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Law Division

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Attorney for Plaintiff,  
**Michele Colón**

MICHELE COLÓN, a New Jersey resident;

Plaintiff,

- against -

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

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO. 3007 - 13

**RECEIVED**

Civil Action APR 19 2013

SUPERIOR COURT OF NEW JERSEY  
COUNTY OF BERGEN  
FINANCE DIVISION

**COMPLAINT**

**JURY DEMAND**

Plaintiff Michele Colón (the "Plaintiff"), by and through her attorney, Paul S. Grosswald,

by way of Complaint against the above-named Defendants, hereby alleges the following:

**INTRODUCTION**

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

### **PARTIES**

#### **Plaintiff**

7. The Plaintiff resides at [REDACTED]

#### **Corporate Defendants**

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

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

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

**Natural Person Defendants**

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

World Mission New Jersey, the wife of Dong Lee, and a resident of New Jersey. Bong Lee is an owner, either formally or informally, of Big Shine and Lincoln Grill.

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

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

### **JURISDICTION AND VENUE**

#### **Subject Matter Jurisdiction**

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

#### **Venue**

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

#### **Personal jurisdiction / Corporate Defendants**

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

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

**Personal jurisdiction / Natural Person Defendants**

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

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

**FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

**I. BACKGROUND FACTS REGARDING THE WORLD MISSION ENTERPRISE**

**A. The World Mission Enterprise**

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

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



58. If Dong Lee attempted to operate World Mission New Jersey independently of World Mission South Korea, he would be removed from his post by World Mission South Korea.
59. World Mission South Korea regularly sends instructions to World Mission New Jersey.
60. World Mission New Jersey regularly sends its attendance and donation records to World Mission South Korea.
61. With limited exception, World Mission South Korea approves all official literature, policies and practices used and employed by World Mission New Jersey.
62. On information and belief, almost all of the money raised by World Mission New Jersey is forwarded to World Mission South Korea.
63. World Mission New Jersey is the alter ego of World Mission South Korea.
64. World Mission South Korea is the alter ego of World Mission New Jersey.
65. World Mission New Jersey is also the alter ego of several profit-making companies, including Big Shine, Albright, Lincoln Grill, and others to be identified during the course of this litigation (the "Profit-Making Companies").
66. Each of the Profit-Making Companies is the alter ego of World Mission New Jersey.
67. In fact, Big Shine and Albright share the same office space in Glen Rock, New Jersey.

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

68. World Mission South Korea claims to be a "church."
69. World Mission New Jersey claims to be a "church."
70. Defendants try to avoid being held accountable for their actions by portraying their secular crimes and torts as "religious" so that they can take advantage of laws that give special protections to religions.

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

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

80. Even if the conduct alleged herein constitutes religious expression, the Defendants may be held liable because their conduct tends to inflict serious, life-threatening harm on their victims.
81. Victims of the Defendants often become suicidal, depressed, anxious, psychotic, or alienated from their families as a result of the Defendants' conduct.
82. Therefore, the State of New Jersey has a compelling interest in stopping such conduct by allowing the Plaintiff to hold the Defendants liable.
83. Allowing the Plaintiff to hold the Defendants liable is the least restrictive means for the State of New Jersey to satisfy its compelling interest.

**C. Criminal Nature of the World Mission Enterprise**

84. Despite the pretense that World Mission South Korea and World Mission New Jersey are "churches" which exist for non-profit purposes, World Mission New Jersey is actually part of a criminal business enterprise which is run for a profit.
85. World Mission New Jersey purportedly subsists off of the donations of its members.
86. However, in addition to collecting donations from its members, World Mission New Jersey also dominates and controls the Profit-Making Companies.
87. On information and belief, World Mission New Jersey has used its nonprofit tax exemption number to purchase supplies and inventory for the Profit-Making Companies.
88. World Mission New Jersey staffs the Profit-Making Companies exclusively with its own members.

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

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

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

**D. Activities of World Mission New Jersey**

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

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

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

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



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

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

**F. The "Righteous Lie Doctrine"**

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

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

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

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

156. In April, 2008, the Plaintiff met and began dating [REDACTED] her future husband.

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

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

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

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

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

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

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

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

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

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

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

**B. The Increasing Time Commitment**

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

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

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

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

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

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

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

**C. Sleep Deprivation**

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



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

**D. Family Separation**

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

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

**E. The Plaintiff Was Conscripted to Recruit New Members**

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

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

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

**F. The Plaintiff Encounters the "Righteous Lie Doctrine"**

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

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

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

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

**G. The Plaintiff Uncovers the Truth**

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

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

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

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

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

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

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

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

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

**H. World Mission New Jersey Retaliates Against the Plaintiff**

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

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

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

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

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



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

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

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

308. By doing all of this, World Mission New Jersey kept both the Plaintiff and [REDACTED] deprived of sleep.

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

310. Finally, [REDACTED] moved out of the marital home permanently, and filed for divorce.

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

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

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

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

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

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

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

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

318. Dong Lee refused to produce any such evidence.

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

the forums provided World Mission with all of the information that World Mission requested.

330. In fact, internet companies do not generally provide that kind of information without a court order or subpoena.

331. Dong Lee lied to the Plaintiff about how he uncovered the Plaintiff's identity in order to prevent the Plaintiff from learning that World Mission New Jersey had illegally hacked into her Internet accounts.

332. At that meeting, Dong Lee told the Plaintiff that she was no longer welcome to return to World Mission. Thus, on April 22, 2011, the Plaintiff left World Mission New Jersey for good.

333. The Plaintiff left the meeting having refused to sign the NDA.

334. Subsequently, the Defendants began showing pictures of the Plaintiff to members of World Mission New Jersey, and instructing the members not to have any communication with the Plaintiff.

335. After the April 22, 2011 meeting, the Plaintiff did more research into the World Mission Enterprise, and began to uncover the facts pertaining to the fraud, as alleged herein.

**CLAIMS FOR RELIEF**

**CAUSE OF ACTION #1<sup>1</sup>**

**INTENTIONAL FRAUD**

**(Arising Out of False representations)**

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

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<sup>1</sup> To the extent that the causes of action in this Complaint are contradictory, they are pled in the alternative.

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

337. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis made false representations in order to intentionally mislead the Plaintiff into believing that World Mission New Jersey existed for non-profit, charitable, or tax-exempt purposes, and that donations made to World Mission New Jersey would be used exclusively for non-profit, charitable, or tax-exempt purposes. Those false representations included, but not were limited to, the following:

- 1) The corporate name of World Mission New Jersey contained the word "nonprofit" ("World Mission Society Church of God, a NJ Nonprofit Corporation"), falsely implying that World Mission New Jersey existed for non-profit, charitable, or tax-exempt purposes.
- 2) Donation receipts issued by World Mission New Jersey provided a tax identification number as well as additional language required by the IRS for tax-exempt donations, falsely implying that donations to World Mission New Jersey would be used exclusively for non-profit, charitable, or tax-exempt purposes.
- 3) The Defendants repeatedly and falsely claimed that significant amounts of money donated to World Mission New Jersey would be used to provide food to victims of natural disasters.

- 4) The Defendants repeatedly and falsely claimed that the leaders of World Mission New Jersey were unpaid volunteers who were not paid by World Mission New Jersey, even though many of them are either paid by World Mission New Jersey or by the Profit-Making Companies which are controlled by World Mission New Jersey.
- 5) The Defendants repeatedly and falsely claimed that the church does not engage in profit-making enterprises.

