



CORPORATE STATEMENT
April 5, 2004

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**Harvest House and Authors Address Newest Allegations
from The Local Church and Living Stream Ministry**

On March 12, 2004, we (Harvest House Publishers and authors John Ankerberg and John Weldon) spoke publicly for the first time about the defamation lawsuit filed against us on December 31, 2001 by The Local Church and Living Stream Ministry (LSM). We placed a Corporate Statement and a Questions & Answers document on our website at www.harvesthousepublishers.com, choosing to speak after two years of silence in order to provide information about the progress of the lawsuit and to correct misrepresentations about the case that had been posted for more than a year on The Local Church's website www.contendingforthefaith.org. At issue in the suit is the book *Encyclopedia of Cults and New Religions*, which The Local Church and LSM claim is libelous in regard to them.

Immediately after we posted our Corporate Statement and Questions & Answers document on the Internet, The Local Church and LSM published a new and expanded set of allegations against us, which were posted on their website on March 19, 2004. While we are committed to letting our attorneys continue to defend us in the legal venue, we also believe it is important to defend the integrity of our authors and set the public record straight with regard to the lawsuit and the issues surrounding it. With that in mind, we trust the following information will prove helpful to those who desire a clear, accurate, and more complete understanding of the case.

In addition, know that on this website, Harvest House and the authors will continue to provide periodic updates on the progression of the lawsuit as we deem appropriate.

The judge's recent ruling is not a decision against Harvest House, but merely allows the case to move forward.

In the fall of 2003, Harvest House and the authors submitted a second motion for summary judgment to the 80th District Court of Houston, Texas, for the purpose of requesting that the judge dismiss the case on the basis that the language of the *Encyclopedia* was not defamatory as a matter of law. On March 9, 2004, the judge ruled on the motion and stated simply that it was denied. Harvest House and the authors, in their Corporate Statement published three days later on March 12, 2004, said, "This action is not a ruling against Harvest House and the authors, but simply allows the case to move forward."¹

Here's why:

- For the judge to deny the motion does not mean The Local Church has prevailed in its lawsuit, and it does not prove the book is defamatory.
- The motion denial only means that we could not persuade this judge that the case should be thrown out as a matter of law.

The *Encyclopedia* does not accuse The Local Church and LSM of criminal and immoral conduct.

We stand firm in our conviction that the *Encyclopedia* does not defame The Local Church and LSM, and we never intended for it to do so. This is irrefutably confirmed by these three simple facts, among others:

1. The Local Church and LSM are never named in the Introduction of the *Encyclopedia*, where the allegedly defamatory language is located.
2. In the *Encyclopedia's* 1¼-page chapter on The Local Church, absolutely no criminal or immoral behavior is attributed to The Local Church/LSM.
3. While the Introduction to the *Encyclopedia* mentions some general characteristics of cults, it does not state anywhere that these characteristics apply to all the groups in the book. In fact, the Introduction explicitly states, "Not all groups have all the characteristics" (p. XXIII).

Harvest House and the authors have correctly represented the main issue in the lawsuit.

On their website, The Local Church states, "The defendants continually attempt to divert attention from the real focus of the case by trying to portray it as a theological debate. In so doing, they have clearly misrepresented the nature and facts of the case, which has never been about theology."²

Contrary to The Local Church's allegation, Harvest House and the authors are very much aware The Local Church claims it has been accused of criminal and immoral behavior, and we have never portrayed the lawsuit as a theological debate. We make this clear in our Questions & Answers document at www.harvesthousepublishers.com/about_cstatementfaq.cfm under the question "What is the lawsuit about?":

The Local Church claims that *The Encyclopedia of Cults and New Religions...* defames The Local Church, The Local Churches, and Living Stream Ministry by accusing them of criminal and immoral conduct.³

Without question, Harvest House has accurately stated the nature of the lawsuit.

What is of tremendous concern to us, however, is the way The Local Church has misrepresented the *Encyclopedia*. On its website www.contendingforthefait.org, it claims that the *Encyclopedia's* Introduction "clearly labels all of the groups in the book as being guilty of the most deplorable, illegal, and immoral acts."⁴

However, the *Encyclopedia* never states that all cults engage in illegal conduct. In fact, a large percentage of the groups in the book have no criminal conduct attributed to them whatsoever.

