. The co-workers had not previously disclosed to Defendant that they had been given recruiting quotas and that they brought Defendant to the Purported Plaintiff in order to fulfill those quotas.
141. The Purported Plaintiff also demanded that Defendant come back for additional study lessons later that week. At the time, Defendant 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, Defendant was unduly influenced and agreed to return later in the week.
142. At the time of her recruitment into the Purported Plaintiff, Defendant had been dating her boyfriend, Mr. [REDACTED] for over one year.
143. About two weeks after joining the Purported Plaintiff, Defendant recruited Mr. [REDACTED] into the Purported Plaintiff. The Purported Plaintiff had led Defendant to believe that the Purported Plaintiff encouraged family members, friends, and significant others to participate in the Purported Plaintiff's activities together.
144. Mr. [REDACTED] was subsequently "baptized" by the Purported Plaintiff.
145. Defendant also recruited her then-15 year old son into the Purported Plaintiff.
146. Defendant began attending the Purported Plaintiff on Tuesdays and Saturdays, and occasionally at additional times during the week.
147. Defendant was told to complete a number of "Basic Studies."
148. However, when Defendant went to complete the Basic Studies, the Purported Plaintiff told her that she had to study separately from Mr. [REDACTED] and separately from her son.
149. Defendant learned that the Purported Plaintiff generally prohibited men and women from studying together.

150. The Purported Plaintiff also imposed assigned seating at all of its services. Men and women were generally seated separately from each other.

151. As a result, married couples and families could not usually sit together during services.
152. With few exceptions, the Purported Plaintiff did not permit Defendant to sit with Mr. [REDACTED] or with her son during services.
153. The Purported Plaintiff also did not permit Defendant to attend study sessions with Mr. [REDACTED] or with her son.
154. Defendant also came to learn that some of the study sessions were as long as six hours.
155. Defendant eventually learned that most of the members spent their entire Saturday with the Purported Plaintiff, starting from about 9 am (and on special holidays as early as 5 am) to 10 pm.
156. During that time, the members would attend up to three services.
157. In between the services, the members would engage in other activities pertaining to the Purported Plaintiff.
158. Sometimes, those other activities consisted of watching propaganda videos produced by the Purported Plaintiff or World Mission.
159. The propaganda videos usually touted the supposedly exceptional qualities of Chang, the "Mother God."
160. 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 Mr. Lee) will suffer the same fate as the people who perished in the disasters.

B. The Increasing Time Commitment

161. Shortly after joining the Purported Plaintiff, Defendant began to feel pressure from the Purported Plaintiff to spend her entire Saturday at the Purported Plaintiff.
162. Mr. Lee told Defendant, and the other members, that they should not question the amount of time that the Purported Plaintiff expects them to spend at the Purported Plaintiff.
163. When Defendant would complain about the amount of time she was being asked to spend at the Purported Plaintiff, the Purported Plaintiff and Mr. Lee would manipulate her by making her feel guilty, fearful, or ashamed about the fact that she wanted to devote less time to the Purported Plaintiff.
164. As a result of such pressure, Defendant was unduly influenced into increasing her attendance, and she began attending two services on Saturdays.
165. From the beginning, the Purported Plaintiff assigned a group of "older sisters" to Defendant.
166. The older sisters were experienced members of the Purported Plaintiff whose role was to groom Defendant to bring her into a state of compliance with the Purported Plaintiff's demands.
167. Defendant soon began receiving text messages from her older sisters on Fridays or Saturdays, asking what time she would be at the Purported Plaintiff for services.
168. The frequency of the text messages from the older sisters increased, until the messages were being sent every single day.
169. Eventually, the older sisters began sending the text messages to Defendant while she was at work.

170. The time commitment that the Purported Plaintiff demanded from Defendant steadily increased month after month.

171. Six months after joining the Purported Plaintiff, Defendant and Mr. [REDACTED] became engaged to be married.

172. A month after that, they bought a home together.

173. Defendant began to feel overwhelmed by the amount of time she was required to spend with the Purported Plaintiff while undergoing these life transitions.

174. After a while, Saturdays were not enough for the Purported Plaintiff. Defendant was pressured to attend the Purported Plaintiff on Sundays, as well.

175. Before long, Defendant was unduly influenced into attending the Purported Plaintiff all day Saturday and Sunday, every weekend, as well as a few days a week after work.

C. Sleep Deprivation

176. Defendants deliberately deprived Defendant of sleep, in order to weaken her mind and make her more susceptible to the Purported Plaintiff's demands.

177. For instance, the Purported Plaintiff holds a number of "Feasts" during the year.

178. During the Feasts, members are required, expected, or encouraged to attend services at 5:00 am and then again at 7:30 pm for up to ten days at a time.

179. Defendant tried attending the 5:00 am services but found that it was nearly impossible for her.

180. Defendant did attend the 7:30 pm services despite being exhausted after a long day at work.

D. Family Separation

181. Defendant's family (mother, stepfather, and sister) became increasingly concerned about the amount of time that Defendant was spending at the Purported Plaintiff.
182. Defendant tried numerous times to get her family to join the Purported Plaintiff, but to no avail.
183. The Purported Plaintiff pressured Defendant to choose between the Purported Plaintiff or her family.
184. The Purported Plaintiff did not want Defendant to attend her nephew's birthday party because it was on a Saturday. As a result of enormous social pressure, Defendant was unduly influenced into skipping her nephew's birthday party so that she could spend the day at the Purported Plaintiff.
185. This was the first of many conflicts that the Purported Plaintiff would cause between Defendant and her mother, stepfather, and sister.
186. Defendant eventually learned that the Purported Plaintiff views families as a "distraction."
187. Defendant also learned that the Purported Plaintiff discourages its members from having children.
188. Defendant also learned that the Purported Plaintiff discourages its members from taking vacations.
189. In early 2010, Defendant and Mr. █████ met with Mr. Lee to discuss their relationship.
190. At that meeting Mr. Lee attempted to split them up.
191. Mr. Lee told Defendant and Mr. █████ that they were not good together and that they should each be with other people.

192. Nevertheless, the couple stayed together.
193. On May 9, 2010, Defendant and Mr. [REDACTED] were married.

194. After that, Defendant and Mr. [REDACTED] left for their honeymoon in Mexico. That would be the last vacation they would spend together.
195. Mr. 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, Mr. Lee advised them to spend their honeymoon time reading a book written by Kim.
196. When the couple returned, the Purported Plaintiff dramatically increased the pressure on the couple to spend more time with the Purported Plaintiff.

E. Defendant Was Conscripted to Recruit New Members

197. After their honeymoon, the Purported Plaintiff instructed Defendant to spend a lot more time on recruiting new members.
198. On Sundays, the Purported Plaintiff sent Defendant and her "sisters" to recruit new members.
199. They would go to crowded areas, like shopping malls, or large box stores, such as Target or Walmart.
200. They would walk up to complete strangers.
201. The strangers they approached were usually young, in their twenties or thirties.
202. When approaching a stranger, they would often ask them things like if they had ever heard about the "Mother God."
203. Most people would reject them.
204. On a few occasions, security had to ask them to leave because customers were complaining about the aggressive and intrusive tactics used by Defendant's "sisters."

205. Defendant naturally felt anxious and humiliated during those recruiting attempts.

F. Defendant Encounters the "Righteous Lie Doctrine"

206. Eventually, Defendant began having doubts about the Purported Plaintiff and World Mission.

207. When Defendant began questioning Mr. Lee, she discovered that Mr. Lee was relying on the "Righteous Lie Doctrine."

208. For instance, after Defendant caught Mr. Lee lying to her about an alleged translation error in a World Mission book, Mr. Lee convinced Mr. [REDACTED] that if Mr. Lee had lied it was excusable, because Mr. Lee was trying to "save" Defendant.

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

G. Defendant Starts to Uncover the Truth

210. In or around October 2010, Defendant met with Mr. Lee to discuss her doubts. Mr. [REDACTED] attended that meeting as well.

211. Defendant was surprised to learn at that meeting that one of the women that recruited her had recently left her husband because the husband had decided to stop attending the Purported Plaintiff.

212. Eventually Defendant ventured onto the Internet, and discovered disturbing information about World Mission, which caused her to start questioning the Purported Plaintiff's practices.