338. Beginning from the time that the Plaintiff was recruited into World Mission New Jersey in October 2009, and continuing until the Plaintiff's membership in World Mission New Jersey was terminated on April 22, 2011, the Defendants repeatedly and on an ongoing basis made false representations in order to intentionally mislead the Plaintiff into believing that World Mission New Jersey was a pro-family organization that welcomed families into its membership and that encouraged families to remain strong and intact. Those false representations included, but not were limited to, the following:

- 1) The Defendants repeatedly and falsely claimed that World Mission New Jersey encouraged family interaction.
- 2) The Defendants repeatedly and falsely claimed that World Mission New Jersey strove to bring families together.
- 3) The Defendants repeatedly sponsored "Family Unity" events in order to create the false impression that World Mission New Jersey promoted family unity.

339. The false representations alleged herein are material, in that if the false representations had not been made, the Plaintiff would not have joined World Mission New Jersey,

continued as a member of World Mission New Jersey, or donated money, time and energy to World Mission New Jersey.

340. At all times when material false representations were made, as alleged herein, the Defendants knew such representations were false or dishonest, deceptive and misleading.

341. The Defendants made material false representations, as alleged herein, with the intent to defraud and deceive the Plaintiff into donating money, time and energy to World Mission New Jersey that she would not have otherwise donated, and which Defendants knew she would not have otherwise donated.

342. The Defendants made material false representations, as alleged herein, with the intent that the Plaintiff would rely on such false representations when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.

343. The Plaintiff justifiably relied on the Defendants' false representations, as alleged herein, when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.

344. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.

345. As a direct and proximate result of the Plaintiff's reliance on the false representations alleged herein, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.



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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

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

**CAUSE OF ACTION #2**

**INTENTIONAL FRAUD**

**(Arising Out of Non-Disclosures)**

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

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

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

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

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

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

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

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #3**



## INTENTIONAL FRAUD

(Arising Out of Cult Watch Site)

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

373. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
374. In or around 2009, and continuing through April 2011, the Defendants with a significant contribution from Jun Lee, conspired to set up and maintain the Cult Watch Site, and to make false representations in order to intentionally mislead the Plaintiff into believing the Cult Watch Site was owned and operated by critics of World Mission. Those false representations included, but were not limited to, the following:
- 1) The Cult Watch Site was located at a URL which falsely implied that the owners of the website believed that World Mission was a cult: cultwatchahnsahng hong.com.
  - 2) The Cult Watch Site contained the following heading which falsely implied that the owners of the website believed that World Mission was a cult: "Cult Watch Ahnsahng hong Exposing the World Mission Society Church of God."
  - 3) The Cult Watch Site contained the following misleading paragraphs, as shown in Exhibit A, attached hereto:

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

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

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

#### **CAUSE OF ACTION #4**

#### **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

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

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

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

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #5**



## NEGLIGENT MISREPRESENTATION

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

404. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
405. The Defendants negligently failed to disclose material facts, as alleged in Cause of Action #2.
406. At all times when the Defendants failed to disclose material facts, they had no reasonable grounds for believing that they had no duty to disclose such facts.
407. The Plaintiff justifiably relied on the Defendants' non-disclosures, as alleged herein, when deciding to join World Mission New Jersey, remain a member of World Mission New Jersey, and donate money, time and energy to World Mission New Jersey.
408. As a direct and proximate result of the Plaintiff's reliance on these nondisclosures, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
409. As a direct and proximate result of the Plaintiff's reliance on these nondisclosures, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
410. As a direct and proximate result of the Plaintiff's reliance on these nondisclosures, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #6**

**BREACH OF FIDUCIARY DUTY**

**(Against Dong Lee)**

420. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
421. Dong Lee owed fiduciary duties to the Plaintiff, arising out of the following facts:
- 1) Dong Lee knowingly undertook to act for the benefit of the Plaintiff, by promising spiritual guidance and establishing a clergy-parishioner relationship with the Plaintiff;
  - 2) in order for Dong Lee to provide such guidance to the Plaintiff, it was necessary for the Plaintiff to place her trust in him;
  - 3) Dong Lee knew that material false representations were being made to the Plaintiff, as alleged in Cause of Action #1;

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #7**

**CONSTRUCTIVE FRAUD**

**(Against Dong Lee)**

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

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



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

448. Therefore, Dong Lee's breach of fiduciary duties constitutes a constructive fraud.
449. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
450. As a direct and proximate result of Dong Lee's breaches of fiduciary duties, the Plaintiff was damaged, in that she inadvertently gave her email address and password to World Mission New Jersey, which then used her email address and password to hack into her Internet accounts.
451. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
452. As a direct and proximate result of Dong Lee's constructive fraud, the Plaintiff was damaged, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #8**

**UNJUST ENRICHMENT**

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #9**

**INVASION OF PRICACY / INTRUSION UPON SECLUSION**

**(Arising Out of Computer Hacking)**

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

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

469. The Defendants intruded upon the seclusion of the Plaintiff by undertaking the following actions:

- 1) setting up the Cult Watch Site in order to lure the Plaintiff into turning over her email address and password to World Mission New Jersey;
- 2) using the Plaintiff's email address and password to hack into her other Internet accounts;
- 3) obtaining through unauthorized access of the Plaintiff's Internet accounts the details of statements that she had posted anonymously; and
- 4) disclosing the details of those anonymous statements to other people.

470. Each of those intrusions would be highly offensive to a reasonable person.

471. Therefore, the Defendants have invaded the Plaintiff's privacy.

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

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

**CAUSE OF ACTION #10**

**VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /**

**N.J.S.A. § 56:8-2**

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

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

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

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

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

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

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

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



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

490. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
491. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
492. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.
493. The Plaintiff is therefore entitled to relief pursuant to the New Jersey Consumer Fraud Act, N.J.S.A. § 56:8-19.

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #11**

**VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /**

**N.J.S.A. § 56:8-2**

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #12**

**VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /**

**N.J.S.A. § 56:8-2**

**(Unconscionable Commercial Practices In Connection with Sale of Merchandise)**

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #13**

**VIOLATION OF NEW JERSEY CONSUMER FRAUD ACT /**

N.J.S.A. § 56:8-2.7

**(Fraud In Connection with Solicitation of Funds or Contributions)**

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

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

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

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

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

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

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

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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



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

**CAUSE OF ACTION #14**

**BIAS CRIMES / N.J.S.A. § 2A:53A-21**

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

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

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

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

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

WHEREFORE, the Plaintiff demands judgment be entered for:

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

**CAUSE OF ACTION #15**

**CIVIL CONSPIRACY**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #16**

**CONCERT OF ACTION**

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

565. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
566. The Defendants pursued a common plan to commit the acts and omissions alleged herein.
567. The Defendants actively participated in, aided, and encouraged the wrongful acts and omissions alleged herein.
568. The Defendants each ratified the wrongful acts and omissions as alleged herein.
569. The wrongful acts and omissions, as alleged herein, were done for the benefit of each of the Defendants, in that the money, time and energy donated by the Plaintiff inured to the benefit of World Mission South Korea, World Mission New Jersey, Chang, and Kim, and the job performances of Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are all measured by such donations.
570. Therefore, all of the Defendants should be liable for the torts committed by the other Defendants.
571. As a direct and proximate result of the Defendants' concerted action, the Plaintiff was damaged, in that she donated money and time to World Mission New Jersey that she otherwise would not have donated.
572. As a direct and proximate result of the Defendants' concerted action, the Plaintiff was damaged, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

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

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

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

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

**CAUSE OF ACTION #17**

**JOINT AND SEVERAL LIABILITY**

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

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

581. The acts and omissions of each Defendant contributed as a substantial factor proximately causing the Plaintiff's damages, as alleged herein.

582. Therefore, to the extent that the total injury or loss cannot be subdivided, each Defendant should be held jointly and severally liable for the torts committed by the other Defendants.

