

1 A HE HAS, AND LET ME -- HE HAS BUILT AN ARGUMENT ON THE  
2 NEXT PAGE THAT LEE IS NOT ONLY THE LEADER OF THE CHURCH, BUT  
3 THAT HE SEES HIMSELF AS GOD'S ORACLE.

4 THE IMPORT OF SEEING HIMSELF AS GOD'S ORACLE IS TWOFOLD.

5 NUMBER ONE, IF YOU ARE SPEAKING GOD'S WORD, THEN YOUR  
6 WORD CARRIES AUTHORITY AND YOU ARE AN AUTHORITARIAN FIGURE  
7 WHO MUST BE LISTENED TO.

8 SECONDLY, IF YOU ARE SPEAKING AS GOD'S ORACLE YOU ARE  
9 PUTTING YOUR WORDS AS AUTHORITY BESIDE OR ABOVE THE BIBLE;  
10 THEREFORE, YOU ARE MOVING YOURSELF OUTSIDE THE EVANGELICAL  
11 KEM BY DENYING THE ABSOLUTE UNIQUE AUTHORITY OF THE SCRIPTURE.

12 Q BY ORACLE, COULD I REDUCE THAT TO A SIMPLE TERM, THAT  
13 HE IS -- MR. DUDDY IS REPRESENTING THAT MR. LEE IS CONTENDING  
14 HE IS GOD'S MOUTHPIECE?

15 A THAT IS AN APT PARAPHRASE.

16 THE COURT: BY THE WAY, MR. MORGAN, I THINK WE  
17 OUGHT TO TAKE A RECESS FOR THE REPORTER. WHY DON'T WE HAVE  
18 AN EIGHT OR TEN MINUTE RECESS AND GIVE THE REPORTER A CHANCE  
19 TO --

20 MR. MORGAN: CERTAINLY.

21 (RECESS TAKEN.)

22 Q (BY MR. MORGAN) DOCTOR, WE WERE COVERING TWO QUOTES ON  
23 PAGE 61 WHICH SORT OF MADE THE REPRESENTATION THAT WITNESS  
24 LEE WAS SAYING THAT HE WAS GOD'S ORACLE OR GOD'S MOUTHPIECE.

25 IS THAT A FAIR AND ACCURATE REPRESENTATION OF WHAT  
26 WITNESS LEE IS SAYING?

27 A NO, IT ISN'T.

28 Q IS IT COMPLETELY DISTORTED?

1 A COMPLETELY.

2 Q NOW CAN YOU TELL THE COURT WHERE THE QUOTES COME FROM?

3 A THE TWO QUOTES WHICH ARE FOUND IN THE MIDDLE OF PAGE 61  
4 SAY "IS THIS MY TEACHING? NO, THIS IS REVELATION OF GOD IN  
5 THE BIBLE. IT WAS BURIED. IT WAS COVERED FOR CENTURIES  
6 BUT BY HIS MERCY IT HAS BEEN DISCOVERED."

7 IN THE ENGLISH PUBLISHED VERSION OF THE GOD-MEN THAT  
8 APPEARS DIRECTLY ACROSS IN THE MIDDLE OF THE PAGE ON  
9 PAGE 62, YOU WILL NOTICE THAT THE TWO SENTENCES ARE SEPARATED  
10 BY ELLIPSES.

11 Q BEFORE YOU GET THERE I WANT TO ASK YOU SOMETHING. IS  
12 THIS SUPPOSED TO BE TAKEN FROM SOME OF WITNESS LEE'S  
13 WRITINGS?

14 A BOTH QUOTES, AND THERE ARE TWO QUOTES INSTEAD OF ONE  
15 ARE TAKEN FROM A BOOK ENTITLED "HOW TO MEET."

16 ("HOW TO MEET" BY WITNESS LEE MARKED  
17 FOR IDENTIFICATION AS PLAINTIFF'S  
EXHIBIT 11.)

18 Q LET ME SHOW YOU --

19 THE COURT: HOW TO WHAT?

20 THE WITNESS: HOW TO MEET.

21 Q (BY MR. MORGAN) LET ME SHOW YOU WHAT'S BEEN MARKED AS  
22 EXHIBIT 11, AND DOES THAT CONTAIN THE PAGES FROM WHICH THE  
23 QUOTES WERE TAKEN?