213. For instance, she discovered a website that labeled World Mission as a "cult."

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

215. 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.
216. Defendant recognized that the Purported Plaintiff was using the thought reform techniques that Lifton identified.
217. Defendant was shocked and dismayed when she discovered that information.
218. The same day that Defendant found critical information about the Purported Plaintiff on the Internet, she shared that information with Mr. [REDACTED]
219. Mr. [REDACTED] reacted the same way Defendant had. He was shocked.
220. Mr. [REDACTED] admitted that he and Defendant had been fooled.
221. Mr. [REDACTED] wondered why an organization would take advantage of people like that.
222. Mr. [REDACTED] said that he felt "lost" and did not know "where to go now."
223. At that time, Mr. [REDACTED] was on the third day of a three-day fast, mandated by the Purported Plaintiff. Defendant was not participating in the fast, but Mr. [REDACTED] was starving. Defendant and Mr. [REDACTED] decided to go to dinner, and not attend the Purported Plaintiff that evening as they were scheduled to do.
224. The Purported Plaintiff takes attendance at every service and study.
225. As a result, the Purported Plaintiff quickly discovered that Defendant and Mr. [REDACTED] were not there.
226. That night, Defendant and Mr. [REDACTED] were each separately contacted by members of the Purported Plaintiff wanting them to explain their absence.
227. Defendant explained that they had found disturbing information on the Internet that caused them to reconsider whether they should return to the Purported Plaintiff.

228. The Purported Plaintiff members pressured Defendant and Mr. [REDACTED] to attend a meeting with Mr. Lee.
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229. The Purported Plaintiff members promised Defendant and Mr. [REDACTED] that all of their questions would be answered.
230. The Purported Plaintiff members assured Defendant and Mr. [REDACTED] that all of the information they had found on the Internet were lies.
231. A few days later, Defendant and Mr. [REDACTED] went to the Purported Plaintiff's location in Ridgewood, New Jersey, to meet with Mr. Lee.
232. When they arrived in Mr. Lee's office, there were other members present, including Mr. Lozada.
233. During that meeting, Mr. Lee gave Defendant assurances that all of her questions would be answered.
234. At that meeting, it was explained to Defendant that World Mission is persecuted on the Internet by people spreading lies about "Father" (Ahn Sahng Hong) and "Mother" (Chang).
235. Defendant asked Mr. Lee why faithful members of the Purported Plaintiff separated from their non-believing spouses.
236. Mr. Lee explained that the non-believing spouses usually had a problem with how much time their spouse was spending in the Purported Plaintiff.
237. According to Mr. Lee, the non-believing spouse would usually try to make the member choose between remaining a member or staying in the marriage.
238. Notwithstanding Mr. Lee's explanation, it is in fact Mr. Lee himself who usually makes the decision as to whether a member should leave their non-believing spouse.

239. Mr. Lee frequently orders members of the Purported Plaintiff to get divorced, if not directly then through his agents.
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240. Members of the Purported Plaintiff 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.
241. After the meeting, Defendant and Mr. [REDACTED] attended another service at the Purported Plaintiff.
242. At that service, Defendant was required to sit with Mr. [REDACTED] so that she would not "contaminate" her "sisters" with her doubts.
243. Yet, when Defendant asked one of the Purported Plaintiff's deaconesses for an explanation of why she was being told to sit with Mr. [REDACTED] the deaconess lied to her, and told her that "sometimes married couples sit together."
244. Prior to that day, Defendant had never observed married couples sitting together at a service at the Purported Plaintiff.
245. At the end of that service, Mr. Lee explicitly stated that it was not acceptable for members of the Purported Plaintiff to ask questions about information they acquired from the Internet.
246. Mr. Lee made an exception for new members who had not finished their Basic Studies yet.
247. Mr. Lee said that if a member asked questions after having completed the Basic Studies, then the member was "stupid."
248. Mr. Lee made this announcement just a few days after having promised Defendant and Mr. [REDACTED] that all of their questions would be answered.

H. The Purported Plaintiff Retaliates Against Defendant

249. Shortly thereafter, the Purported Plaintiff launched a campaign to retaliate against Defendant.
250. The Purported Plaintiff began pressuring Mr. [REDACTED] to spend more time away from Defendant, and more time with the Purported Plaintiff.
251. The Purported Plaintiff repeatedly told Mr. [REDACTED] that he needed to "learn and study more."
252. The Purported Plaintiff told Mr. [REDACTED] bad things about Defendant with the intent of poisoning their relationship.
253. The Purported Plaintiff required Mr. [REDACTED] to attend the Purported Plaintiff every day after work and kept him there until after midnight.
254. The Purported Plaintiff told Mr. [REDACTED] to move out of the marital home and get divorced.
255. At the urging of the Purported Plaintiff, Mr. [REDACTED] moved out one Friday while Defendant was at work.
256. The Purported Plaintiff told Mr. [REDACTED] not to tell Defendant where he would be living.
257. After a few days, Mr. [REDACTED] blackmailed Defendant by offering to move back into their marital home on the condition that Defendant return to the Purported Plaintiff once a week.
258. As a result, Defendant was unduly influenced into returning to the Purported Plaintiff.
259. Then, the Purported Plaintiff required Defendant to repeat the Basic Studies.
260. When Defendant returned to the Purported Plaintiff, she found that she was being ostracized by the other members.

261. The Purported Plaintiff required Defendant to complete the Basic Studies with Mr. Lee, rather than with one of the other teachers who would ordinarily teach the Basic Studies.
-
262. The Purported Plaintiff also required Defendant to complete the Basic Studies in Mr. Lee's office, rather than in one of the designated study rooms where the Basic Studies would ordinarily be taught.
263. Mr. Lee became very frustrated with Defendant when she would ask questions during the Basic Studies.
264. When Defendant asked Mr. Lee about divorce, Mr. Lee made it clear that he believes that loyalty to the Purported Plaintiff is more important than being married.
265. After that, Defendant attended only one more service with the Purported Plaintiff.
266. Defendant wanted to sit with Mr. [REDACTED] 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. The Purported Plaintiff pretended that no one knew where Mr. [REDACTED] was so that she would not be able to sit with him.
267. As a result, Defendant ended up having to sit with the other women, between two high-ranking members, including Tara Byrne, to prevent Defendant from interacting with and "contaminating" other members with her doubts.
268. Tara Byrne is one of the members of the Purported Plaintiff's litigation control group for this case.

I. The Purported Plaintiff Hacks Into Defendant's Internet Accounts

269. Defendant subsequently began posting statements to the Internet that were critical of the World Mission Enterprise and the Purported Plaintiff.

270. Defendant posted those statements anonymously because she feared retaliation from the Purported Plaintiff.
-
271. In or around 2009, the Purported Plaintiff established a bogus website to entrap critics of the Purported Plaintiff and the World Mission Enterprise.
272. The bogus website was located at the following URL: cultwatchahnsahngong.com (the "Cult Watch Site").
273. The Cult Watch Site promoted itself as a website that was critical of cults.
274. The Cult Watch Site contained criticisms of World Mission.
275. Defendant subsequently found the Cult Watch Site, and began anonymously posting information that was critical of World Mission to the Cult Watch Site.
276. In order to post information to the Cult Watch Site, Defendant needed to register with the Cult Watch Site by entering her email address and a password.
277. Defendant did not realize that by doing that, she was inadvertently giving her email address and password to the Purported Plaintiff.
278. The Purported Plaintiff then used Defendant's email address and password to attempt to hack into other Internet sites containing anonymous postings regarding World Mission.
279. Through trial and error, the Purported Plaintiff eventually uncovered other anonymous postings that were made by Defendant.
280. The Purported Plaintiff then disclosed to Mr. [REDACTED] and other members of the Purported Plaintiff that Defendant was the anonymous author behind those statements.
281. The Purported Plaintiff used the information it had acquired through hacking to poison the relationship between Mr. [REDACTED] and Defendant.

282. Specifically, the Purported Plaintiff told Mr. [REDACTED] that it had "evidence" that Defendant had posted critical statements about World Mission.

283. Mr. [REDACTED] became angry at Defendant, telling her that the Purported Plaintiff had "evidence" against her.

284. The Purported Plaintiff subsequently set up a second fake anti-cult website.

285. The second fake anti-cult website also promoted itself as a website that was critical of cults.

286. The second fake anti-cult website also contained criticisms of World Mission.

J. The Purported Plaintiff Destroys Defendant's Marriage

287. At the urging of Mr. Lee, Mr. [REDACTED] became less attentive and affectionate towards Defendant.

288. Although their first anniversary was approaching, Mr. [REDACTED] was uninterested in making plans to celebrate.

289. When Defendant suggested that they go away for a couple of days, Mr. [REDACTED] refused.

290. Mr. [REDACTED] told Defendant that he could not be away from the Purported Plaintiff because the apocalypse was coming soon and he needed to be ready.

291. On their anniversary, Mr. [REDACTED] still had not committed to any plans, and spent most of the day at the Purported Plaintiff.

292. On or around that same day, the Purported Plaintiff selected Mr. [REDACTED] to participate in an intense study program.