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



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

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

#### **CAUSE OF ACTION #18**

#### **VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

583. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
584. Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee are each agents or employees of World Mission South Korea.
585. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting within the scope of their agency or employment with World Mission South Korea.
586. At all times relevant herein, Defendants Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee were each acting substantially within the authorized time and space limitations imposed on them by World Mission South Korea.

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

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

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

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

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

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

**CAUSE OF ACTION #19**

**VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

**CAUSE OF ACTION #20**

**VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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



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

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

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

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

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

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

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

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

**CAUSE OF ACTION #21**

**VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

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

**CAUSE OF ACTION #22**

**VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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



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

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

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

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

**CAUSE OF ACTION #23**

**VICARIOUS LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #24**

**DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

**CAUSE OF ACTION #25**

**DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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



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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #26**

**DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

**CAUSE OF ACTION #27**

**DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

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

**CAUSE OF ACTION #28**

**DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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

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

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

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

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

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

#### **CAUSE OF ACTION #29**

#### **DIRECT LIABILITY FOR ACTS OF EMPLOYEES OR AGENTS**

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

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

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



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

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

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

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

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

**CAUSE OF ACTION #30**

**JOINT ENTERPRISE LIABILITY**

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

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

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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #31**

**PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #32**

**PIERCING THE CORPORATE VEIL**

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

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

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



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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #33**

## **PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #34**

**PIERCING THE CORPORATE VEIL**

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

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

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



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

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

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

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

**CAUSE OF ACTION #35**

**PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

**CAUSE OF ACTION #36**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #37**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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



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

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

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

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

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

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

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

**CAUSE OF ACTION #38**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #39**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

972. World Mission South Korea and World Mission New Jersey are each alter egos of each other.
973. World Mission South Korea exercises pervasive control over World Mission New Jersey.
974. World Mission South Korea and World Mission New Jersey each substantially disregard each other's separate corporate nature.
975. On information and belief, the funds of World Mission South Korea and the funds of World Mission New Jersey are frequently comingled.
976. World Mission South Korea and World Mission New Jersey have created serious ambiguity as to the manner and capacity in which they and their representatives were acting when committing the actions and omissions alleged herein.
977. World Mission South Korea and World Mission New Jersey have a common ownership and common management, in that both are owned and managed by Chang and Kim.
978. World Mission South Korea and World Mission New Jersey both operate under the same name: World Mission Society Church of God.
979. On information and belief, World Mission South Korea and World Mission New Jersey have made impermissible transfers of money to each other.
980. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that World Mission South Korea and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
981. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that World Mission South Korea and World Mission New Jersey



worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.

982. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
983. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
984. As a direct and proximate result of the close relationship between World Mission South Korea and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
985. World Mission South Korea and World Mission New Jersey are using each other to defeat the ends of justice, by shielding each other from liability for the acts and omissions alleged herein.
986. World Mission South Korea and World Mission New Jersey are using each other to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.

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

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

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

**CAUSE OF ACTION #40**

**PIERCING THE CORPORATE VEIL**

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

995. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.
996. Chang is closely identified with the affairs of World Mission South Korea.
997. Chang and World Mission South Korea are each alter egos of each other.
998. Chang exercises pervasive control over World Mission South Korea.
999. Chang substantially disregards the separate nature of the World Mission South Korea corporate entity.

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

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

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

1015. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

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

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

**CAUSE OF ACTION #41**

**PIERCING THE CORPORATE VEIL**

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

1016. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

1017. Kim is closely identified with the affairs of World Mission South Korea.

1018. Kim and World Mission South Korea are each alter egos of each other.

1019. Kim exercises pervasive control over World Mission South Korea.

1020. Kim substantially disregards the separate nature of the World Mission South Korea corporate entity.
1021. Kim has created serious ambiguity as to the manner and capacity in which World Mission South Korea and its representatives were acting when committing the actions and omissions alleged herein.
1022. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission South Korea worked together to make the false representations alleged in Causes of Action #1 and #3.
1023. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Kim and World Mission South Korea worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1024. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1025. As a direct and proximate result of the close relationship between Kim and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

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



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

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

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

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

**CAUSE OF ACTION #42**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

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

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

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

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

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

**CAUSE OF ACTION #43**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

1076. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1077. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1078. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1079. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1080. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.
1081. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

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

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

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

**CAUSE OF ACTION #44**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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



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

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

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

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

**CAUSE OF ACTION #45**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

**CAUSE OF ACTION #46**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

1129. Bong Lee has created serious ambiguity as to the manner and capacity in which World Mission New Jersey and its representatives were acting when committing the actions and omissions alleged herein.
1130. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Bong Lee and World Mission New Jersey worked together to make the false representations alleged in Causes of Action #1 and #3.
1131. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered from fraudulent consequences, in that Bong Lee and World Mission New Jersey worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1132. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1133. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1134. As a direct and proximate result of the close relationship between Bong Lee and World Mission New Jersey, the Plaintiff has suffered injurious consequences, in that she has

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

1135. Bong Lee is using World Mission New Jersey to defeat the ends of justice, by shielding herself from liability for the acts and omissions alleged herein.
1136. Bong Lee is using World Mission New Jersey to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1137. Bong Lee is using World Mission New Jersey to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1138. Bong Lee is using World Mission New Jersey to evade the law.
1139. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1140. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1141. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1142. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.
1143. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.



1144. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

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

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

**CAUSE OF ACTION #47**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

1145. The Plaintiff repeats and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if the same were set forth herein verbatim and at length.

1146. Chang is closely identified with the affairs of World Mission South Korea.

1147. Chang and World Mission South Korea are each alter egos of each other.

1148. Chang exercises pervasive control over World Mission South Korea.

1149. Chang substantially disregards the separate nature of the World Mission South Korea corporate entity.
1150. Chang has created serious ambiguity as to the manner and capacity in which World Mission South Korea and its representatives were acting when committing the actions and omissions alleged herein.
1151. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission South Korea worked together to make the false representations alleged in Causes of Action #1 and #3.
1152. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered from fraudulent consequences, in that Chang and World Mission South Korea worked together to conceal material information regarding the World Mission Enterprise, as alleged in Cause of Action #2.
1153. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she donated money, time and energy to World Mission New Jersey that she would not have otherwise donated.
1154. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

1155. As a direct and proximate result of the close relationship between Chang and World Mission South Korea, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1156. Chang is using World Mission South Korea to defeat the ends of justice, by shielding herself from liability for the acts and omissions alleged herein.
1157. Chang is using World Mission South Korea to perpetrate a fraud, as alleged in Causes of Action #1, #2, and #3.
1158. Chang is using World Mission South Korea to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1159. Chang is using World Mission South Korea to evade the law.
1160. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.
1161. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1162. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.
1163. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

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

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

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

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

**CAUSE OF ACTION #48**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

embarrassment, apprehension, and terror, requiring at least six months of professional counseling.

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

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

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

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

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

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

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

**CAUSE OF ACTION #49**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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



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

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

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

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

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

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

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

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

**CAUSE OF ACTION #50**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

1215. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered injurious consequences, in that she experienced severe emotional pain and mental anguish, including depression, nervousness, grief, anxiety, worry, shock, humiliation, indignity, fright, mortification, embarrassment, apprehension, and terror, requiring at least six months of professional counseling.
1216. As a direct and proximate result of the close relationship between Dong Lee, Tara Whalen, Richard Whalen, and Albright, the Plaintiff has suffered injurious consequences, in that she has incurred, and will incur, medical and incidental expenses for the care and treatment of these injuries.
1217. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to defeat the ends of justice, by shielding themselves from liability for the acts and omissions alleged herein.
1218. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to perpetrate a fraud, as alleged in Cause of Action #2.
1219. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to accomplish the crimes alleged herein, including fraud, hacking, tax evasion, labor violations, and other related crimes.
1220. Dong Lee, Tara Whalen, and Richard Whalen are using Albright to evade the law.
1221. The Plaintiff's damages resulted from actions by Chang, Kim, Dong Lee, Bong Lee, Tara Whalen, Richard Whalen, Lozada, and Jun Lee which evidence a reckless disregard for the duties imposed by their respective positions.