What's more, authors Ankerberg and Weldon very clearly state in the *Encyclopedia's* Introduction the purpose and focus of the book:

- "to evaluate religious truth claims"⁵
- "our analysis in this *Encyclopedia* centers on doctrinal and apologetic issues"⁶
- "our purpose is 1) to show people what these groups really believe... 2) to show that their teachings are not biblical... and 3) to assist people in understanding what may be expected of them spiritually and otherwise before they join a cult"⁷

So, The Local Church cannot forcibly project the few isolated and generally stated comments in the Introduction upon every group in the book, because the overwhelmingly dominant theme of the 731-page volume is religious

claims, beliefs, and theology.

Indeed, the *Encyclopedia's* 1¼–page chapter on The Local Church deals solely with the theology and doctrinal beliefs of The Local Church. There are absolutely no comments about criminal or immoral behavior in this chapter. Very specifically, the chapter examines The Local Church's views on God, Jesus, the Holy Spirit, the Trinity, salvation, man, sin, Satan, the Fall, the second coming, the Bible, heaven, and hell.⁸ Through the entire litigation process, The Local Church has never challenged this chapter as being defamatory of them.

The *Encyclopedia's* chapter on the teachings of The Local Church quotes and documents those teachings accurately.

On one of their websites, The Local Church boldly claims “the book twists our teachings beyond recognition.”⁹ And in their original complaint to the court, The Local Church/LSM wrote, “The section of the *Encyclopedia* entitled ‘The Local Church’ grossly distorts Plaintiffs and takes out of context many statements in order to present a misleading and incorrect view of Plaintiffs [LSM/Local Church].”¹⁰

The fact is, the brief comments in the *Encyclopedia* chapter on The Local Church are based on a careful examination of the literature published and distributed by Living Stream Ministry. The 1¼–page chapter includes five accurately documented quotes, all of which were excerpted directly from Local Church publications. Every single quote provides information about its original source, so their accuracy can readily be verified by anyone who desires to check them.¹¹

Also, four out of the five Witness Lee or Local Church quotes stand completely on their own and speak for themselves, with no commentary whatsoever from the authors. This makes it impossible for them to have been distorted or taken out of context.

Finally, after The Local Church filed its lawsuit, Harvest House and the authors went back through the *Encyclopedia* and did a careful and extensive review of its contents in relation to The Local Church, and concluded that it is indeed accurately representative of The Local Church's teachings.

After the *Encyclopedia* was published, The Local Church and LSM aggressively threatened to take legal action, and the authors prepared a new chapter specially for settlement purposes, which The Local Church and LSM never responded to.

The Local Church and LSM make statements on their website that cause our authors to appear inconsistent and self-contradictory when they declare, “Despite the fact that [The Local Church was] included in their *Encyclopedia* of cults, the authors have written, ‘Theologically speaking, Witness Lee and the Local Church do not constitute a cult...nor do the characteristics of cults in the Introduction generally apply to them.’ Neither of these statements was included in the published editions of their book.”¹³

In citing those words, several very significant facts were omitted by The Local Church/LSM:

- The authors wrote those statements not before the book was published, but nearly two years *after* publication, during the process of legal settlement negotiations—while being aggressively threatened with legal action by The Local Church and LSM. The statements were intended for a proposed settlement chapter that, ultimately, The Local Church never responded to.
- The proposed chapter was submitted by a Harvest House attorney to The Local Church with a letter stating that it was “for settlement purposes only and without admitting that there is anything wrong with the material in the *Encyclopedia*.”¹⁴
- While the authors began the proposed chapter by saying The Local Church “is not a cult,” they went on to quote Dr. Walter Martin, who said, “...Witness Lee and the Local Church teach error concerning the doctrine of God, Christ, man, sin, salvation, and the church. Witness Lee is not a sound Bible teacher, and the Local Church is cultic in many ways, both doctrinally and in structure....”¹⁵

- The proposed chapter was more than 10 pages in length and went into much greater detail about The Local Church's many erroneous teachings than did the 1¼-page chapter that was originally published in the *Encyclopedia*.
- After the authors sent their proposed chapter to The Local Church's attorney on December 14, 2001, they continued to do extensive research on the group. After several weeks, the authors found absolutely no evidence that refuted their *original* conclusion that The Local Church was a cult on account of their serious doctrinal deviations from biblical, orthodox Christianity. So on February 11, 2002, the authors sent a revised proposed chapter to The Local Church, in which they completely **struck out** the words "[The Local Church] is not a cult, nor do the characteristics of cults in the Introduction generally apply to them."¹⁶

As stated earlier, The Local Church never responded to the proposed settlement chapter and yet has become so bold as to use the authors' **never-published** and **struck out** statement that The Local Church "is not a cult" to undermine their credibility and call into question the integrity of their published convictions.