293. That program required Mr. [REDACTED] to be at the Purported Plaintiff every day for a month until very late, and all day on Sundays.

294. The Purported Plaintiff generally does not select people for that program until they have been in World Mission for significantly longer than Mr. [REDACTED] had been at the time.
295. The Purported Plaintiff selected Mr. [REDACTED] for that program in order so that he would not be able to spend any more time with Defendant.
296. Not only did the Purported Plaintiff keep Mr. [REDACTED] until midnight every night, but it then required Mr. [REDACTED] to stay up reading World Mission books until almost two o'clock in the morning.
297. The Purported Plaintiff also required Mr. [REDACTED] to wake up at five o'clock in the morning to engage in activities that the Purported Plaintiff had assigned him.
298. By doing all of this, the Purported Plaintiff kept both Defendant and Mr. [REDACTED] deprived of sleep.
299. As a result, both Defendant and Mr. [REDACTED] became exhausted and fatigued, which placed a further strain on their relationship.
300. Finally, Mr. [REDACTED] moved out of the marital home permanently, and filed for divorce.
301. Mr. Lee would make suggestions to Mr. [REDACTED] to urge Mr. [REDACTED] to divorce Defendant, or to speed up the divorce proceedings.
302. For instance, Mr. Lee would ask Mr. [REDACTED] "Are you divorced yet?"
303. Mr. Lee would ask that of Mr. [REDACTED] in order to send Mr. [REDACTED] the message that Mr. Lee expected Mr. [REDACTED] to divorce Defendant.

K. The Purported Plaintiff Attempts to Coerce Defendant Into Signing a Non-Disclosure Agreement

304. Mr. Lee arranged a meeting on April 22, 2011 with Defendant to discuss the statements that she had posted to the Internet.
305. At that meeting, Mr. Lee presented Defendant with an NDA.

306. Mr. Lee asked Defendant to sign the NDA.
307. Mr. Lee pressured Defendant to sign the NDA.
-
308. Mr. Lee lied to Defendant by claiming that the purpose of the NDA was to protect Defendant.
309. Mr. Lee explained to Defendant that World Mission would agree not to say anything bad about Defendant if Defendant would agree not to say anything bad about World Mission.
310. Defendant was shocked by this, because she had not done anything wrong. There was nothing bad for World Mission to say about her.
311. Moreover, the NDA actually did not contain a clause that would prohibit World Mission from saying anything bad about Defendant. It only prevented Defendant from saying anything bad about World Mission.
312. Defendant requested that Mr. Lee show her the "evidence" that it had showed Mr. [REDACTED] regarding the critical statements she had posted.
313. Mr. Lee refused to produce any such evidence.
314. Mr. Lee then accused Defendant of posting critical statements about World Mission to the anti-cult website, RickRoss.com.
315. Again, Defendant asked Mr. Lee to produce some proof, and he refused.
316. Mr. Lee said he would not show Defendant the proof until she signed the NDA.
317. Defendant refused to sign the NDA.
318. Mr. Lee continued to pressure Defendant to sign the NDA, implicitly threatening to defame her if she did not sign it.

319. Mr. Lee began making excuses as to why he wanted Defendant to sign the NDA. For instance, Mr. Lee said he was concerned that Defendant might steal World Mission's intellectual property, such as the materials for the Basic Studies.
320. Yet, the Basic Study material is already publicly available on World Mission's website.
321. Mr. Lee tried to intimidate Defendant.
322. Mr. Lee told Defendant that in the past he had sued people for criticizing World Mission.
323. Mr. Lee told Defendant that he would sue her if she did not sign the NDA.
324. Mr. Lee admitted to Defendant that in the past there had been a problem with "several people" who were "exposing everything."
325. Mr. Lee then said that if Defendant was "one of them then you got trouble."
326. Mr. Lee would not allow Defendant to take a copy of the NDA with her to show a lawyer before signing it.
327. Mr. Lee continued to refuse to show Defendant the evidence of what she had posted.
328. When Defendant asked Mr. Lee how he could know that she was the one who had posted the statements, the answer she received was that the Purported Plaintiff had requested Defendant's IP address and email address from the forums containing the posts, and that the forums provided the Purported Plaintiff with all of the information that the Purported Plaintiff requested.
329. In fact, internet companies do not generally provide that kind of information without a court order or subpoena.
330. Mr. Lee lied to Defendant about how he uncovered Defendant's identity in order to prevent Defendant from learning that the Purported Plaintiff had established fake anti-cult websites.

331. Mr. Lee lied to Defendant about how he uncovered Defendant's identity in order to prevent Defendant from learning that the Purported Plaintiff had illegally hacked into her Internet accounts.
332. At the April 22, 2011 meeting, Mr. Lee told Defendant that she was no longer welcome to return to World Mission.
333. Thus, on April 22, 2011, Defendant left the Purported Plaintiff for good.
334. Defendant left the meeting having refused to sign the NDA.
335. Subsequently, the Purported Plaintiff began showing pictures of Defendant to members of the Purported Plaintiff, and instructing the members not to have any communication with Defendant.

L. Defendant Posts the Five-Part Story

336. After the April 22, 2011 meeting, Defendant did more research into the World Mission Enterprise, and began to uncover more facts.
337. Defendant subsequently posted more statements to the Internet.
338. Defendant eventually posted the Five-Part Story, attached hereto as Exhibit 1. All statements made by Defendant in the Five-Part Story are incorporated by reference as if set forth fully herein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

(Lack of Power to Sue)

339. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

340. As alleged herein, the Purported Plaintiff is not a true independent corporation and has no authority to manage its own affairs. Rather, the Purported Plaintiff is an alter ego of World Mission South Korea, an organization that is based in South Korea and which manages the world-wide World Mission Enterprise.
341. World Mission South Korea does business in New Jersey through the sham corporation that has presented itself in this lawsuit as the Purported Plaintiff.
342. World Mission South Korea is the only entity on the plaintiff's side of this case that has the authority to manage or settle this lawsuit.
343. The Purported Plaintiff has no authority to manage or settle this lawsuit.
344. To the extent that the Purported Plaintiff has the authority to manage or settle this lawsuit, that authority has been borrowed from World Mission South Korea. Such authority is granted only at World Mission South Korea's pleasure, and such authority can be revoked by World Mission South Korea at any time.
345. The Purported Plaintiff is not a true independent corporation.
346. The Purported Plaintiff has no separate legal existence of its own.
347. Therefore, the Purported Plaintiff has no power to sue, and the case must be dismissed.

SECOND AFFIRMATIVE DEFENSE

(Lack of Standing Generally)

348. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
349. The Purported Plaintiff is not the true party in interest in this lawsuit.
350. The Purported Plaintiff is an alter ego of World Mission South Korea.

351. World Mission South Korea does business in New Jersey through the sham corporation that has presented itself in this lawsuit as the Purported Plaintiff.
-
352. World Mission South Korea is the true party in interest in this lawsuit.
353. Because the Purported Plaintiff does not have its own separate legal existence, it is not capable of suffering a cognizable injury.
354. World Mission South Korea is the only entity on the plaintiff's side of this case capable of suffering a cognizable injury.
355. World Mission South Korea is the only entity on the plaintiff's side of this case that could have standing to bring this lawsuit.
356. Yet, World Mission South Korea is not alleging that it has suffered any injury as a result of the challenged statements.
357. Therefore, neither World Mission South Korea nor the Purported Plaintiff have standing to sue, and the case must be dismissed.

THIRD AFFIRMATIVE DEFENSE

(Failure to State a Claim)

358. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
359. Based on the allegations in the Second Amended Complaint, the facts alleged herein, and the facts to be obtained in discovery, the Purported Plaintiff has failed to state a claim upon which relief can be granted.

FOURTH AFFIRMATIVE DEFENSE

(SLAPP Suit Defense)

360. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
361. This lawsuit is a SLAPP suit - a "Strategic Lawsuit Against Public Participation."
362. SLAPP suits are part of a nationwide trend in which large commercial interests utilize litigation to intimidate citizens who otherwise would exercise their constitutionally protected right to speak in protest against those interests.
363. The goal of such litigation is not to prevail.
364. Rather, the goal of such litigation is to silence or intimidate the target.
365. Another goal of such litigation is to cause the target sufficient expense so that he or she would cease speaking out.
366. SLAPP suits are an improper use of our courts.
367. The Purported Plaintiff has brought this frivolous SLAPP suit for the sole purpose of silencing Defendant's legal and truthful criticisms of the World Mission Enterprise and the Purported Plaintiff.
368. Therefore, this lawsuit is barred as a matter of New Jersey's public policy against SLAPP suits.