1222. World Mission South Korea is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1223. World Mission New Jersey is not a nonprofit corporation, society or association organized exclusively for religious, charitable or educational purposes; and even if it is, it was not engaged in the performance of the charitable objectives it was organized to advance at any time relevant to the allegations herein.

1224. The acts and omissions of the Defendants, as alleged herein, were willful or wanton.

1225. The acts and omissions of the Defendants, as alleged herein, were actuated by actual malice.

1226. The acts and omissions of the Defendants, as alleged herein, were accompanied by a wanton and willful disregard of persons who foreseeably might be harmed by those acts or omissions.

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

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

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

**CAUSE OF ACTION #51**

**REVERSE-PIERCING THE CORPORATE VEIL**

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

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

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

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

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

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

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

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

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

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

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



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

**TRIAL COUNSEL DESIGNATION**

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

**JURY DEMAND**

Plaintiff demands trial by jury on all issues so triable.

**CERTIFICATION**

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

Dated: April 19, 2013

By:   
**PAUL S. GROSSWALD**

Attorney for Plaintiff,  
**Michele Colón**

# **EXHIBIT**

**A**

INTERNET ARCHIVE  
Wayback Machine  
http://www.cultwatchahnsahnghong.com/main/  
OCT 8 2010

# Cult Watch Ahnsahnghong Exposing the World Mission Society Church of God

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## Home

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

If you or a family member are considering joining this group, who worship the false idols Ahnsahnghong (sometimes spelled Ahn Sang-hong or Ahn Sahng hong) and Mother Jerusalem, please read this website carefully. Testimonies of ex WMS-COG members wil continue to be added.

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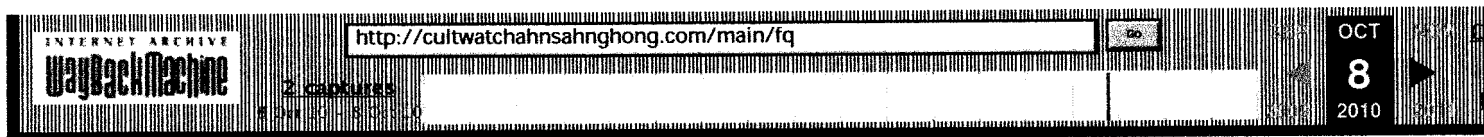
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# **EXHIBIT**

**B**



# Cult Watch Ahnsahng Hong Exposing the World Mission Society Church of God

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## F&Q

1. IS AHNSAHNGHONG THE SECOND COMING OF CHRIST?

No.

2. DID AHNSAHNGHONG EVER CLAIM TO BE CHRIST?

No.

3. DID AHNSAHNGHONG MENTION THE SECOND COMING IN ANY OF HIS BOOKS?

Yes. He believed Christ would come in 1967 and then 1988.

4. DID AHNSAHNGHONG PERFORM MIRACLES?

No.

5. DID AHNSAHNGHONG ASCEND INTO HEAVEN?

No, he is buried in Korea.

6. WAS AHNSAHNGHONG BEATEN AND CRUCIFIED?

No, he died peacefully of a cerebral blood clot.

7. WAS HE A HOLY MAN?

He was a Biblical scholar. He wrote books on Christ and the Bible.

8. WAS HE SINLESS AND PURE?

No. He had multiple wives, lovers and children. His last lover was a woman named Chung Gil Cha (Xhang Gil Cha). None of his sons or daughters believe him to be the Second Coming of Christ.

9. WHY CAN'T I FIND ANY INFORMATION ON THE WMS CHURCH OF GOD?

You can find information on the WMS CHURCH OF GOD. Unfortunately it's only information they want you to know. Any information that reveals the truth about their church is subverted. What's more, since the "COG blog order" hundreds of COG member have set up free blog pages to flood the net with propoganda.

**10. WHY IS THIS INFORMATION SUBVERTED?**

Because it reveals the Church of God to be a carefully constructed lie.

**11. WHY DOES THE CHURCH OF GOD SAY THE INTERNET IS BAD?**

Because the internet allows Church of God members to interact with people outside it's carefully constructed hive mind.

**12. WHAT IS A HIVE MIND?**

In this case it means a group of people brainwashed into believing a falsehood.

**13. WHY DOES THE CHURCH OF GOD WANT ITS MEMBERS NOT TO ASSOCIATE OR ENGAGE IN DISCUSSION WITH "OUTSIDERS"?**

Because this may cause their followers to question the false teachings which have gradually been implanted in their minds.

**14. WHY ARE WMS CHURCH OF GOD MEMBERS SO FRIENDLY?**

Two reasons. Fristly they genuinely believe that they have the "truth" and secondly, because the pastors urge their congregations to engage in love bombing with new recruits.

**15. WHAT IS LOVE BOMBING?**

Love bombing is the deliberate showing of affection or friendship, by an individual or group of people, toward another person. This action may be motivated in part by the desire to recruit or influence. Though not always feigned, this practise is usually always manipulative. Love bombing is often cited as one of the defining characteristics of a cult.

**16. HOW ARE YOU SURE THIS LOVE ISN'T SINCERE?**

To an indoctrinated Church of God member, the love is sincere. But the Church of God's motivations behind the love, is not. For example, when I was a COG deacon our Pastor would frequently take me aside and instruct me to be friendly and flattering to a new recruit. He instructed me in detail on how to do this. The rule was to constantly compliment the new recruit and frequently praise him- tell him he's smart, show interest in him, act as though I want to know him, show him that I care etc. When I did these things I did them relatively sincerely, but the motivation behind these acts of love were singleminded- to get the person recruited. And of course once the person is recruited, I removed this love and focus it on another potential recruit.

**17. BUT YOU SAID YOUR PASTOR TOOK YOU ASIDE. WHY IS EVERYONE ELSE FRIENDLY?**

Firstly, each and every member is urged by the pastor. Secondly, people often view a behaviour as being more correct in a given situation to the degree in which we see others performing it. This principle is called Social Proof. We see other individuals as role models and we observe and imitate their behaviour. Thus, in the tight social group which the Church of God strives to build, everyone imitates everyone else.

**18. SO IS LOVE BOMBING A CO-ORDINATED EFFORT?**

Yes. Love bombing is a coordinated effort, usually under the direction of leadership that involves long-term members' flooding recruits and newer members with flattery, verbal seduction, affectionate but usually nonsexual touching, and lots of attention to their every remark. Love bombing, or the offer of instant companionship, is a deceptive ploy accounting for many successful recruitment drives.

**19. WHERE DOES THE CHURCH OF GOD RECRUIT NEW MEMBERS?**

University campuses, fitness clubs, gyms, malls, libraries, door to door propogation, military bases, third world villages etc.

**20. WHY THESE SPECIFIC PLACES?**

University campuses are populated by inexperienced young adults, some of whom are away from home and hunger for the surrogate family offered by the Church of God. Fitness clubs, gyms and libraries are good places to pick up individuals who

are not in groups. Libraries in particular, tend to be good places to pick up loners who need to feel loved or are in search for meaning. Third world villages are typically uneducated, unaware of the Bible and so readily believe what they hear. American and British military bases in Korea are targeted because the troopers are away from home, family and loved ones and likewise often feel lonely.