The *Encyclopedia's* chapter on The Local Church was accurate, up to date, and based on thorough research.

The Local Church/LSM alleges that "author John Weldon admitted in correspondence that his research was 15–20 years old, that he may have made mistakes..."¹²

First, did John Weldon admit to making mistakes? Because The Local Church's website fails to provide Weldon's own words for verification's sake, we have provided them here.

This is excerpted from an email John Weldon sent to Jim Moran, an expert on The Local Church:

...I want to be sure I have not misquoted [The Local Church] in any way. This chapter was one of 65 I wrote 15–20 years ago at a rate of (researching & writing) 100–200 pages per month, so it's possible I made a mistake. (email dated November 30, 2001)

What did John Weldon communicate regarding any "possible" mistakes? He said, "I want to be sure I have *not misquoted them* in any way." Clearly, Weldon **didn't** want mistakes in his work, and he invited another researcher's scrutiny for the sake of ensuring absolute accuracy. That Weldon was extra cautious and took steps to make sure he did not misquote anyone reveals the integrity with which he approached his writings—and is explicitly contrary to The Local Church's attempt to portray him as having "admitted...he may have made mistakes."

Second, what about the fact that Weldon's writings about The Local Church were based on material originally written 15–20 years ago? The Local Church neglects to mention two important points: 1) The words quoted from Witness Lee some 15–20 years ago are still found in books available today from Living Stream Ministry. So, the quoted words continue to accurately reflect the teachings of Witness Lee and The Local Church. And 2) in the *Encyclopedia's* chapter on The Local Church, two of the quoted texts are from Living Stream publications dated 1996–97 and 1999, which means Weldon's research continued right up to the time the book was published in 1999. So, contrary to what The Local Church implies, the passage of time did not invalidate Weldon's research, and Weldon did not neglect to consider the most recent Local Church publications in his research.

As for the thoroughness of Weldon's research, his 1¼-page chapter on The Local Church was based on an original and never-published chapter of about 200 pages with almost 400 footnotes. Such thoroughness clearly speaks for itself.

In producing the *Encyclopedia*, the authors stressed the use of direct quotes in order to allow religious and cult leaders to speak for themselves.

According to The Local Church, "the authors' written instructions for the editing of this book were to use the most

'damaging' and 'damning' quotes and concentrate on the 'demonization' of the leader and the followers in order to really 'hit these guys hard.'" The Local Church goes on to say, "These instructions were carried out in editing the book, resulting in the language found in it."¹⁷

In support of this allegation The Local Church cites a memo John Weldon wrote, which contained instructions to his editor. Yet once again The Local Church does not provide the full context of Weldon's words—in this case, the words "damaging," "damning," and "hit these guys hard." So that we can get a clear picture of what Weldon was saying and why, let's look at a key paragraph that appears in the memo:

Again the theme is to retain the best of each chapter, section by section, the most relevant or important material. Retain the best and strongest, the clearest and most powerful quotes [of religious and cult leaders] for documentation. Always use the most damaging material. We have to have the best stuff that's really going to hit these guys hard.¹⁸

In the context of the paragraph, Weldon's words about "damaging" and "hit these guys hard" become significantly clearer. It's important to keep in mind that encyclopedia entries are typically short and not exhaustive (consider, for example, the entries found in *Encyclopedia Britannica*), and thus when an encyclopedia presents a particular topic, it makes perfect sense to use "the best and strongest, the clearest and most powerful quotes for documentation." Because of space limitations, Weldon was stressing the need for quotes that could stand as clear and succinct representatives of what any given group teaches.

Note especially that John Weldon is talking about using "powerful quotes"—that is, the words of the religious and cult leaders *themselves*. He wanted to "hit [them] hard" *with their own words—not* with unsubstantiated attacks of any kind. He wanted readers to see exactly what these leaders and groups teach and believe based on statements from their own mouths.