FIFTH AFFIRMATIVE DEFENSE

(Statutes of Limitations)

369. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
370. The Purported Plaintiff's claims are barred because of the Purported Plaintiff's failure in the Second Amended Complaint to plead the dates on which the challenged statements were published.
371. The Purported Plaintiff's claims are barred because of the Purported Plaintiff's failure to produce evidence of the dates on which the challenged statements were published.
372. Alternatively or additionally, the Purported Plaintiff's claims are barred because, based on evidence to be obtained in discovery showing the dates on which the challenged statements were published, the applicable statutes of limitations expired prior to the filing of this case.
373. Furthermore, the Purported Plaintiff is not entitled to receive the benefits of equitable tolling for any prior litigation, because based on the facts alleged herein and additional facts to be obtained in discovery, all such prior litigation was commenced and prosecuted in bad faith.

SIXTH AFFIRMATIVE DEFENSE

(Lack of General Damages and/or Causation)

374. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

375. The Purported Plaintiff has not been damaged in the manner or to the extent alleged.
376. If the Purported Plaintiff has been damaged, any and all damages sustained by the Purported Plaintiff were the result of the acts, negligence and/or omissions of the Purported Plaintiff, as alleged herein and as will be further uncovered by additional investigation and discovery.
377. Alternatively, or additionally, if the Purported Plaintiff has been damaged, any and all damages sustained by the Purported Plaintiff were the result of the acts, negligence and/or omissions of third persons or parties over whom Defendant exercised no control, supervision, or dominion and for whom Defendant is not responsible, as alleged herein and as will be further uncovered by additional investigation and discovery.
378. Alternatively, or additionally, if the Purported Plaintiff has been damaged, the Purported Plaintiff has not suffered any damages that were proximately caused by any act or omission of Defendant.

SEVENTH AFFIRMATIVE DEFENSE

(Mitigation)

379. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
380. The Purported Plaintiff's claims are barred or limited by its failure to mitigate its damages, if any.
381. Defendant is entitled to set-off any collateral source benefits paid or payable to the Purported Plaintiff.

EIGHTH AFFIRMATIVE DEFENSE

(Comparative Fault)

382. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
383. The Purported Plaintiff's damages, if any, must be reduced according to its percentage of comparative negligence or fault assessed pursuant to N.J.S.A. 2A:15-5.3.

NINTH AFFIRMATIVE DEFENSE

(First Amendment Privilege)

384. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
385. Defendant's speech and related conduct was privileged and protected under the First Amendment to the United States Constitution.

TENTH AFFIRMATIVE DEFENSE

(Incremental Harm Doctrine)

386. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
387. The challenged statements were published alongside other statements that the Purported Plaintiff does not challenge.
388. The challenged statements caused no damage to the Purported Plaintiff beyond the damage, if any, caused by the unchallenged statements.

389. Therefore, the challenged statements are not actionable pursuant to the incremental harm doctrine.

ELEVENTH AFFIRMATIVE DEFENSE

(Subsidiary Meaning Doctrine)

390. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

391. The challenged statements were published alongside other statements that the Purported Plaintiff does not challenge.

392. The challenged statements state or imply the same ultimate facts or conclusions as the unchallenged statements.

393. The challenged statements are merely an outgrowth of the unchallenged statements.

394. The challenged statements are subsidiary to the unchallenged statements.

395. Therefore, the challenged statements are not actionable pursuant to the subsidiary meaning doctrine.

TWELFTH AFFIRMATIVE DEFENSE

(Defamation-Proof Plaintiff Doctrine)

396. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

397. At the time the challenged statements were published, the Purported Plaintiff already had a severely damaged reputation with respect to each of the traits discussed in the challenged statements.

398. Alternatively, or additionally, the Purported Plaintiff published two fake anti-cult websites, including the Cult Watch Site, which damaged the Purported Plaintiff's reputation with respect to each of the traits discussed in the challenged statements.

399. Therefore, the Purported Plaintiff is defamation-proof, and its claims are barred pursuant to the defamation-proof plaintiff doctrine.

THIRTEENTH AFFIRMATIVE DEFENSE

(Lack of Challenged Statements)

400. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

401. Defendant is not liable for defamation or false light invasion of privacy because the challenged statements do not exist and have never existed.

402. Alternatively, or additionally, Defendant is not liable for defamation or false light invasion of privacy because the challenged statements do not say and have never said what the Purported Plaintiff alleges they say.

FOURTEENTH AFFIRMATIVE DEFENSE

(Public Records)

403. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

404. Defendant is not liable for defamation or false light invasion of privacy to the extent that the challenged statements are based on information contained in public records, such as the tax filings and corporate filings of World Mission and related entities.

FIFTEENTH AFFIRMATIVE DEFENSE

(Of and Concerning)

405. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
406. Defendant is not liable for defamation or false light invasion of privacy to the extent that the challenged statements are not of and concerning the Purported Plaintiff.

SIXTEENTH AFFIRMATIVE DEFENSE

(Opinion)

407. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
408. The factual character of a statement is determined by the statement's content and context.
409. As a matter of law, content that is presented in one context as factual may be presented in another context as opinion.
410. Therefore, the presentation of factual allegations in this or any other lawsuit does not preclude the same or similar allegations from being presented as opinions in another context.
411. The challenged statements in this case were posted to Internet websites that are designed for and dedicated to the publication of opinions.
412. Based on the content of the challenged statements and the online context in which they were published, the challenged statements are statements of opinion, rhetorical hyperbole, or otherwise not statements of fact.

413. The challenged statements are not statements of fact, notwithstanding any similarities that the challenged statements have to the factual allegations in this or any other lawsuit.

414. Therefore, the challenged statements are protected as opinions and are not actionable.

SEVENTEENTH AFFIRMATIVE DEFENSE

(Lack of Defamatory Meaning)

415. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

416. The challenged statements, when read in context, lack defamatory meaning.

417. Therefore, the challenged statements are not actionable.

EIGHTEENTH AFFIRMATIVE DEFENSE

(Substantial Truth)

418. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

419. Based on the facts alleged herein, and on facts to be obtained in discovery, the challenged statements are true or substantially true.

420. Therefore, the challenged statements are not actionable.

NINETEENTH AFFIRMATIVE DEFENSE

(Lack of Intent)

421. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

422. Defendant is not liable for defamation or false light invasion of privacy because the Purported Plaintiff is a public figure and Defendant did not act with actual malice.
-
423. Defendant is not liable for defamation or false light invasion of privacy because the issues discussed in the challenged statements are issues of public concern and Defendant did not act with actual malice.
424. To the extent the Purported Plaintiff must prove that Defendant acted with actual malice in order to establish that Defendant is liable for defamation or false light invasion of privacy, the Purported Plaintiff cannot meet its burden because Defendant did not have knowledge of the falsity of her statements, and did not act with reckless disregard as to the falsity of the statements or the light in which the Purported Plaintiff would be placed.
425. To the extent the Purported Plaintiff need not prove that Defendant acted with actual malice in order to establish that Defendant is liable for defamation or false light invasion of privacy, the Purported Plaintiff cannot meet its burden because Defendant acted at all times with reasonable care, and was not negligent.
426. Therefore, Defendant is not liable for defamation or false light invasion of privacy because she lacked the requisite intent.

TWENTIETH AFFIRMATIVE DEFENSE

(Lack of Standing Specific to Corporation Suing for Privacy Torts)

427. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
428. The Purported Plaintiff is a corporation.
429. Corporations have no standing to sue for invasion of privacy.

430. Therefore, the Purported Plaintiff's claims for false light invasion of privacy are barred.

TWENTY-FIRST AFFIRMATIVE DEFENSE

(Challenged Statements Are Not Highly Offensive)

431. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

432. Defendant is not liable for false light invasion of privacy because the challenged statements are not highly offensive to a reasonable person.

TWENTY-SECOND AFFIRMATIVE DEFENSE

(Lack of Conspiracy)

433. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

434. Defendant is not liable for conspiracy because the alleged conspirators did not agree upon concerted action.

435. Defendant is not liable for conspiracy because to the extent the alleged conspirators agreed on any action, they contemplated a lawful purpose and the use of lawful means to achieve that purpose.