**21. SO THE CHURCH OF GOD PLAYS ON EMOTIONS WHEN LOOKING FOR RECRUITS?**

**Exactly.**

**22. WHY ARE WMS CHURCH OF GOD MEMBERS ALWAYS CALLING ME?**

**They like to keep a tight leash on their members.**

**23. SO WHAT IF IT'S A CULT? IT FEELS GREAT!**

**So does cocaine.**

**24. BUT HOW IS THE CHURCH OF GOD HARMFUL?**

**It robs you of your life. It wastes years. It encourages you to quit your education. It encourages you to be a recruit, regardless of your God given spiritual gifts and talents. It kills individuality and creativity. It forces you to worship a false idol. It robs you of money. It causes rifts in families and gradually turns you into a mindless drone. It makes you a slave to ideology and cripples your critical thinking.**

**25. SOUNDS A BIT LIKE ALCOHOL.**

**Alcohol is cheaper.**

**26. WHY ARE CHURCH OF GOD MEMBERS MAINLY WOMEN?**

**Women are psychologically easier to persuade.**

**27. WHY ARE CHURCH OF GOD MEMBERS MAINLY YOUNG ADULTS?**

**Young adults lack critical thinking, experience and are usually far easier to persuade.**

**28. HOW DOES THE WMS CHURCH OF GOD ESTABLISH CHURCHES?**

**By lying and deceiving.**

**29. CAN YOU BE MORE SPECIFIC?**

**They have a three step process for establishing a church. Pastors with two or more years COG experience will fly over and locate areas best suited for a church. Usually university towns or areas with a healthy pool of Korean immigrants. They then buy a residential home and convert it for church use. Kitchen, eating room, study room, worship room, baptismal room etc. The house is divided simply. They even remove a lot of the doors to make things less private and more "open plan".**

**They then fly over Korean teenagers with student Visas and enlist them in English language courses. They even give them English names! While learning english these Korean missionary "kids" (19-29 years) build the local church. They form the base congregation while simultaneously recruiting locals. These "kids" usually have part time unskilled jobs working in such places as MacDonalds, fast food joints etc. They're uneducated yet exceedingly well versed (seemingly) in the Bible.**

**30. THESE "KIDS" YOU SPEAK ABOUT, WHO ARE THEY?**

**Young adults plucked from their families and sent abroad to Western countries like the UK and US. As they speak no english they're forced to rely solely on the other Korean members in the church for teaching and friendship. This forms strong bonds. They literally have nothing outside the church.**

**31. A FORCED DEPENDENCY?**

**Exactly.**

**32. WHY DOES THE CHURCH OF GOD SHOW ME PHOTOGRAPHS?**



To trick you into thinking that you are part of a large, worldwide family. They show you a picture of a huge congregation and you immediately think "So many people can't be wrong!" They also show new recruits various awards and certificates. Most are false, insignificant or represent unrecognised religious institutes.

### 33. WHAT IS THE PURPOSE OF THE CHURCH OF GOD?

It only has two real purposes: recruiting new members and fund-raising.

### 34. WHAT ABOUT SALVATION AND AHNSAHNGHONG?

That's just the hook used to keep you obedient. Once you've memorised all the repeated doctrines they send you out to bring in more recruits. Of course altruistic movements, established religions and other honorable groups also recruit and raise funds, but these actions are all incidental to an honorable group's main purpose of improving the lives of its members and of humankind in general. A Destructive cult like the COG may claim to make social and personal contributions, but in actuality such claims are superficial and only serve as gestures or fronts for recruiting and fund raising. A cult's real goal is to increase the prestige and wealth of the leader.

### 35. YOU SAID ELSEWHERE ON THE WEBSITE THAT CULTS TEND TO HAVE ETHICAL DOUBLE STANDARDS. WHAT DOES THIS MEAN?

Members are urged to be obedient to the cult, to carefully follow cult rules. They are also encouraged to be revealing and open in the group, confessing all to the leaders and pastors. On the other hand, outside the group they are encouraged to act unethically, manipulating outsiders or nonmembers and either deceiving them or simply revealing very little about themselves or the group. In contrast to destructive cults, honorable groups teach members to abide by one set of ethics and act ethically and truthfully to all people in all situations.

### 36. SO THE CHURCH OF GOD LIES TO OUTSIDERS AND NEW RECRUITS WHILE ENCOURAGING MEMBERS TO BE INTIMATE AND OPEN WITH THE PASTOR?

Exactly.

### 37. BUT WHY?

Because they want absolute control of the flow of information. All cults operate in secrecy this way.

### 38. WHAT ABOUT THE DOCTRINES AND BIBLICAL INTERPRETATIONS OF THE CHURCH OF GOD, ARE THEY TRUE?

No.

### 39. BUT THEY CLAIM TO BE THE "TRUTH".

It's easy to see the when you don't look too far.

### 40. BUT IT MAKES SO MUCH SENSE!

It only makes sense in the context in which it is explained. But it's all completely false. Educate yourself and apply some critical thinking.

### 41. WHY DOES THE CHURCH OF GOD PREACH THE MESSAGE OF THE PASSOVER AND VARIOUS OTHER PHYSICAL FEASTS?

To distract you. To keep you focussed on the physical.

### 42. ARE CHURCH OF GOD PASTORS OR MISSIONARIES WELL EDUCATED?

Nope. Few have proper Bibilcal training. None have a knowledge of Hebrew. Virtually all only know the Bible by memorising the Church of God's 20 or so recruitment messages. Recently the COG have started their own strictly regulated training semenars. Pastors are required to sit several papers and exams before being promoted.

### 43. WHY DOES THE CHURCH OF GOD FEED ME?

Most cults use low protein diets to make members more malleable. It lowers the heart rate, mentally makes you less

**responsive and impairs your critical thinking.**

**44. WHY DO THEY WANT ME MENTALLY SLOW AND LESS RESPONSIVE?**

**So that when they unload huge chunks of Biblical data on you, your mind won't be able to properly process it. Therefore you blindly accept what they say.**

**45. WHY DOES EVERYONE IN THE CHURCH OF GOD HAVE THE SAME VERSES UNDERLINED IN THEIR BIBLES?**

**Because they've all been trained to memorise the same verses. These are the only verses necessary to affirm their faith.**

**46. BUT CAN THE BIBLE BE USED TO CORRECTLY PROVE THEIR FAITH?**

**No. Only if you shut your mind down and let it.**

**47. WHY DOES THE CHURCH OF GOD WANT ME TO PLAY CHESS, FOOTBALL AND KNIT WITH THEIR MEMBERS?**

**This is how they gradually impose order and obedience. Repeated group activity and social conditioning is one of the more subtle methods used by most cults.**

**48. DO CHURCH OF GOD PASTORS RECEIVE BIBLICAL TRAINING?**

**No.**

**48. DOES MY CHURCH OF GOD PASTOR BELIEVE IN AHNSAHNGHONG?**

**I can only speak from experience. None of the Church of God pastors that I have met (who stem back from the early 90's) believe in Ahnsahnghong as a Messiah. However the entire new crop of COG pastors are definately faithful. They are passionate in Ahnsahnghong, as they have been brought up in the church from a very young age.**

**49. WHY DOES THE CHURCH OF GOD WANT ME TO PLAY (FOOTBALL) WITH THEIR MEMBERS ON A SUNDAY AND THEN HAVE LUNCH AT THEIR CHURCH?**

**Again, they want you constantly under their thumb. Gradually this builds a hive mind in which the group begins to identify itself as a single unit.**