In fact, Weldon, throughout his instruction memo, went to extraordinary lengths to emphasize the necessity of letting the groups in the book speak for themselves:

- o "Always include at least a 3 to 8 sentence quote so there's enough material that people get a flavor of what's being said"¹⁹
- o "Keep in mind what we're trying to do is provide the most powerful, concise, and best information from each group"²⁰
- o "Always cite quotes for documentation. In other words, always put in quotes. Without these, the text is pretty much useless since it's my word against theirs"²¹
- o "Always put in the best, clearest, most powerful quotes..."²²
- o "...whenever you can, leave the specific claims of the sect in"²³
- o "...the idea is to document what the cult believes..."²⁴
- o "...don't forget you'll need to do the footnotes on all these too"²⁵

Though Weldon may seem rather strong when he uses the words "damaging" and "hit these guys hard," note that Weldon absolutely did not advocate malice, misrepresentation, or distortion. Also, just because a quote is damaging does *not* make it inaccurate. For example, Witness Lee taught that

Roman Catholicism and Protestantism, as well as Judaism, all...[have] become an organization of Satan....²⁶

Is that a "damaging" and hard-hitting quote? In the ears of Roman Catholics, Protestants, and Jews, most

definitely yes!

And is it accurately attributed to Witness Lee? Absolutely.

What about The Local Church's statement that John Weldon wanted editors to "concentrate on the 'demonization' of the leader and the followers"? Again, The Local Church didn't include the context of Weldon's words in their allegation. Here is the context:

On the occult section, the quotes you want to concentrate on are the founder or leader's demonization, **if that exists**, and the follower's demonization, **if that exists**....²⁷

The key words here are "if that exists," which is stated not once, but twice. So for The Local Church to imply the authors viewed every religious group leader or all followers as demonized is completely misleading. That simply is not the case. In fact, properly understood, Weldon's reference to demonization can only apply to those who themselves profess to be possessed by spirits—a phenomena usually limited to Eastern gurus or occult leaders and that most definitely does not apply to all religious groups.

And finally, why did Weldon give instructions to find the strongest, most powerful quotes? According to the authors, the original manuscript for the *Encyclopedia* was over 7,000 pages long, and the material had to be condensed significantly. This meant they would not be able to use the large numbers of quotes originally provided in each chapter. Hence, it was necessary for the editor to "retain the best and strongest" quotes that most powerfully and succinctly communicated what a religious group teaches or believes.

And, in spite of all the condensing that was done, there are still more than 1,350 direct quotes in the *Encyclopedia*.

Contrary to The Local Church's accusations, the *Encyclopedia* clearly defends the right of cults and religious groups to enjoy freedom of speech and religion.

Harvest House, in its Corporate Statement of March 12, 2004 that comments on the lawsuit, cited these words from its lead attorney, Shelby Sharpe:

Freedom of expression on the written page as well as healthy debate when discussing religious subjects need to be encouraged and protected with absolute diligence. This case is crucially relevant to all print media, and especially to the members of the Evangelical Christian Publishers Association. Indeed, Harvest House and the authors must prevail in order to prevent a serious "chilling effect" on the exercise of First Amendment rights.²⁸

The Local Church responded on their website by saying,

In this paragraph, HH inserts the Evangelical Christian Publishers Association (ECPA) into this issue as if they were protecting the First Amendment rights of ECPA members. While ECPA has taken no formal position concerning this lawsuit, the First Amendment rights (free exercise of religion) of at least one ECPA member have been significantly "chilled" by the publication of their book.²⁹

Note particularly The Local Church's accusation that the *Encyclopedia* has "significantly 'chilled'" their First Amendment rights, which they define, in their quote above, as "free exercise of religion."

But that simply is not possible. To deny someone his or her First Amendment rights means to deny him or her freedom of speech or the freedom to follow whatever religious beliefs he or she wants. The *Encyclopedia* does not deny either of those rights of The Local Church or Living Stream Ministry. In no way does the book attempt to silence The Local Church or censor it. The Local Church and LSM have every right to teach and publish whatever they want, and we recognize their right to do so.