TWENTY-THIRD AFFIRMATIVE DEFENSE

(Consent)

436. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

437. The Purported Plaintiff published two fake anti-cult websites, including the Cult Watch Site.
-
438. The Cult Watch Site accused the World Mission Enterprise of being a "cult."
439. The Cult Watch Site said that the World Mission Enterprise "brainwashed" its members.
440. The Cult Watch Site claimed that the World Mission Enterprise uses deception and subverts the truth.
441. The Cult Watch Site said that the World Mission Enterprise focuses its recruiting efforts on young people, because they "lack critical thinking, experience and are usually far easier to persuade."
442. The Cult Watch Site said that the World Mission Enterprise "robs you of money."
443. The Cult Watch Site said that the World Mission Enterprise "causes rifts in families."
444. The Cult Watch Site said that the World Mission Enterprise has removed a lot of young people from their families.
445. The Cult Watch Site said that the World Mission Enterprise makes new recruits "sleepy."
446. The Cult Watch Site said that the World Mission Enterprise "wants you in a constant state of fear and guilt."
447. The Cult Watch Site said that the local World Mission Enterprise pastors send their local "membership details to the Head Office back in Korea."
448. Each of those statements are the same or substantially similar to one or more of the challenged statements described in the Purported Plaintiff's Second Amended Complaint.
449. Therefore, the Purported Plaintiff consented to having such things said about it on the Internet.

450. Because the Purported Plaintiff consented to having such things said about it on the Internet, the Purported Plaintiff's claims are barred.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

(Unclean Hands)

451. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.

452. The Purported Plaintiff's Second Amended Complaint is barred by the doctrine of unclean hands.

453. As alleged herein, the Purported Plaintiff established two fake anti-cult websites in order to entrap Defendant into revealing her username and password.

454. The Purported Plaintiff then used Defendant's username and password to illegally hack into her other Internet accounts in order to discover her identity.

455. The Purported Plaintiff used the deceptive, unethical, and illegal tactics described herein to uncover Defendant's identity so that it could bring this lawsuit against her.

456. Therefore, the Purported Plaintiff is acting with unclean hands, and should be barred from continuing the prosecution of this lawsuit.

457. Defendant reserves the right to allege that the Purported Plaintiff has committed additional deceptive, unethical, and illegal acts based upon continuing investigation and discovery.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

(Bad Faith)

458. Defendant repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Answer as if the same were set forth herein verbatim and at length.
459. The Purported Plaintiff's claims are barred because they have been instituted and maintained in bad faith.
460. The Purported Plaintiff has no good faith basis, either in fact or law, for the allegations contained in the Second Amended Complaint.
461. The Purported Plaintiff knows that all of the statements made by Defendant are true, or substantially true, such that the Purported Plaintiff has no good faith basis for believing that it can prevail in this lawsuit.
462. Therefore, Defendant is entitled to her attorney's fees, costs of suit and such other relief as the Court deems proper.

RESERVATION OF RIGHTS

463. Defendant reserves the right to assert such additional defenses as may exist based upon new information obtained through continuing investigation and discovery.

WHEREFORE, having fully answered the Second Amended Complaint, Defendant respectfully requests that this Court issue an Order:

- 1) dismissing the Purported Plaintiff's Second Amended Complaint;
- 2) denying any and all relief prayed for by the Purported Plaintiff;
- 3) entering Judgment in favor of Defendant;

- 4) finding that the filing and prosecution of this suit was done in bad faith and in violation of New Jersey's frivolous litigation laws, N.J.S.A. 2A:15-59.1; and Rule 1:4-8;
- 5) awarding Defendant reasonable costs of suit;
- 6) awarding Defendant reasonable attorney's fees;
- 7) awarding Defendant 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.

TRIAL COUNSEL DESIGNATION

Paul S. Grosswald, is hereby designated as trial counsel.

JURY DEMAND

Defendant 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, nor is any such other action or arbitration proceeding currently being contemplated. I further certify at this time that there are no other known parties who should be joined as defendants in the instant action. I further certify that, on information and belief, World Mission South Korea is the true party in interest on the plaintiff's side of the case, and should be joined as a plaintiff, or else there can be no standing or authority for the Purported Plaintiff to sue. I further certify that there is another case involving two of the same parties, the Purported Plaintiff and Ms. Colón, currently pending in this same court, Docket No. BER-L-3007-13. In that case, Ms. Colón is suing the

Purported Plaintiff and related entities and individuals for torts arising out of Ms. Colón's membership in and subsequent defection from the World Mission Enterprise. 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: September 5, 2013

By:


PAUL S. GROSSWALD

Attorney for Defendant,
Michele Colón

EXHIBIT

1



Examining The World Mission Society Church Of God

HOME FIRST STEPS ▾ WHO IS AHNSAHNGHONG? ▾ WHO IS ZAHNG GIL-JAH? EVIDENCE ▾
THOUGHT REFORM

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Former Member Testimony July 22, 2011 9:41 PM

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

[Translate]

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

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

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

The missionary asked me if I thought that I was going to heaven. I answered that I hoped that I would be saved and allowed in to heaven. I mean I thought that I was

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Mission 28

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How The WMSCOG Indoctrinates And Changes A Person's Life - Part 5 of 5 25

"It's not the devil... It's my baby" - A Former Member's Story 18

"The Church With A Small Number of Members Is The

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

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

After I changed back into my normal clothes, I was taken in to another room in the same hallway, to partake in the "Passover bread and wine". I was shown a few verses in the Bible where Jesus said that we must eat his flesh and drink his blood in order to have eternal life. So I said to myself, "who doesn't want eternal life?" and did as I was told.

Then the Deacon brought out this huge book and asked me for my name, address, phone number and next to my info he wrote down the names of my two co-workers.

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

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

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

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

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Former Member Testimony July 21, 2011 10:45 AM

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

[Translate]

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

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

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

For about two months we only attended one of the three services held on Saturdays. I remember being surprised to find out that most members spent their entire Saturday, from about 9 am to 10 pm, in the church attending services and in between, studying the Bible, watching videos (usually about Zhang Gil Jah or disasters), or reading books written by Ahn Sahng Hong and others. I remember asking someone there why it was necessary to spend all of Saturday in the church. The "older sister" replied that

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Story 18

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"God commanded the Sabbath day not the Sabbath hour or one Sabbath service". This topic would be touched upon during services as well. I remember one of the missionaries mentioning that members of strong faith don't question the amount of time you are supposed to spend in the church on the Sabbath. I started to view these subliminal messages during services as ways to suggest feelings of guilt among members. I decided to keep my concerns about this to myself. It didn't take long for the pressure to build, so we started attending two services on Saturdays.

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

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

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

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

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

- True Church" - Joo Cheol Kim 15
- Zahng Gil Jah's Ex-Husband's Side Of The Story? 12
- Ahnsahnghong Vs Scripture 11
- How The WMSCOG Turned My Life Upside Down Part 5 - My Marriage Destroyed - A Former Member's Story 11

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

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Diane July 28, 2011 7:34 PM

I noticed that this organization has many contradictions of the bible. I recently broke up with my boyfriend, who I love dearly because of this church. He had only been attending for 3 weeks and is already so heavily involved in the bible studies and worship service. The doctrine that he is being taught, does not line up to my Christian beliefs. We had plans to attend an event on a Saturday next month and he cancelled on me because he said he would be in church all day. So, I asked him does that mean he will never make himself available to me on Saturdays and he told me he's sorry, but he is not able to make plans on Saturdays. That really hurt my feelings. It's like he's being brain washed. Just because a member shows him scriptures in the bible and explain it in his interpretation of what it means, he believes it. I know many of you are former members of the church. What can I do to help him to understand the real truth? I do want him back, but not as long as we have different spiritual beliefs.

[Translate]

REPLY

admin July 28, 2011 9:21 PM

Hi Diane,

Thank you for your comment. I am very sorry to hear of the situation between you and your boyfriend. I am also very sorry to hear about him getting so heavily involved in the WMSCOG. I imagine you have probably already seen him progressing along the 20 steps of indoctrination. The best thing I can offer you besides the articles in our Evidence section is to join the Former Members World Mission Society Church of God Facebook group where you can speak with other people in similar situations. They will be able to best help you navigate the back-and-forths you will experience as you move forward in trying to get your boyfriend to follow Jesus Christ.

[Translate]

REPLY

A Shopping Mall

A Christian Response to the World Mission Society Church of God

Women and Religious Cults - WE TV Documentary

Cult Explosion: Cults Exposed By Those Who Escaped

Diane July 31, 2011 2:00 PM

Today I sent my guy encouraging scriptures because he is going through a difficult time financially. He told me to stop sending him things on religion. I was a bit shocked by his comment since we are both Christians. Now, since he attended bible study with me at my church this past week, he is telling me I frown upon his religion and will not attend a bible study with him. It's interesting how he calls it his religion if we both supposedly study Christianity. Even though I broke it off with him recently, we got back together. Religious differences is seriously a deal breaker for me, regardless of how much I care for him. Should I attend one of these bible studies since he came to mine? I honestly don't want to go and I don't know how much longer we'll be together. He even challenged me about not following the Sabbath and the fact that I attend church on Sundays. I feel sick in my stomach just thinking about sitting through hours of the teaching at his church.