**50. WHY ARE ALL CHURCH OF GOD SERMONS REPETITIVE? WHY DO THEY NEVER DEAL WITH OTHER ASPECTS OF THE BIBLE?**

**Two reasons. One, the pastors and daacons don't understand any part of the Bible that doesn't apply to Ahnsahnghong and two, their faith collapses under the weight of Biblical scrutiny.**

**51. WHY DOES THE WMS COG PREACH ABOUT THE "END" BEING A NUCLEAR FIRE?**

**From David Koresh to Jonestown, self appointed messiahs often predict their own destruction. Some predict that they will die in a hail of bullets, some predict that they will be crucified, while others vaguely predict that they will be killed by "the system".**

**In Mother Jerusalem's case, she believes she will die in a nuclear fire. But does Mother believe she is God? Of course not. People like her have compartmentalised their brains and learnt to live in a self-made delusion.**

**Their self destructive behaviour arises from the fact that they cannot live as Gods while here on earth, and so hope to die as Gods instead. Psychologists refer to this as "destructive manifest destiny", which simply means that an individual acts out their life to fulfill something they want, or have predicted.**

**52. BUT THE COG'S ANTI-CHRIST TEACHINGS SEEM SO VALID.**

**Then why aren't you a Protestant? They literally founded and invented ALL the COG's "Catholic Church is the anti-christ" teachings.**

**And they did this over 5 centuries ago. Their Reformation came about because they believed Rome had abused all it's political powers and so now failed to provide salvation. They basically were sick of Rome's regulations, power and esteem and so rebelled against the Pope, labling the entire Catholic Papalcy "evil", "anti christ" and "the whore of babylon" and moving on to**

start a religion on their own. They did this all, over five hundred years ago, and the COG simply parrots many of their teachings. Why make any actual doctrines when you can steal them from other religions?

53. HEY, YOU DIDN'T ANSWER MY QUESTION FOOL!

Gee, I was trying to inspire you to think for yourself. My point is, the COG and the Protestant's pick and mix prophecies are so vague you can apply them to any religious establishment. The "whore of Babylon" can equally be applied to Mother Jerusalem, as I've shown in the "examination of claims" section.

But in any case, all positions are untenable, both factually and from the only words of Scripture which tell us of the actual doctrines of the antichrist, those of the apostle John in his letters.

54. IS AHNSAHNGHONG THE "NEW NAME"?

No. The irony is that Ahnsahnghong himself, believes the new name to be "Jesus". In several of his books he speaks about the Second Coming of Christ. See "Examination of claims" for more info.

55. BUT THEN WHAT IS THE "NEW NAME"?

The issue of a NEW NAME is really a misinterpretation of the Bible. There is no literal new name. See Examination of Claims for a detailed study.

56. I THINK YOU ARE EVIL AND THAT YOUR WEBSITE IS THE WORK OF THE ANTI CHRIST!

Let me get this straight. You think I am the anti-christ and you also think the anti-christ is the Pope? Therefore to prove that I am not evil, I simply have to prove that I am not the Pope? Gee, you want to re-think your logic there buddy?

57. THE COG WANT ME TO QUIT MY COLLEGE DEGREE, WHAT SHOULD I DO?

That's a personal decision. Don't let anyone make it for you. Perhaps talk to your parents for advice.

58. WHY DOES TEACHING AND RECRUITING INVOLVE THREE PEOPLE?

It's not always 3 people. But most of the time it is. What you typically have are the "recruiter", the "teacher" and the "other new recruit".

Usually women or young girls do the recruitment work. They introduce the recruit to the church, make them feel comfortable and secure, and then introduce them to the male deacon or "teacher". The recruit is then put in a small room with the "teacher" the "recruiter" and another "new member".

It's thus a very comfortable environment. You have someone there you already know, someone there who wants to teach you and someone who's already been in your situation.

59. HOW CAN I LEAVE THE COG?

Just walk out the door. You don't owe anyone an explanation. But if you feel confident enough to argue your points with them, then go ahead and do so. Just make sure you learn your stuff well, as they will dance you around the Bible and try to embarrass you.

60. WHAT IS YOUR EVIL SECRET? YOU MUST HAVE SOME HIDDEN SIN! WHY DO YOU HONESTLY HATE THE COG?

You sound like these guys: [http://www.youtube.com/watch?v=pPol\\_m8wm8Y](http://www.youtube.com/watch?v=pPol_m8wm8Y)

You seek to rationalise the existence of my website by proclaiming that I am somehow immoral and unholy. The fact is, like a whistleblower, I am privy to information and am simply making that information known. It's why authors write books, why scientists publish papers and why great thinkers pursue truth.

61. HOW CAN I LEAVE WHEN I'VE ESTABLISHED SO MANY FRIENDSHIPS?

When I left the COG, several of my friends left with me. In fact, the particular branch I attended eventually had to close down because attendance had dropped so drastically. So I guess I was lucky in that respect.

But the thing about COG "friendship" is that it's not real friendship. It's simply used as a tool. It's conditional friendship, which

will be removed once you make clear your true feelings. At worse, you're treated as an enemy, at best, you're treated with extreme pity. If you need a certain kind of behaviour for your concern to others, it's not friendship but a transaction. This is why true friends and family display true, unconditional love.

**62. ONE OF THE KOREAN BOYS IN MY COG CHURCH (ENGLAND) DOESNT BELIEVE IN AHNSAHNGHONG BUT HE CAN'T LEAVE THE CHURCH BECAUSE HE NOW HAS NOWHERE TO GO. HE'S SCARED HIS PARENTS WONT ACCEPT HIM BACK. WHAT SHOULD HE DO?**

I know. It's sad. There are a lot of young people like this. They have no education, have been taken abroad and removed from their families. They've been groomed for 5 or 6 years specifically to be a COG drone. Most are encouraged to take low paying jobs and have no money or outside friends.

My suggestion is to just break free and do what your heart tells you to do. Maybe gather enough money (stop giving to the church) and buy a plane ticket back to Korea. Find your parents and tell them you made a mistake. They will understand.

**63. ARE THE COG'S BOOK OF DANIEL PROPHECIES CORRECT?**

The problem with the book of Daniel is that the prophecies are so vague, you can use them to "mean" anything. All Christian denominations have their own interpretations. Do some research, look at the vast range of different viewpoints that exist today.

**64. BUT DO THEIR INTERPRETATIONS HOLD ANY WATER?**

No, I've already pointed several flaws with their interpretation on this website.

**65. THE COG SAYS THAT THE "RAVENOUS BIRD" MENTIONED IN ISAIAH REFERS TO AHNSAHNGHONG.**

Yeah, the COG likes to pull little tricks like this. They say that Isaiah foretells the coming of Ahnsahnghong (the ravenous bird), but in truth, it does no such thing. It refers to King Cyrus. Since I've started making people aware of this, the COG have started saying that King Cyrus also refers to Ahnsahnghong. They're so confused, they just make up things as they go along.

**66. WHY IS THE COG GROWING SO FAST? EVER SINCE THE NEW JERUSALEM PREACHING FESTIVAL, THEY HAVE HAD ABOUT 55,000 BAPTISMS.**

Why do numbers matter? As Einstein once said: two things are INFINITE, the universe and human stupidity. The fact is, over half of those baptized people wise-up and walk away after a few months of being exposed to the doctrines. Those who don't, walk away after a period of probably 3-5 years.

**67. I AM A COG MEMBER. THE PICTURE YOU PORTRAY ON YOUR WEBSITE IS NOT IN TOUCH WITH REALITY.**

What is reality? You have to see and investigate all sides before you can claim to know the reality. Your point of view is too limited to ever fully understand the reality. You're just a pawn in their game. You see what they want you to see.