24 A YES, IT DOES.

25 MR. MORGAN: I'D OFFER THAT INTO EVIDENCE, YOUR  
26 HONOR.

27 THE COURT: MAY BE RECEIVED.

28 Q (BY MR. MORGAN) CAN YOU IDENTIFY FOR THE COURT WHERE

1 THE QUOTES ARE THAT ARE USED?

2 A THE QUOTES ARE OUT OF ORDER. THE SECOND QUOTE APPEARS  
3 FIRST IN THE BOOK BEGINNING WITH THE WORDS "IS THS MY  
4 TEACHING? NO." THAT QUOTE APPEARS ON PAGE 94 AT THE  
5 BEGINNING OF THE LAST PARAGRAPH.

6 THE PREVIOUS QUOTE WHICH "WHEN I COMMANDED MY SPIRIT"  
7 APPEARS ON PAGE 79 AT THE END OF THE FIRST PARAGRAPH IN  
8 THAT NEW SECTION, "ONE WITH LORD AND SPIRIT."

9 Q WHAT MR. DUDDY HAS DONE THEN IS HE HAS TAKEN ONE QUOTE  
10 AND PUT IT AHEAD OF ANOTHER QUOTE WHEN IT WASN'T THAT WAY IN  
11 WITNESS LEE'S WRITINGS, IS THAT RIGHT?

12 A WHAT MR. DUDDY HAS DONE IS HE HAS TAKEN TWO WIDELY  
13 SEPARATED QUOTES FROM THE MIDDLE OF PARAGRAPHS AND REVERSED  
14 THEM IN ORDER AND RAMMED THEM TOGETHER SO TO SPEAK.

15 THE ELLIPSES IMPLIES THAT ONE QUOTE FOLLOWS THE OTHER  
16 ONE IN FAIRLY CLOSE PROXIMITY WITH ONLY IRRELEVANT MATERIAL  
17 BEING DELETED.

18 YOU WOULD NOT USE AN ELLIPSES TO FOLLOW A QUOTE  
19 SEVERAL PAGES LATER. IT MIGHT BE IN THE NEXT PARAGRAPH BUT  
20 CERTAINLY NOT MUCH FURTHER THAN THAT.

21 Q LET'S DO THIS. LET'S TAKE --

22 THE COURT: COULD WE SEE WHERE THAT APPEARS -- IS  
23 IT PAGE 61?

24 THE WITNESS: RIGHT IN THE MIDDLE OF THE PAGE.

25 Q (BY MR. MORGAN) SEE WHERE IT SAYS "WHEN I COMMANDED MY  
26 SPIRIT" AND THEN THE OTHER ONE IS IMMEDIATELY BELOW THAT.  
27 "IS THIS MY TEACHING? NO." THE IMPACT THAT IS CREATED IN  
28 MR. DUDDY'S BOOK IS WITNESS LEE IS SAYING "I AM SPEAKING FOR

1 GOD AND I AM HIM SPEAKING AND THEREFORE WHAT I AM SAYING IS  
2 MORE IMPORTANT THAN THE BIBLE." IS THAT BASICALLY THE  
3 THRUST?

4 A RIGHT.

5 Q IN EXHIBIT 11, IS THAT WHAT WITNESS LEE IS SAYING?

6 A NOT AT ALL. HE IS SAYING SOMETHING QUITE DIFFERENT.

7 Q LET'S TAKE THE ONE ON PAGE 94 OF EXHIBIT 11. WHAT IS  
8 WITNESS LEE SAYING THERE?

9 A WITNESS LEE HAS IN THE SEVEN OR EIGHT PAGES PRECEDING  
10 THIS BEEN DOING A COMMENTARY ON FIRST CORINTHIANS, 12, 13 AND  
11 14 IN WHICH --

12 Q THOSE ARE BOOKS OF THE BIBLE.

13 A AND SPECIFIC CHAPTERS OF THE BOOKS. THE MATERIAL IN  
14 THOSE CHAPTERS CONCERNS THE GIFTS OF THE SPIRIT AND IN THOSE  
15 CHAPTERS PAUL IS TALKING ABOUT THE MOST IMPORTANT GIFT OF  
16 THE SPIRIT, WHICH IS PROPHECY, AND WHAT HE CALLS THE MORE  
17 EXCELLENT WAY, WHICH IS LOVE, AND WHAT LEE HAS BEEN DOING  
18 IS EXPLICATING THOSE TWO IDEAS, WHAT IS THE MAJOR GIFT OF  
19 THE SPIRIT AND WHAT IS LOVE, AND THEN HE SUMS UP HIS -- THAT  
20 HE'S DISCUSSED OF PAUL AND HE SAYS "IS THIS MY TEACHING?"