[Translate]

REPLY

MountainMorn July 29, 2011 10:59 AM

Diane, I am so sorry this church has control over your boyfriend. Educate yourself all you can on this group, keep contact with him, and hopefully, you will be able to get him to look at some information eventually. People do get discouraged, people do open their eyes to their manipulation. There is hope. My son has been in three years, but he did make what I consider a huge admission to my husband yesterday. He actually confirmed that some people in the church are not happy. He would never admit that before, and I know that they always have to put on the fake "happy face" no matter what while they are there. My son definitely isn't happy. Hang in there with your boyfriend. There are success stories.

[Translate]

REPLY

Diane July 31, 2011 10:39 AM

Thanks for the feedback. I will continue to try to shed some light in his life and be a positive example of how to live a Christ led life. Maybe then he will see my happiness & prosperity and come to church with me more. It's hopeful thinking. I just don't want to leave him in darkness.

[Translate]

REPLY

lucitania May 14, 2012 4:54 PM

no es un comentario es una realidad hace un año precisamente en junio 2011 mi hijo que se encuentra en España fue abordado por una hermana que le hablo justamente de la Iglesia de Dios Sociedad Misionera Mundial y se bautizo en menos de una hora ,me llamo para decirme que se había bautizado y que no me molestara y le conteste que si esa era su decisión yo no podía hacer nada ni decir nada , en Junio del 2011 renuncio a su trabajo por ir a ver en persona a Dios Madre Jerusalem, en Corea, pero le han hecho tal lavado de cerebro los hermanos que están a su alrededor que el no se da cuenta de nada, mañana tarde y noche tiene que estar en la iglesia los hermanos que son mayores que mi hijo han hecho de él un muñeco de trapo que lo dominan a su antojo ,lo envían hacer cualquier trabajo y el lo hace sin chistar dice que es la decisión de madre, no quiso estudiar y aún no consigue un trabajo por que supuestamente para el, Dios Madre tiene una misión especial que yo no se cual sera , la verdad de todo ha pasado ya un año y el no consigue trabajo no quiere estudiar y el fue con esa finalidad ya que tiene 24 años , esta separado de la familia y sobre todo de su hermano de sangre que vive allá también , comenzó el a hablarme de la iglesia y un día decidimos mi hija y yo bautizarnos pero con el pacto de que el estudiara y procurara encontrar nuevamente trabajo , porque mi preocupación era que no tuviera sus alimentos y mas que eso que no tuviera donde cobijarse sobre todo en un país extraño donde nadie que a uno no le conozca da la mano , el pacto que hicimos se le olvido y me djo que lo que el quería hacer era viajar por todo el mundo predicando y decir que el mundo se va a acabar y que teníamos que creer que esta era la iglesia verdadera, y yo le dije y el pacto que hicimos de que tendrías que estudiar y buscar un trabajo me djo que como el mundo ya se iba a acabar había que salvar nuestra alma para Dios Ahnsahngong y Madre Celestial, pasaron unos meses y comencé a visitar la iglesia con mi hija me preocupe que teníamos que entrar descalzas a la iglesia y que los hombre y las mujeres se tenían que

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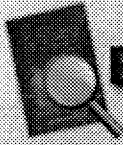
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Former Member Testimony July 25, 2011 11:06 PM

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

[Translate]

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

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

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

A few months before the wedding, one of my friends sent me an email that refuted the WMSCOG's claim that Constantine abolished the Sabbath. This email had been bugging me for a few months and now that I had some time to think, I decided to do some research on the topic. I thought that it would be great to find some information that supported what I was taught during my first study about the Sabbath at the WMSCOG. I had trouble finding information in bookstores so I finally turned to the internet. I had avoided the internet after having heard that the internet was evil and considered by the WMSCOG to represent the modern day "tree of knowledge of good and evil" [\[more info on this\]](#). A simple google search and I was lead to an article titled "Did Constantine Abolish The Sabbath In 321 AD?" [For our readers, she is referring

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[How The WMSCOG Indoctrinates And Changes A](#)

[Person's Life - Part 5 of 5](#) 25

["It's not the devil... It's my baby" - A Former Member's](#)

[Story](#) 16

["The Church With A Small Number of Members Is The](#)



to [this article](#)). I was shocked to find out that Christians had been worshipping on Sunday long before Constantine was even born. So Constantine didn't abolish the Sabbath did he? The WMSCOG's studies that I thought were rock-solid seemed to be starting to crumble one at a time.

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

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

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

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

I remember asking the pastor why members in the WMSCOG had separated from their non-believing spouses. After all, the girl who recruited me had just left her husband because he decided to stop attending the church. I pointed out how in 1 Corinthians 7, the apostle Paul states that married members of the church should not separate from their non-believing spouses. The pastor explained that the church does not encourage divorce, but instead encourages married couples to stay together. So again I asked, if this is true then why are there so many divorced or separated members? He explained that the members had no choice but to leave their spouses because of the persecution they received. He went on to explain that the non-believing spouses usually had a problem with how much time the member spent in the church and usually would end up trying to make the member choose between the church and the marriage. The deaconess sitting to my right went on to explain that she divorced her husband due to

True Church" - Joo Cheol Kim 15

Zahng Gil Jah's Ex-Husband's Side Of The Story?

12

Ahnsahnghong Vs Scripture 11

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

11

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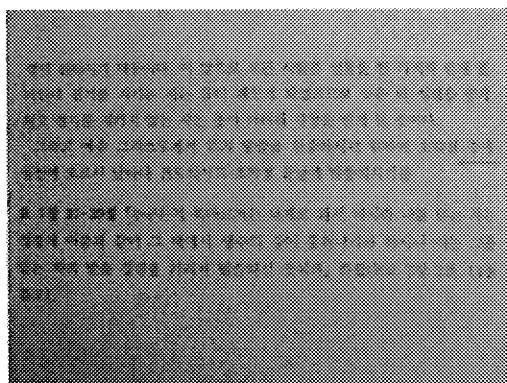
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Personal Experience With WMSCOG Recruiters At

similar circumstances and that her husband had also committed adultery. It is important to point out that she had never once mentioned that her husband had committed adultery to me before. The other times that she had discussed leaving her husband with me, her reasons were that he had tried to stop her from tithing and attending the church as often. I thought, how convenient.

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



I was determined to find out the truth about this alleged "mistranslation". A few days later, I asked my husband to drive me to a nearby town where many Korean folks live. I know it sounds crazy but I had to know. I approached random Korean people on the street and asked what the underlined word () meant. Some just pretended that they didn't speak English probably because they thought I was trying to recruit them. Some didn't know enough English to tell me what the word meant. Some were too Americanized and didn't know enough Korean to read the word and tell me what it

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meant. I was becoming frustrated because it was around midnight at this point and I still hadn't found anyone to help me with the translation. I had just about given up when I found a couple in a diner that was willing to talk to me after I started the conversation with "I'm not trying to preach to you, I just need to know what this Korean word means in English". The gentleman that was willing to look at the book told me that the underlined word () meant "during" and not "middle". He also pointed to a word in the next line that said "every day" (). That meant that there was no error in the translation! Ahnsahng hong really did write that Jesus preached every day during the feast... I was completely shocked!!! That meant that the pastor lied to me. I couldn't believe that he would lie to me just to placate me.

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

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

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

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

www.examinethewmscog.com.

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Former Member Testimony July 29, 2011 12:31 AM

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

[Translate]

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

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

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

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

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Religious Groups in Korea 27

Mission 28

The WMSCOG's Failed Doomsday Predictions of 1988, 1999, and 2012. What Will They Predict Next? 28

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"It's not the devil... It's my baby" - A Former Member's Story 18

"The Church With A Small Number of Members Is The

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

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

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

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

True Church" - Joo Cheol Kim 35

Zahng Gil Jah's Ex-Husband's Side Of The Story?

12

Ahnsahnghong Vs Scripture 11

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

11

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

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

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

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

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

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

I asked the deacon to explain what parts of the comments that he read in his opinion, were lies? He said "the part about him being brainwashed". He explained that everyone is entitled to their opinion, but their opinion may be a lie. They refused to tell me what website these comments came from. The deacon would explain that these comments had been posted on "some forums" with my personal email address. Then he proceeded to accuse me of posting links to other websites about the church on RickRoss.com. Again I asked for the pastor and the deacon to please show me where

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they obtained the information. The deacon then asked, "Would you like to sign this before I show you?". I declined to sign the non-disclosure agreement and again requested that I be shown proof of the accusations being made against me. The deacon then insisted that I read the agreement in front of me. The pastor explained "it's nothing it's like we protect each other". I still didn't understand why I needed protection. Why would I need protection from the World Mission Society Church of God? I read the agreement and it basically said that I could not discuss anything that I read, studied, or heard in the church with anyone except my husband. I do not recall the agreement containing any statements to guarantee that the church would not "say anything bad" about me as stated earlier by the deacon. The pastor said, "What if someone bad mouth your personal life do you like it?" Was this a threat to defame me?