**68. HOW DO YOU CLAIM TO KNOW THE REALITY?**

The COG is a box. I have seen all faces of the box. I've also been studying theology and religion for over ten years. I and the other authors of this website are also ex members of the COG.

**69. WHY WON'T MY COG CHURCH LET MY FAMILY IN?**

The COG is very secretive and tends to shut their doors on anyone who hasn't been through their grooming process. If your family distrusts the COG, they will (usually) be prevented from entering the church.

**70. THIS IS A GREAT WEBSITE. HOW LONG HAS IT BEEN RUNNING?**

It's been up since, perhaps, November 2006.

**71. WE ARE LIVING IN THE TIME OF THE FEAST OF TABERNACLES! HEAVENTLY MOTHER WILL ENTER HEAVEN ALIVE WITH HER 144,000 SAINTS. THE END IS NEAR! THE PLAGUES WILL COME!**

Nope. Mother will physically die and pass away before any plagues come. There will be no end, no nuclear fire and no vast plagues. Mother is a very old woman now and will definitely die within our life time. When she does die, there will be no cataclysmic events.

When she passes away, no doubt Rev Joo Kim will seek to link her death with some event that took place that year. For example, if Mother had died on September 11th 2001, he would have said "the attack on the World Trade Centres was a sign from God". But it's obviously not true. It's just another lie to keep the religion going on.

All this apocalyptic talk relating to Mother's death will soon be changed. There are COG pastors reading this website right now and saying "oh no, let's change our doctrines".

**72. BUT WHY WOULD A CHURCH TEACH A THING IF IT SIMPLY IS NOT TRUE?**

Why does any church teach anything? You must be familiar with the feeling of not believing in another church's teachings. Why would Hinduism teach what it teaches if it's not true? Why would Islam teach what it teaches if it's not true? Why don't you believe in the Greek Gods of Zeus and Thor or Loki? Truth is a rare thing. The COG is not concerned about truth. It's concerned about manipulating the human need for truth, for it's own personal profit.

**73. LATE LAST NIGHT WE WERE PREACHING AT A UNIVERSITY AND A WOMAN WAS SO MOVED ABOUT THE TESTIMONY OF OUR SPIRITUAL MOTHER IN THE BIBLE THAT SHE CAME TO CHURCH AND STUDIED PAST MIDNIGHT. AND NO, SHE ISN'T DEPRESSED OR IN A LOW POINT IN HER LIFE. SHE IS MARRIED AND IS GOING TO COLLEGE. SHE HASN'T FOUND A CHURCH SHE FEELS COMFORTABLE AT, AT ALL.**

Let's look at the information carefully. She's in university so she's young. She's pursuing religion without her husband's knowledge, so she's spiritually unfulfilled and ashamed or insecure in some way. It's past midnight, so she's sleepy and slow witted. She hasn't found a church yet, so she's responding to the love bombing of the cult. Why don't you bring her husband in and talk to him as well, instead of brainwashing his wife behind his back?

**74. I HAD A GENUINE SPIRITUAL MOMENT WITH THE COG. HOW DO YOU EXPLAIN THIS?**

I know. It feels so real. These "spiritual moments" felt genuine for me too when I was a member. The thing is, it is very easy to manufacture a "spiritual experience". Islam, Hinduism, Judaism, Rastafarianism, all the world religions. . .they ALL have millions of people who claim to have been "spiritually moved". Do you not agree that these people all feel the same "spiritual feeling" when hearing a great hymn, testimony, or particular teaching?

**75. I GUESS SO. BUT SO WHAT?**

Now if all these religions have the same manufactured "spiritual feeling", then something wrong is going on. You and I both know how it feels. You're sitting there, in a strange place. You're surrounded by all these people. But it's not a spiritual moment, it's an emotional one. What you're feeling is the intensity of other people and your own mental projections. Soren Kierkegaard, the Danish, Christian philosopher summed it up perfectly. He said "true spiritual moments can only be felt when the body and soul are quiet and alone." Or as W James explains in the "Variety of Religious experiences"- groups induce their own feelings. Cults exploit this. It's why Jesus goes off into the wilderness to pray and find God and why monks dedicate their lives to solitude.

So if that young university woman felt a true "spiritual moment" then why do young women in other religions likewise feel similar "spiritual moments"? If one of these moments is real, then logically all other "moments" in other religions are false. Or more logically, all are false and a "spiritual moment" is not what you think it feels like. A true "spiritual moment" is in fact, something completely different.

**76. WOW, THAT'S REALLY HEAVY. I STILL DON'T UNDERSTAND.**

Very few people do. Which is why "crowds" seek to latch on to the few spiritual teachers who do understand spirituality.

**77. THEN WHAT IS TRUE SPIRITUALITY?**

Hey man, this website is about exposing the COG as a cult. I can't answer that.

**78. WHY DO I NEED TO MAKE AN APPOINTMENT PRIOR TO BEING ALLOWED INTO THE CHURCH? MY HUSBAND TURNED UP AT THE COG BUILDING BUT WASN'T ALLOWED INSIDE.**

The COG is very secretive and doesn't allow free thinkers into it's building. Only those who have been specifically selected and can easily be brainwashed are permitted entrance.

**79. HOW MUCH MONEY SHOULD I GIVE THE COG?**

**None. Actually, that's unfair. Be a good customer. Pay only for what you have eaten.**

**80. I'M WORRIED ABOUT MY DAUGHTER. SHE'S IN THE COG AND HAS CHANGED AND BECOME MILITANT AND AGGRESSIVE.**

Email me at [tieman64@hotmail.com](mailto:tieman64@hotmail.com).

**81. THIS WEBSITE HAS REALLY ALARMED ME. IS THE COG DANGEROUS?**

There is very little physical danger. The COG is classified as a low level destructive cult. In the past ten years, I've only heard of one case of a young girl committing suicide because of the pressure the COG put on her. Aside from that freak case, the COG's danger is primarily psychological. It affects relationships, family, personal finances and the minds of the individual. For an "end days" apocalyptic cult, it's doctrines are quite mild.

**82. MY COG PASTOR NEVER PREACHES WHEN NEW RECRUITS ARE PRESENT.**

Yes. The "sermons" for recruits and the "sermons" for already brainwashed members are quite different. If a new recruit heard the pastor's sermon he'd likely run away. Hence when new recruits are invited, deacons are asked to give a simple sermon which doesn't mention ahnsahnghong or any other silly COG doctrines.

**83. RECENTLY, THE SUPREME COURT HAS RULED THAT SOME CHRISTIAN DENOMINATIONS' ACCUSATIONS AGAINST THE WORLD MISSION SOCIETY CHURCH OF GOD ARE DISHONEST CRITICISMS WITH NO EVIDENCE, BUT GROUNDLESS SLANDER BASED ON RELIGIOUS PREJUDICE.**

Diehard COG members like to post this "evidence article" as if it means something. First of all, the Korean Supreme Court ruled against spousal abuse, not the validity of "ahnsahnghong being god."

Secondly, you can't prove a negative, that's why that article is pointless. It's like me saying that "my pet invisible elephant is God" and you suing me and taking me to court for "lies and slander". The fact is, my invisible elephant cannot be proven to be untrue. Thus, as we see in this case here, by taking me to court for holy elephant slander, you yourself are slandering a negative. Therefore the courts have to rule against YOU for slandering me (EVEN THOUGH YOU ARE CORRECT) and not me for claiming an elephant to be divine.