The *Encyclopedia* and Freedom of Speech

What the *Encyclopedia* actually does is hold The Local Church's teachings up against the standard of God's Word, the Bible. It offers a critique or commentary on Local Church doctrines and beliefs. This kind of "review by comparison or examination" is a perfectly legitimate practice that is widespread in today's newspapers, magazines, and books. Freedom of speech allows writers to express, in a responsible manner, their divergent opinions and criticisms on all sorts of topics. This is why, for example, political commentators can voice agreement or disagreement with one another and movie critics can voice approval or disapproval of whatever films they choose to review. Freedom of speech allows for healthy debate, and everyone is entitled to express their views or opinions. Likewise, in the *Encyclopedia*, the authors discuss the beliefs of 57 different religious groups and do so responsibly and accurately, using biblical truth as the plumb line.

In a similar fashion, The Local Church and Living Stream Ministry, in their own books and publications, have offered their particular perspective on Christianity. For example, they say...

- "Christianity is not focused on the divine economy but is a human religion saturated with demonic and satanic things."³⁰
- "Christianity is just the expression of dead religion...."³¹
- "Today we are not bound to any kind of religion, not even to Christianity. Inasmuch as Christianity is a religion, we have nothing to do with it. Christianity is not Christ Himself."³²

Freedom of speech grants The Local Church full liberty to express such opinions, but The Local Church doesn't seem to recognize that freedom of speech is a two-way street. If they can voice strong disagreement with Christianity, then Christians can certainly voice disagreement with The Local Church.

The *Encyclopedia* and Freedom of Religion

In addition, the *Encyclopedia* upholds religious freedom. The authors emphatically state that "responsible religious freedom must be defended, vigorously, *including* the responsible religious freedoms of cults and new religions."³³ They also declare, "...Christians are willing to accept the beliefs and practices of others and to respect their right to hold them; after all, this is a God-given right."³⁴

It's very clear, then, that the *Encyclopedia* does not speak against freedom of speech or religion.

By contrast, the lawsuit filed by The Local Church and LSM *does* pose a serious threat to freedom of speech. That's because the lawsuit is built entirely upon on the premise that an isolated reader might somehow connect two totally unrelated portions of a book that were never intended to be connected. The lawsuit alleges that some very general statements in the Introduction of the *Encyclopedia* "clearly labels all of the groups in the book as being guilty of the most deplorable, illegal, and immoral acts,"³⁵ when, in fact, there is absolutely no language in the Introduction that attributes those behaviors to all the groups in the volume.

If The Local Church's lawsuit prevails, then a *writer* could be declared guilty of defamation simply because of a *reader's* misinterpretation of two isolated and unrelated statements. Media organizations, and publishers in particular, would become dangerously vulnerable to lawsuits filed merely on the basis of misconstrued words. Publishers would not have the freedom to publish legitimate and factually based differences of opinion without the fear of being punished because words that were never intended to be connected are somehow forced together to say something that was never said in the first place. This could change the face of publishing forever, for in such a climate, the threat of unmerited lawsuits would be so great as to have a chilling effect on the free expression of ideas and opinions.

Harvest House adhered to professional editorial practices in the course of producing the *Encyclopedia*.

The Local Church alleges that "under oath, HH personnel admitted that no one at HH had read the book prior to

publishing it.”³⁶

That is quite a blatant accusation in light of what Harvest House editor Barb Gordon clearly stated under oath in her deposition:

Q: Okay. Have you read the book?

A: A good portion of it. (page 23, lines 20-21)

Q: Do you remember ever being referred to by Betty Fletcher as the in-house eyes?

A: Yes.

Q: Okay. Do you have an understanding of what she meant by that?

A: Yes.... I would be the in-house eyes, the Harvest House employee that went through the manuscript after, and merged and caught any formatting consistencies, punctuation, grammar, et cetera. (page 63, lines 13-18, 25; page 64, lines 1-3)

In making the allegation that “no one at HH had read the book,” not only did The Local Church omit Barb Gordon’s testimony, but it also failed to acknowledge the following facts:

1. It is a fairly common practice for publishing houses to hire out-of-house editors to edit a book, especially if that editor is knowledgeable about the topic of the book. Harvest House did exactly that, and hired an editor familiar with the subject of comparative religions.
2. Harvest House editor Barb Gordon, under oath, not only stated that she read a good portion of the book, but she “merged” it (which means checking and compiling the two proofreaders’ corrections for the entire book), and also “helped cut some of the material because the book was too long.”³⁷ For such merging and cutting to be possible, this Harvest House editor had to have significant, direct interaction with the 731-page book.
3. The two out-of-house Harvest House proofreaders assigned to work on the *Encyclopedia* already had ample experience working on Harvest House books and were familiar with Harvest House’s expectations and requirements for their role in the editorial process. These proofreaders, though they worked out-of-house, were in fact employees of Harvest House. (Previously we had incorrectly stated the proofreaders were “hired,” but that implies they were freelance workers, and they were actually employees.)