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

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

During this meeting, the pastor and deacon mentioned more than once that they were not trying to cause problems between my husband and I. If that was true, why would they confront my husband with this so called "evidence" days prior to having my husband notify me? But later the pastor said that in this situation if my husband read these comments and found out that I was the one that posted these comments "how can you be together like that?" It seemed pretty obvious to me that their intention was

to cause division between my husband and I. My husband had already made up his mind when they confronted him days before this meeting. He viewed my refusal to sign the non-disclosure agreement as an admission of guilt. But I explained to my husband that I was under no circumstances going to sign away my right to free speech. Why would a church want to silence one of their former members?

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

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

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

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MountainMom July 29, 2011 10:52 AM

This is exactly the type of thing they have done to divide my son and his wife. She is a non-believer, so they kept him at church all they could, week after week till midnight or even later. It makes me feel like they think there were doubts in his mind, and they use this tactic all the time to stymie those doubts and the voice of reason. I think this would qualify as "alienation of affection" which is against the law in Illinois. I wonder if they know that.

[\[Translate\]](#)



Nicholas August 2, 2011 12:20 AM

Hi I've been reading this site and another about this Church for a while now. To start off, I was never a

member of this church. By the time I met members of this church, I had already been attending another church for two years and I'm very happy with it. But I want to give a testimony for this site, to help anybody that has been a victim of this church.

To start off, I've been going to school at a campus for the last few years and it was a few years ago that I decided to accept Jesus as my Lord and Savior and I've been going to a church that I really love. With that said, I had been living a lukewarm Christian life since I asked Jesus to save me. I had made many attempts to strengthen my Christian life and was met with many failures, I would never read my bible or pray and was more interested in the things of the world. The situation for me is now different and I'm making a serious effort in my relationship with Jesus. This was the year that I had a big wake up call that would make me want to know the word of God. It wasn't a wake up call that I would consider to be a good experience but one that opened my eyes. Like I said before I had been going to school for a while now and one day after taking care of business and was on my way to my car to drive home I saw this guy and girl standing near the library and they stopped me. This is where my experience with the WMSCOG started. The encounter started with introductions and then the guy asked me if I knew about God the Mother. Naturally I said no and then after a few minutes of chatting we decided to do Bible study right at the library of the school. We sat there talking for 15-20 minutes and he spent that time explaining to me God the Mother and showing verses in the Bible that at a glance, seemed to support their beliefs. It's worth noting that I was skeptical from the getgo and when I was being taught about God the Mother I wasn't sure if I should buy into it or not because this guy seemed very smart and seemed to know the Bible very well. But as I said before, I was living a lukewarm Christian life and I thought maybe if I went did some Bible study with some new faces on the side it would help motivate me so I would start taking my faith seriously.

After a bit of time at the library their group had decided to go back to the church and they invited me up there to do some more Bible study so I drove over there with someone riding with me and leading the way. When I got there I was introduced to some of their members and they all seemed like nice and friendly people. I was then led into a room that pretty small and then another guy came in and was going to teach me about what his church believes. The Bible study lasted for about 2-3 hours. We talked about many different topics such as God the Mother, the Passover, parallels between Adam and Eve and the fall of Lucifer, our souls existing before we were born, everyone coming from the dust, the meaning of Elohim, and many other issues. Now when I waked out that particular day I thought to myself that even though I didn't agree with what a lot of what they said I thought maybe there was some room to understand and I agreed to go back the next week. That night I had went over to my friend's house, I go to church with these people and they have supported me throughout my spiritual journey. I had told them about my experience earlier in the day and initially they were happy that I had this opportunity but then they saw something wrong when I brought up God the Mother. I referred to those verses in Genesis ("let us make man in our image") and Revelation ("the Spirit and the Bride") but they weren't too enthusiastic about these beliefs. My friend admitted to me later that he was nervous about me in relationship to this church and on all counts, he was right. I didn't quite see it at that moment but the second time I did Bible study is where things took a turn. After the weekend, I went to school on Monday and afterwards I drove back over to the church.

This time when I did Bible study, I did it with the guy that I met at the beginning when I was at school. When I got there, before we did the Bible study they showed me an introductory video about their church which seemed very positive like but my experience during that bible study told a different story. This time we talked about issues like the Sabbath, how we're saved, what happens to babies, God the Mother the passover, communion, repentance and other topics. I had asked about the end times and Anti-Christ but he wasn't far enough into his studies to teach me about it and then if I came back another day someone else could teach me. This time I did Bible study, they really sent me on a guilt trip and I felt like I was being severely condemned for not doing the things they do. Throughout the Bible study, I became extremely frustrated and even wanted to curse him out. But God kept my strong throughout it all and I kept my composure. To make a note, I go to church on Sunday and with my limited knowledge I did know that in the old testament they worshipped on Saturday. But that 3-4 hours I was there this time was a lot of him trying to get me to submit to the way of his church and trying to scare me. His attitude was inappropriate, after a while of talking to the Sabbath he would make remarks like "And YOU go to church on SUNDAY?!" and that people who didn't keep the Sabbath would be the ones that Jesus would say "Depart from me!" There was such a strong emphasis on the Passover as well. He kept saying this was the only way my sins would be forgiven. The Bible studies this church does seem very systematic and it doesn't seem the members can speak for themselves but only what their leaders want them to teach. I thought maybe this was just me dealing with this but after reading many testimonies and

watching videos of people who had experiences with this church, it wasn't just me. One thing that I was very curious about was what happened to babies when they died? The answer I got was an answer that shocked me and ultimately made me walk away after that day. To hear him say that if babies don't keep the Passover they'll go to hell really pushed my buttons. I tried to argue with him on this matter but it was hopeless, I simply did not read enough of the bible up to this point to support what I said. He trapped me many times during the study, saying stuff like "Show me in the Bible where it says to take communion!" "or show me where it says to repent!" My efforts were hopeless. Initially I agreed to do another bible study but I just didn't feel right about it anymore. I left their church that day feeling lower than dirt and feeling like I failed as a Christian. I feel God used this event I saw a curse and turned it ultimately into a blessing. After talking to my friend and his father about this whole ordeal, they offered up their support and love and the father offered a parting word by advising me to read Galatians. I ended that day certain of a few things, that I didn't need to be involved with the WMSCOG and that I can find the truth on my own through the faith and love of Jesus Christ and so the time came that I would really started reading the Bible and getting to know God's word. I sent the guy I did Bible study a text and ended the relationship. Since that day, I have talked to a few more people from that church on campus and each time I rejected any further offers to do bible study. I've even tried to argue with them regarding what they teach and was met with hostility from its members and accusations that I just don't want to know the truth. But God has better plans for me, I don't want to argue with these people but I want to instead love them and forgive them.

I want to offer a word to the people who have encountered this church. No matter what happens, always trust in Jesus Christ. He is the truth, the way, and the life. He will never leave you nor forsake you. Since this whole experience I've learned of real peace that I could only receive through the love of Jesus. Following the conclusion of my experience, I started to take everything about my faith seriously and decided to start reading my bible all the time and praying to God every day. I put my trust in Jesus Christ and he has not let me down. I'm not perfect, but I know God is doing a work in me and I know he can do a work in you too. For anyone who has had an encounter with this church, I understand completely they have taken over peoples lives and hurt others but we shouldn't hold that against them. God forgave us through his son Jesus Christ and we should extend that same love and forgiveness to others regardless of what church they're part of or what they believe in. Remember that we cannot change the way they see things but God can. Nothing is impossible for him. I just encourage you to pray for these people so that they can know the real love of the man I call Lord and Savior: Jesus Christ.

I hope this testimony encourages anyone reading it, remember you always have a friend in Jesus. God Bless You.