**84. ISN'T IT TRUE THAT THIS WEBSITE IS FULL OF SLANDER AND IS BASED ON RELIGIOUS PREJUDICE?**

Nope. Those who contribute to this website have one thing in common. They are ex members of the WMS COG. Some are agnostic, some are atheist, some are Christian, some are Budhist, some are Catholic, some are Jewish and some are just plain existentialist. This website does NOT have a Christian agenda, it is ONLY WRITTEN WITH A CHRISTIAN TONE because that is the tone needed when addressing and debunking the "pseudo Christian" doctrines of the COG.

**85. SO YOU'RE NOT TRYING TO GET PEOPLE TO QUIT THE COG AND BECOME CHRISTIANS?**

100 percent ABSOLUTELY NOT. This website has a Christian tone solely because the World Mission Society Church of God is a pseudo-Christian cult. I need to talk about the Bible and mention Bible verses simply because that is the playing field on which this cult chooses to play.

**86. THE COG HAVE BEEN PHONING ME UP AND HOUNDING ME ALL THE TIME. SHOULD I BE SCARED THAT THEY MAY KIDNAP ME?**

No. These guys are friendly and are completely non violent and in my opinion, would never stoop to such an "ungodly" act. Do not be afraid of any physical harm.

**87. HOW DO I GET THE COG TO STOP PESTERING ME AND LEAVE ME ALONE?**

Next Tuesday or Saturday, simply don't turn up to their Church. You will then get a phonecall soon after. This phonecall will either be from the girl who recruited you (I assume it's a girl) or the deacon in charge of grooming you. They will ask you why you weren't there. At that point, the best thing to do is to simply be honest with them and be as firm as possible.

Simply say that you dont agree with their doctrines, and that you do not wish to meet with them again. Thank them for being kind and friendly and insist that you do not wish to study with them anytime in the future.

They will then question you and INSIST on scheduling more teaching sessions. They will say that you need to learn more. They will say that just "one more" session will open your eyes to the "truth". They will then ask you if you've spoken to anyone or have been praying with anyone "unclean". Say no. Tell them you pray alone with God. If you give them the

impression that you've been praying or talking with someone then they'll just start a whole new load of drama, which you want to avoid.

They will do anything to see you just one more time. They may even cry and mourn your "loss", as they honestly do believe the world will end soon. But the important thing is to just keep saying NO. No I wont be there on Saturday. No I wont meet with you for another teaching session. No I will not be there on Tuesday. They will keep hitting you with their routine, but it's important to be firm.

**88. THE COG SAY OBEYING THE SABBATH IS IN THE TEN COMMANDMENTS. WHY DON'T CHRISTIANS OBEY THE COMMANDMENTS?**

Because Christians follow the teachings of Christ and not the teachings given to the Old Testament Jews. Christ's New Covenant only mentions 6 commandments. So in a sense, Jesus updated the Old Testament commandments given to the Jews (for reasons explained in the Examination of Claims section). The COG have gone backwards, disregarded the New Testament and returned to Jewish teachings. Which is fine. Saturday, Sunday, it doesn't matter when you gather to worship. What matters is WHO you worship. And WHO the COG worship is not God.

**89. Can you explain something to me? The COG are teaching that in Genesis, when Jesus was hovering over the water, the water doesnt actually mean water, it means people. And the light represents his word. So they say that people were here other than Adam and Eve. They were the first people to follow Gods word. And they are saying that Song means harps playing and Hong means Russian waters. That is how they are breaking down the name "Ahnsahnghong". Also they are saying that in Revelations it says that the church will be singing a new song that will sound like harps and no one will recognise the songs.**

Focusing on these doctrines gives the COG more credit that it deserves. The Bible can literally be dissected and reverse engineered to mean anything, especially when you assign metaphorical meanings to things. But the COG's "meanings" are derived from english translations and don't take into account the original biblical languages.

**90. I was baptized in the name of Ahnsahnghong but no longer believe in the COG's teachings. Do I need to get baptized again? Is my original baptism (before meeting the COG) still legitimate? I feel depressed knowing that I was baptized into an organisation so evil.**

This is a question I get asked a lot. There's something definately psychologically traumatic about being baptized by the COG. A lot of people tell me that they feel really bad after being "tricked" into the baptizmal tub by the COG. But you should get over it with time. It's just the psychological trauma. This feeling will pass soon.

Remember, a baptismal is just a human ritual and in no way reflects what is in your heart. You were baptized in the name of Ahnsahnghong, but so what? If I poured a cup of water on your head and told you I'd baptized you in the name of a giant invisible elephant, would that affect you? No it wouldn't. But people tend to preconceive the COG as being "evil", and so they themselves feel "evil" on some level when baptized. Psychologically, it's as though the baptismal has alligned you with the COG. Of course this is the point of rituals such as this. It bonds men and women on a subconscious level.

Only now the bond has been reversed. You now view the COG as being "wrong" so naturally the act of binding you to it (ie baptism) now seems "wrong" as well. But it's all mind games and in no way reflects your spirituality, your mind or who you ultimately are.

**91. This website i sevil. I can't wait till the day I get to see your spirit be cast in burning sulfur forever and ever. You truly are one of the major enemies of God and her offspring in these last days. I will see you soon. Judgement is near. This is just blind hatred.**

You can't wait to see me burning in sulfur? Would you like to see my children burning in sulfur as well? My 6 year old son? What about my neighbours? They've never heard of Ahnsahnghong. Would you like to see them burning in sulfur as well? You've been so influenced by the COG that you've become paranoid and defensive. The "nuclear fire" will not come. The COG just wants you in a constant state of fear and guilt. Once you're afraid, they have you controlled.

**92. What did the Pharisees and those who opposed Jesus do 2000 years ago? You are no different. So using your faulty logic, Islam is the correct religion because Christianity persecuted it? Scientology is the correct religion because everyone persecutes it? Reverend Moon is God because everyone persecutes him, just like they did Jesus? Remember, NOBODY persecuted Ahnsahnghong and nobody persecutes the COG. This is a WEBSITE. You call a WEBSITE persecution? Your cult is so weak and false it fears a WEBSITE? How ridiculous is that. Stop trying to act like you're persecuted. The fact is, you lie and deceive people and you simply don't like people knowing the truth.**

**93. Why are the COG telling me to make internet blogs?**

The COG have begun instructing all those with internet to make blogs and to basically fill the internet with news of Ahnsahnghong. The aim is to flood the net with propoganda and distract people away from sites about cults and mind control.

**94. Mother must be all knowing and omniscient because she sent me a postcard. Only God could know who I am and where I live.**

Unlike regular churches, when you're baptized into the COG, your pastor takes your name, address, phone number and all other personal details. Mother doesn't magically "know" who you are any where you live. The COG pastors mail the

membership details to the Head Office back in Korea, where postcards are made and sent out. Mother doesn't actually write these postcards nor does she know who you are or where you live.

95. They denied Ahnsahng hong as they did Jesus. They made Ahnsahng hong carry stones up hills and treated him badly. Ahnsahng hong suffered as Jesus suffered and you continue to deny him.

Ahnsahng hong can only be "denied", "persecuted" and "made to carry rocks" if he claimed to be God. But the COG believes Ahnsahng hong came in secret and that no one knew of his coming or that he was God. Thus, Ahnsahng hong can only be "denied" if he doesn't come in secret. Ahnsahng hong can not "come in secret" and also "be denied as God". It's contradictory.

Either he came, claimed to be God and was mistreated by unbelievers for doing so (ie- carrying stones etc) or he came, did not claim to be God, and lived a life of hardship simply because he loved carrying stones. Both notions are silly.

The truth is that he lived in a very nice house, had a driving license, a car, a television, running water, electricity and modern appliances. He lived as a normal person, did normal things, never carried rocks and was certainly never persecuted, mistreated or nailed to a cross. The COG funded "training" videos paint a completely false, romanticised and overly mystical view of Ahnsahng hong.

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