It’s significant to note that when The Local Church threatened to sue Harvest House, the *Encyclopedia* was carefully reviewed, and no errors in fact were found. This is affirmation that the authors and editors fulfilled their responsibilities to ensure the book was an accurate and quality product.

Harvest House acted in a responsible manner when it hired an out-of-house editor familiar with the topic of comparative religions.

And Harvest House *did* have an in-house editor interact substantially with the book.

Harvest House’s editorial practices are based on one of the publishing industry’s most respected authorities on editorial standards.

The Local Church, in one of its court documents, made this allegation:

In their depositions, Harvest House employees repeatedly denied that their company operated on the basis of fixed editorial standards, policies, or practices.... None of the 12 current or former Harvest House employees deposed in the course of discovery identified any specific policy or practice that could have any bearing upon the substance of

pre-publication manuscripts.³⁸

Did Harvest House employees *repeatedly deny* that the company follows any fixed editorial standards, policies, or practices? The fact is, Harvest House employees *repeatedly affirmed* that Harvest House adheres to one of the publishing industry's most respected guidebooks of fixed editorial standards, policies, and practices—*The Chicago Manual of Style*:

Q. Have you ever been exposed to any rules or guidelines that are viewed as good publishing practice by the publishing industry?

A. Yes.

Q. In what context?

A. *The Chicago Manual of Style*. (LaRae Weikert deposition, 14:2-7)

Q. Of the style guides that we have just discussed, are any of them adopted by the editorial management of Harvest House?

A. In general, yes. *The Chicago Manual of Style*. (Steven Miller deposition, 29:21-24)

Q. Do you follow *New York Times Style Guide*, *AP Style Guide*, any of the recognized books that give publishers advice on how to proceed in situations like that?

A. We generally follow *Chicago Manual of Style*.

Q. Do you follow the procedures set forth in that book?

A. We tell editors to use *The Chicago Manual of Style* as their reference. (Carolyn McCready deposition, 27:8-12, 22-25)

Q. Are there any outside, non-Harvest House created style books or manuals that the editorial department is instructed to use?

A. Yes.

Q. Which?

A. *Chicago Manual of Style*. (Barbara Gordon deposition, 46:13-18)

Q. During your tenure as both editor-in-chief and later vice president of editorial did Harvest House utilize any type of style books?

A. We used the *Chicago Manual of Style*. (Eileen Mason deposition, 52:6-9)

So Harvest House does use an authoritative and recognized guide for editorial practice—*The Chicago Manual of Style*, a substantial editing guidebook that runs 956 pages in the current 15th edition.

Thus The Local Church, in its argument submitted to the court, completely misrepresented Harvest House by failing to acknowledge the company does indeed abide by fixed and acceptable editorial standards.

Harvest House is fully committed to correcting and clarifying future misrepresentative allegations anticipated from The Local Church and Living Stream Ministry.

While it is discouraging to be misrepresented in a forum as public as the Internet, we see the lawsuit as an opportunity to practice what Jesus taught: "Love your enemies and pray for those who persecute you" (Matthew 5:44). As we all know, when a person is attacked, the natural human reaction is to strike back. But that's not what Jesus has called us to do. The lawsuit has given us the opportunity to...

- pray for those who are in The Local Church
- draw closer to the Lord in greater dependence upon Him
- and realize more than ever the importance of "speaking the truth in love" (Ephesians 4:15)

At every step in the course of defending ourselves in this lawsuit, we want to respond in such a way that our every action and word will bring glory to God and affirm His truth. We are committed to continuing to speak the truth in love, and your prayers to that end are greatly appreciated.