21 THE "THIS" THAT IS, IS PAUL'S TEACHING ON THE GIFT OF  
22 THE SPIRIT AND LOVE WITNESS LEE'S TEACHING? NO. PAUL'S  
23 TEACHING IS THE REVELATION OF GOD IN THE BIBLE. IT WAS  
24 BURIED, IT WAS COVERED FOR CENTURIES BUT BY HIS MERCY IT HAS  
25 BEEN DISCOVERED.

26 THAT IS WHAT HE IS SAYING. HE IS NOT TALKING ABOUT  
27 HIMSELF AT ALL. HE IS TALKING ABOUT PAUL'S DISCUSSION OF THE  
28 GIFTS OF THE SPIRIT AND LOVE.

1 Q THIS IS JUST EXACTLY THE OPPOSITE OF WHAT MR. DUDDY IS  
2 PORTRAYING, IS THAT CORRECT?

3 A RIGHT. HE IS PUTTING FORTH THE BIBLE. HE IS HOLDING  
4 UP A BIBLE AND SAYING "BELIEVE THE BIBLE."

5 Q NOW LET'S GO TO THE OTHER QUOTE, THAT IS ON PAGE 97.

6 THE COURT: I AM HAVING A LITTLE DIFFICULTY HERE.  
7 DOCTOR, MAYBE I AM NOT READING ALL OF WHAT DUDDY SAYS HERE,  
8 BUT AS I UNDERSTAND IT, HE IS SIMPLY QUOTING IN CONTEXT FROM  
9 WHAT IS IN THIS BOOK THAT IS WRITTEN BY WITNESS LEE. DOES  
10 HE SOMEPLACE BEFORE THAT -- IT IS QUOTED AS SAYING "IS THIS  
11 MY TEACHING," AND IT SAYS NO. HOW DO YOU INTERPRET FROM  
12 WHAT APPEARS HERE IN DUDDY'S BOOK THAT WHAT HE IS SAYING IS  
13 THAT THIS IS WHAT LEE IS SAYING?

14 THE WITNESS: IN DUDDY'S BOOK HE'S JUST BEEN  
15 SAYING THE LOCAL CHURCH TEACHES THAT WITNESS LEE IS AN  
16 ORACLE OF GOD AND THAT WITNESS LEE AGREES WITH THAT.

17 THE COURT: WHAT YOU ARE SAYING IS THIS CONTEXT  
18 DOESN'T MAKE REFERENCE TO CHAPTERS 12, 13 AND 14 OF  
19 CORINTHIANS BUT RATHER WITNESS LEE'S TEACHINGS?

20 THE WITNESS: RIGHT. WHAT IT IS MADE TO SAY  
21 HERE IS THAT IS IT MERELY WITNESS LEE'S TEACHING THAT HE IS AN  
22 ORACLE OF GOD? NO, IT IS THE BIBLICAL TEACHING THAT WITNESS  
23 LEE IS AN ORACLE OF GOD. THAT IS WHAT THE TEXT SAYS.

24 Q (BY MR. MORGAN) IN EFFECT HE IS SAYING THAT WITNESS  
25 LEE IS SAYING THAT THE BIBLE SAYS "I AM THE ORACLE OF GOD."

26 A RIGHT.

27 Q AND THAT IS NOT AT ALL WHAT WITNESS LEE WAS SAYING,  
28 IS THAT RIGHT?

1 A RIGHT.

2 Q NOW LET'S GO TO THE QUOTE ON PAGE 97. WHAT IS WITNESS  
3 LEE SAYING THERE?

4 A OKAY. HE IS MAKING A -- WITNESS LEE IS COMMENTING  
5 UPON A VERSE IN WHICH PAUL SAYS "AND UNTO THE MARRIED I  
6 COMMAND YET NOT I BUT THE LORD." IN OTHER WORDS, THAT IS  
7 PAUL'S WORDS.

