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CIRCUIT COURT OF OREGON
FOR LANE COUNTY

BY

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LANE

HARVEST HOUSE PUBLISHERS, INC. an
Oregon corporation; DR. JOHN
ANKERBERG, an individual; JOHN
WELDON, an individual; and DOES 1-10,
individuals,

Plaintiffs,

v.

THE CHURCH IN FULLERTON
CORPORATION, a California corporation,
a.k.a. The Living Stream Ministry, The Local
Churches, and The Co-Workers of Witness
Lee; and ROES 1-100, individuals.

Defendants.

Case No. 12-01-24034

AMENDED COMPLAINT -
DECLARATORY JUDGMENT

Pursuant to the Uniform Declaratory Judgment Act at Or. Rev. Stat. 28.010 *et seq.*,
Plaintiffs Harvest House Publishers Inc., Dr. John Ankerberg, John Weldon, and Does 1-10
allege:

1.

Plaintiff Harvest House Publishers Inc. (hereinafter Harvest House) is a publisher of
Christian books and literature and is a corporation organized under the laws of the state of
Oregon. Harvest House has its principal place of business in Eugene, Oregon.

2.

1
2 Plaintiff Dr. John Ankerberg is one of two authors of *The Encyclopedia of Cults and New*
3 *Religions* and resides in the state of Tennessee.

4
5 3.

6 Plaintiff John Weldon is one of two authors of *The Encyclopedia of Cults and New*
7 *Religions* and resides in the state of Hawaii.

8
9 4.

10 Plaintiffs Does 1-10 are individuals whose identities are currently unknown and may be
11 sued by Defendants for alleged defamation with regard to statements appearing in *The*
12 *Encyclopedia of Cults and New Religions*.

13
14 5.

15 Defendant The Church in Fullerton Corporation a.k.a. The Living Stream Ministry, The
16 Local Churches, The Co-Workers of Witness Lee, and The Co-Workers of Watchman Nee
17 (collectively referred to hereinafter as "The Church"), is a corporation organized under the laws
18 of the state of California and having its principal place of business in the state of California.

19
20 6.

21 Defendants Roes 1-100 are individuals whose identities are currently unknown and who
22 may sue Plaintiffs for alleged defamation with regard to statements appearing in *The*
23 *Encyclopedia of Cults and New Religions*.

24
25 7.

26
FIRST CLAIM FOR RELIEF

DECLARATORY JUDGMENT

Plaintiffs reallege statements made in paragraphs 1-6 above.

8.

1
2 On or about December of 1999, Plaintiff Harvest House published a work authored by
3 Dr. John Ankerberg and John Weldon entitled *The Encyclopedia of Cults and New Religions*,
4 (hereinafter the "Work") which gives synopses of non-mainstream religious and cult
5 organizations. The Work contains a chapter on The Local Church.

6
7 9.

8 On January 11, 2001, Harvest House received a collective letter from Church affiliates
9 which expressed concern with the Local Church being characterized as a "dangerous cult" and "a
10 significant threat to society" in the Work. Although The Church expressed concern with the
11 Local Churches being included in "a book of cults" it made no specific objections to the
12 characterizations of The Local Church or other Church affiliates as they appeared in the Work.

13 10.

14 The Church stated in its January 11 letter that in a manner of "direct fellowship," a face-
15 to-face meeting at Harvest House's place of business would be a preferred method of explaining
16 "certain facts" that would allegedly be "crucial to" Harvest House's evaluation of its position
17 with regard to the practices of The Local Church.

18
19 11.

20 On January 31, 2001, The Church sent a second letter to Dr. John Ankerberg, one of the authors
21 of the Work, expressing a similar distaste for the alleged mischaracterization of The Local Church.

22 12.

23 Before agreeing to the proffered "face-to-face" meeting, Plaintiffs' counsel offered The
24 Church via written correspondence a chance to explain its objections to the Work and to provide
25 supporting documentation for its objections.
26

13.

1 The Church responded to Plaintiffs Harvest House, Ankerberg, and Weldon that it was
2 disappointed that Plaintiffs retained counsel in the matter and further demanded a personal
3 meeting in the form of a "Christian fellowship" without the presence of lawyers. The Church
4 stated that it was giving Plaintiffs one last chance to meet "in a Christian way."
5

6 14.

7 On or about June 4, 2001, Harvest House, Ankerberg, and Weldon wrote a collective
8 letter to The Church expressing their regret that The Church interpreted the letter of Plaintiffs'
9 counsel as antagonistic. Plaintiffs further requested written explanations of The Church's
10 objections to the material about The Local Church appearing in the Work. Plaintiffs explained
11 that the synopses relating to Defendants' organizations were based on accurate material and
12 thorough research.
13

14 15.

15 On November 20, 2001, The Church wrote a letter to Harvest House stating that the
16 refusal to meet in person with Church affiliates only demonstrated that Harvest House did not
17 care what harm it inflicted and that Harvest House had acted with malice. In addition, The
18 Church listed the following reasons for believing the Work to be defamatory:
19

20 a. The title of the Work would lead a reasonable reader to the conclusion that all of
21 the organizations profiled are cults;

22 b. Each and every "disreputable practice" that the Work attributes to Church
23 affiliates is absolutely false with respect to The Local Church; the Work misrepresents the
24 beliefs, practices, purpose, and founders of The Local Church, thereby "forcing" it into a mold of
25 what a cult is;
26

1 c. The Work imputes to The Church and its affiliates moral and religious beliefs that
2 it does not hold; and

3 d. Passages from the Work falsely suggest that leaders of the Local Church practice
4 "shamanism," speak through demons, and encourage believers to communicate with devils.

5 16.

6 In short, it is The Church's position that neither it nor its affiliates are cults and possess
7 none of the attributes given them in the Work.

8 17.

9 It is Plaintiffs' position that careful and thorough research was conducted on their part
10 and information presented on Defendants in the Work was based on fact and truthful
11 investigation.

12 18.

13 An actual controversy has arisen and now exists between the Plaintiffs and Defendants
14 relating to whether Plaintiffs have defamed Defendants. Plaintiffs desire a declaration of rights
15 based on the information presented herein.

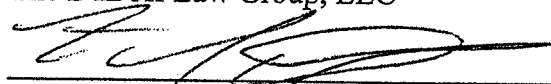
16 WHEREFORE, Plaintiffs pray for a declaratory judgment against Defendants as follows:

17 A. That this Court declare that Plaintiffs have not defamed Defendants with regard to
18 material they published on the Defendants in the Work; and

19 B. For such other and further relief as the Court deems just and proper.

20 DATED: December 31, 2001

21 The DuBoff Law Group, LLC

22 

23 Robert S. Dorband, OSB 97250

24 Abby R. Michels, OSB 01352

25 Of Attorneys for Plaintiff