[Translate]

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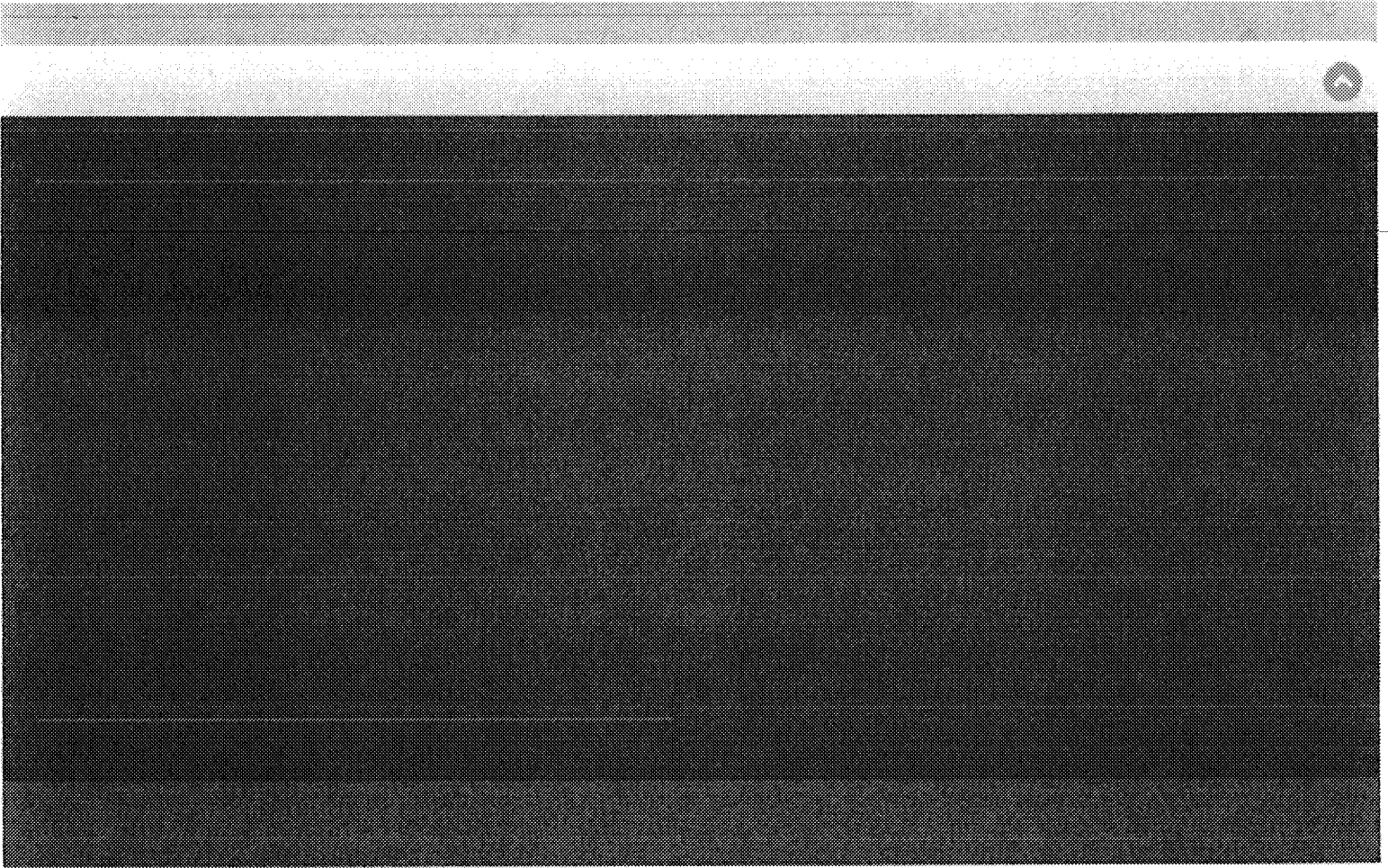
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Former Member Testimony August 2, 2011 9:40 AM

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

[Translate]

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

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

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

The next day, my husband took me out to dinner and gave me a card in which he wrote that we had enough love to make it through. Just when I thought that things between us would get better, he informs me that he had been recently chosen to participate in an intense Bible study training course where he would learn to teach 30 subjects in 30 days. That would mean that he would spend every day in the WMSCOG until very late at night and all day Sunday being tested from 9am to 6pm in the afternoon. I thought that it was pretty convenient that he would be "chosen" for this "intense training" that would make it nearly impossible for us to see each other, not too long after I was kicked out. The goal of this training sounded unrealistic and seemed like a ploy to set members up to fail. Why not set unattainable goals for your members to keep them focused, working hard, and feeling guilty and inadequate when they can not meet your

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demands?

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

My husband had always told me that he wanted to have children and start a family.

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

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

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

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

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

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

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

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MountainMom August 2, 2011 10:20 AM

This is exactly like what has happened to my son and his wife due to his involvement in the COG. They do everything they can to cause trouble in marriages where one is a member and one is not. In cases where the two are only engaged, they break them up and then suggest that the member immediately get involved with someone else in the church for their "spiritual growth." I wonder if they do this with the Korean members in order to get them U.S. citizenship. Also, being married to a member makes it harder to leave the church. They have this all thought out, don't they.

[Translate]

REPLY

nick August 3, 2011 12:53 AM

I understand it can seem strange [this debate moved to the forum by admin at this thread]

[Translate]

REPLY

Jesus is the Only way August 3, 2011 12:48 AM

This is horrible. My girlfriend goes to this church and made about a year this month. Thanks to the help of this former member's story and her evidence of their falseness I am trying my best to show the members and my girlfriend that this is a business. The word of life is free and God dwells within you not a worldly "Church of God." Im sure me and my girlfriend are done with since she hasn't responded to my phone calls or text messages. Even if she does answer I am going to tell her that their is only One God and the only person that is coming back is Jesus Christ. God bless all that have been tricked by these false prophets and may the truth be told. Amen!

[Translate]

REPLY

ed March 8, 2012 5:11 AM

Ask her this question. If mother god represents sarah, who is the jerusalem from above and came to this earth. then she would have to have SEX? with her son Isaac to be your spiritual mother because you are supposed to be Isaac's seed the seed of promise the 144,000.

[Translate]

REPLY

Alonna August 3, 2011 1:47 AM

I can't believe he left you. I can't believe the WMSCOG would do that to someone. They're slowly taking over this guy's life. Every day I pray to GOD and I thank him and my family for helping stay away from this cult. The church still contacted me today, but I never answer. It's weird they still contact me and it's

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been months since I left the cult. This ending brought tears to my eyes and can't bare seeing my love one choosing which is basically a lie over me. I hope you stay strong, if GOD plans for you guys to get back together it will happen just be patient.

[Translate]

REPLY

ed March 8, 2012 5:30 AM

God bless you I am right there with in that mess and now my mind is on my children. you will not believe what they have been saying about me and my soon to be x wife does not even know what they have done to her. I pointed things out and she did not want to hear about what I was seeing and being put through and she is mostly respons ble for it. church duties came before work and family. Any thing I did including work prevented her from serving was a reason to fight. Its because they are taught anything that stops you from serving comes from the devil and thats how she saw it and the church has taken it way beyond that now. I stopped going and paying tithes after 15 years because the church got into my marriage that got me singled out and they would tell people to stay away from people and spreads lies about you. It's all part of the separation process.

[Translate]

REPLY

admin November 11, 2011 1:07 AM

Here is a verse for the husband in the above story:

"If a man has recently married, he must not be sent to war or have any other duty laid on him. For one year he is to be free to stay at home and bring happiness to the wife he has married." Deuteronomy 24:5

I hope he thinks about this verse the next time he asks someone if they "believe the Bible".

[Translate]

REPLY

GodIsGreat March 2, 2012 12:24 AM

Just been to my first b ble study today. And boy, the preacher and pastor/deacon (whoever they were) wanted me to be baptized. But something was telling me not to. Told them I had some reservations and didn't want to be baptized on my first Bible study. Went home and spent 2 hours online and came across this.

To the writer of this blog, you have my prayers tonight and the times I pray. God has kept you strong for you have trusted in Him your life. He will never forsake you. We must realize that everything happens for a reason. And before something happens, God, the almighty God has already planned everything for us. It's ALWAYS a blessing. And we sometimes forget to see that even hardships are blessings in disguise.

Commit to the Lord whatever you do and your plans will succeed. (I read this from the Bible and it has been engraved in my heart and spirit since).

[Translate]

REPLY

admin March 2, 2012 7:59 AM

Amen! Thank you GodIsGreat.

[Translate]

REPLY

eye for an eye March 8, 2012 5:01 AM

godisgreat want to go in and examine them. their doctrine has changed and they use a separation process on people in there message of salvation. Did you hear this when you studied? "you hear the words of god because you belong to God. And the reason other people don't hear is because they belong to the devil."

[Translate]

REPLY

No Name March 16, 2012 9:24 AM

Mwhole family , that is . my mum, dad and my two sblings are all devoted members of this cult. The have tried every trick written in the book to try and get me into the cult but to no avail. I have decided to stay away from them until they come back to their senses but at the same time feel isolated and lonely without them. I cant compromise my christian beliefs. To me 'Mother' and the whole system is js crap!

[Translate]

REPLY

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- July 2011 (2)
- June 2011 (1)
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- April 2011 (1)
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