8 AND HE DISCUSSES THAT AND THEN HE CLOSES HIS SENTENCE  
9 BY -- CLOSES THE PARAGRAPH BY PARAPHRASING PAUL'S WORDS,  
10 "WHEN I COMMAND IN MY SPIRIT THE LORD COMMANDS WITH ME,  
11 FOR I AM ONE WITH THE LORD."

12 NOW IN DUDDY'S TEXT IT IS MADE TO APPEAR THAT THE  
13 "I" IN THAT SENTENCE IS WITNESS LEE. IT IS VERY OBVIOUS  
14 FROM READING THE TEXT OF THIS THAT THE "I" IS PAUL AND BY  
15 IMPLICATION EACH AND EVERY BELIEVER WHO CAN BE LIKE PAUL.  
16 BUT IT IS PRIMARILY PAUL.

17 SO IT IS PAUL WHO IS SAYING "WHEN I COMMAND IN MY  
18 SPIRIT THE LORD COMMANDS WITH ME," NOT WITNESS LEE. AND IT  
19 IS MADE TO APPEAR IN THE TEXT THAT IT IS WITNESS LEE WHO IS  
20 CLAIMING AUTHORITY FOR HIMSELF WHEN HE IS IN FACT HOLDING  
21 UP PAUL'S AUTHORITY.

22 THE COURT: DO YOU FEEL, DOCTOR, THAT SOMEONE  
23 OF MR. DUDDY'S BACKGROUND AND HIS STUDIES AND HIS EXPERIENCES,  
24 THAT HE COULD HAVE MADE THIS AS JUST A MISTAKE OR AN ERROR  
25 OR DO YOU FEEL THAT THIS IS A FORM OF INTENTIONAL MIS-  
26 REPRESENTATION?

27 THE WITNESS: THAT WOULD -- THAT IS A QUESTION --

28 THE COURT: IS THIS A REASONABLE MISREADING OF

1 THIS?

2 THE WITNESS: THAT IS THE QUESTION I STARTED OUT  
3 WITH AND HAVE PONDERED THROUGH THIS WHOLE THING. THE  
4 CONCLUSION I HAVE COME TO IS I DON'T SEE HOW HE COULD HAVE  
5 MISREAD IT. I QUOTE HONESTLY DON'T SEE HOW -- HERE IS A MAN,  
6 HE'S GOT A SEMINARY DEGREE. HE CONCENTRATED IN THEOLOGY IN  
7 SEMINARY.

8 WHILE HE DOESN'T HAVE A DOCTORATE HE CERTAINLY IS NOT  
9 AN UNINTELLIGENT MAN. THAT WAS SHOWN THROUGHOUT HIS  
10 DEPOSITION. I DON'T SEE HOW HE COULD HAVE DONE IT.

11 THE COURT: IN OTHER WORDS, THE WAY THESE HAVE  
12 BEEN CHANGED IS NOT JUST A CARELESS OR QUICK READING OF IT  
13 BUT IT WOULD BE SOMETHING WAY BEYOND THAT?

14 THE WITNESS: I THOUGHT AT FIRST I WAS WILLING  
15 TO GRANT HIM THAT POINT BUT AFTER READING HIS DEPOSITION  
16 AND HIS POINTING OUT THAT HE HAD GONE OVER THIS MATERIAL IN  
17 SOME DEPTH, HE DIDN'T JUST DO A QUICK READING OF IT, AND  
18 THEN GOING BACK OVER THE BOOK AGAIN HE COULD NOT HAVE  
19 CONSTRUCTED THE BOOK OFF OF JUST A QUICK READING.

20 THE BOOK IS TOO SOPHISTICATED FOR THAT. AND THIS KIND  
21 OF THING HAPPENS TOO MANY TIMES.

22 Q (BY MR. MORGAN) IN THIS BOOK?

23 A IN DUDDY'S BOOK. THAT IS THE REAL PROBLEM.

24 Q THEN AS ROUGHLY AS YOU LIKE TO SAY IT, MUST YOU SAY  
25 THAT IT APPEARS TO BE DELIBERATE?

26 A YES.

27 Q WHAT IS THE IMPACT OF THIS KIND OF A CHARGE AGAINST  
28 WITNESS LEE IN THE EYES OF PEOPLE THAT WILL READ THIS BOOK?