For more information, see the following:

Harvest House's initial Corporate Statement about this lawsuit, issued 03/12/04

Questions and Answers regarding the lawsuit, issued 03/12/04

Notes

1. Harvest House Publishers Corporate Statement, posted March 12, 2004, at www.harvesthousepublishers.com/about_cstatement1.cfm.
2. See point 2b in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefaith.org/libel-litigations/harvest-house-et-al/response.html.
3. See the Harvest House "Questions & Answers" document, under the question "What is the lawsuit about?" at www.harvesthousepublishers.com/about_cstatementfaq.cfm#whatabout.
4. See the answer to question 1 on The Local Church's "Questions and Answers" document at www.contendingforthefaith.org/libel-litigations/harvest-house-et-al/questions-answers-litigation.html#0.
5. John Ankerberg and John Weldon, *Encyclopedia of Cults and New Religions* (Eugene, OR: Harvest House Publishers, 1999), p. XX.
6. *Ibid.*, p. XXI.
7. *Ibid.*, p. XXI.
8. *Ibid.*, pp. 211-12.
9. See the answer to question 2 on The Local Church's "Questions and Answers" document at www.contendingforthefaith.org/libel-litigations/harvest-house-et-al/questions-answers-litigation.html#0.
10. "Plaintiffs' Original Petition," filed December 31, 2001, p. 6, point 7.
11. John Ankerberg and John Weldon, *Encyclopedia of Cults and New Religions* (Eugene, OR: Harvest House Publishers, 1999), pp. 211-12. The sources cited are 1) Witness Lee, *Christ versus Religion*, p. 157; 2) Kerry S.

Robichaux, "The Divine Trinity in the Divine Economy," *Affirmation & Critique*, April 1999, p. 37; 3) Witness Lee, *How to Meet*, p. 31; 4) Witness Lee, *How to Meet*, pp. 112–13; 5) *Affirmation & Critique*, the Living Stream Ministry Quarterly, 1996–97.

12. See point 3a and also endnote 8 in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefaitth.org/libel-litigations/harvest-house-et-al/response.html.

13. See point 3a in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefaitth.org/libel-litigations/harvest-house-et-al/response.html.

14. Letter from Harvest House attorney Leonard D. DuBoff dated December 14, 2001, and sent to Local Church attorney Barry B. Langberg.

15. Walter Martin, *The New Cults* (Ventura, CA: Regal, 1980), pp. 392–93, 405.

16. Letter from Harvest House attorney Leonard D. DuBoff dated February 11, 2002.

17. See point 3b in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefaitth.org/libel-litigations/harvest-house-et-al/response.html.

18. Exhibit 5 from John Weldon's deposition, p. 4.

19. *Ibid.*, p. 1.

20. *Ibid.*, p. 3.

21. *Ibid.*, p. 4.

22. *Ibid.*

23. *Ibid.*, p. 5.

24. *Ibid.*, pp. 5–6.

25. *Ibid.*, p. 7.

26. The New Testament Recovery Version, note 9⁵, third printing, 2001 (Anaheim, CA: Living Stream Ministry, 1991), p. 1247.

27. Exhibit 5 from John Weldon's deposition, p. 4 (emphasis added).

28. Harvest House Publishers Corporate Statement, posted March 12, 2004, at www.harvesthousepublishers.com/about_cstatement1.cfm.

29. See point 4 in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefaitth.org/libel-litigations/harvest-house-et-al/response.html.

30. Witness Lee, *The God-Ordained Way to Practice the New Testament Economy* (Anaheim, CA: Living Stream

Ministry, 1987), p. 35.

31. Witness Lee, *Christ Versus Religion*, fifth printing, 1999 (Anaheim, CA: Living Stream Ministry, 1971), p. 184.

32. Witness Lee, *The Central Thought of God*, first edition (Anaheim, CA: Living Stream Ministry, 1998), p. 73.

33. John Ankerberg and John Weldon, *The Encyclopedia of Cults and New Religions* (Eugene, OR: Harvest House Publishers, 1999), p. XXVIII (emphasis added).

34. *Ibid.*, p. XXVI.

35. See the answer to question 1 on The Local Church's "Questions and Answers" document at www.contendingforthefait.org/libel-litigations/harvest-house-et-al/questions-answers-litigation.html#0.

36. See point 5 in "Living Stream Ministry and Local Churches Respond to Harvest House Corporate Statement on Recent Court Ruling," posted March 19, 2004, at www.contendingforthefait.org/libel-litigations/harvest-house-et-al/response.html.

37. Deposition of Barbara S. Gordon at page 18, lines 22 through 25.

38. "Sur-Reply to Defendants' Second Motion for Summary Judgment," p. 17.