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1 lawsuit. The number -- I'm done.

2 MR. WILLIAMS: We don't have to stop, we
3 can just pause and go off the written record.

4 (Discussion held off the record.)

5 MR. WILLIAMS: We can go back on now.

6 Q. Mr. Towle, I'm going to hand you a copy of
7 the Encyclopedia of Cults and New Religions, the
8 book that is at issue in this case, and what I want
9 to ask you, and if you would take time to look at
10 it, if you need to, but looking just at the material
11 on page 211 and 212 of the Encyclopedia of Cults and
12 New Religions. Tell me if there is anything within
13 those two pages which The Local Church, the
14 unincorporated association, contends to be factually
15 inaccurate?

16 A. Let me preface my comments by saying that
17 before the lawsuit was filed, months before, The
18 Local Church did submit to Harvest House and
19 Ankerberg and Weldon a detailed analysis of this
20 chapter pointing out everything that we claim was
21 wrong with it, so I'm not saying sitting here today
22 I can remember every single thing, but you have it
23 in writing.

24 Q. What I am asking you to do is to tell me
25 the position of the unincorporated association

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1 today?

2 A. If you want me to take the time, I'll do
3 it.

4 Q. Yes, sir.

5 A. Starting at "Info At a Glance, Name: The
6 Local Church," then; "Living Stream Ministry." The
7 name of The Local Church is not Living Stream
8 Ministry. That is a publisher. Then "Purpose: To
9 build God a body." That's not what we say. We say
10 to build up the body of Christ. This is wrong,
11 wrongly expressed. The founder, that may be okay.
12 "Source of authority: Witness Lee; individual
13 revelations; Watchman Nee"--that's false. Our source
14 of authority is the Bible and the Lord Jesus Christ,
15 and although we look very much to the writings and
16 teachings of these two men, to say they are the
17 source of our authority is not right. "Revealed
18 teaching," false. That's not right. We teach what
19 has been taught by Christians through the ages.

20 I don't think we have anything absolutely
21 new, and certainly we don't claim it was revealed in
22 the sense that Joseph Smith had the Angel Moronai
23 reveal something to him on a mountain. We interpret
24 some passages, but we would not agree with revealed
25 teaching because that would challenge the revealed

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1 authority of the Holy Scripture. That's false.

2 "Claim: To be the one true church that God
3 is satisfied with." That is not right. The one
4 true church that God is satisfied with is the Body
5 of Christ and that includes, will include, does
6 include all real Christians. We feel that our way
7 to express the oneness of that Body is according to
8 the Scripture, but we would not say that we are the
9 only ones that God is satisfied with. Obviously we
10 feel some calling, some leading to the practice that
11 we do, otherwise we wouldn't do it, but we would not
12 say this.

13 "Examples of occult potential," this is
14 just slanderous speculation. This didn't need to be
15 written at all. "Whatever might exist would
16 probably originate in the mystical approach and
17 claims of new revelations. Lee however was not very
18 supportive of supernatural experiences." So what
19 does it mean? It doesn't mean anything, "whatever
20 might exist probably," and then "Witness Lee was not
21 very supportive," but you got the word occult in
22 there, which is the purpose, to tie it in to the
23 front and the back of the book. That shouldn't be
24 in at all.

25 Q. That portion of the answer I'm going to

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1 object to as nonresponsive.

2 Tell me is it false? Would it be correct
3 or incorrect to say that Witness Lee was not very
4 supportive of supernatural experiences?

5 A. That part is right -- well, sorry. It
6 depends on what you mean by supernatural
7 experiences. If it's occult, which is what is
8 suggested by the category, then I would say it is
9 true, he had nothing to do with the occult and is
10 not one bit supportive of anything occult, that is
11 true.

12 Q. Next one says "key literature"?

13 A. "Key literature" should first be the Bible,
14 and they left that out, and then as interpreted
15 through the writings of Watchman Nee and Witness
16 Lee. And we view our part in the whole Christian
17 scene as something not unique but built upon others,
18 and if you read both Watchman Nee and Witness Lee,
19 they will acknowledge freely that they have learned
20 from many others, and that what they're teaching is
21 not unique to them in this.

22 I would point that out if it were me on the
23 surface, perhaps you could say it is the key
24 literature, but it leaves out the Bible. That is a
25 big lacking. We follow the Bible. Witness Lee said

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1 "don't say I follow Witness Lee, say you follow the
2 Bible." "Attitude towards Christianity: Rejecting.
3 (When Lee refers to 'Christians' or even 'religion', he is
4 generally referring to true believers.)" That's not right
5 either. Our attitude towards Christianity, we have
6 some criticism of the abuses and the human things
7 that have been brought in not according to the
8 Bible, and what we consider divisions made in the
9 body of Christ, and so if you said critical, it
10 might be right, but we accept all the brothers, all
11 the born again people in all of Christianity as our
12 brothers, so it gives this a wrong impression. "When
13 Lee refers to 'Christians'"--I don't know what that
14 means "or even 'religion' he is generally talking about
15 true believers." If you talk about Christians, they
16 should be true believers.

17 Religion, we do have a theme in our
18 teaching that we want Christ and not just an outward
19 form of religion. That is not unique to us, so you
20 could say religion. Is he referring to true
21 believers in religion, there's many religions and
22 some have true believers, some don't.

23 The next quote is illustrative of that. "If
24 you keep religion," and I'm pretty sure he didn't say
25 Christianity, but that's the author's insertion by

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1 the brackets, "you will lose Christ," so this is what
2 I just said. Our emphasis is on Christ himself and
3 not on outward forms of religion, but by that, we
4 didn't put Christianity in there, they did. We look
5 at these quotes, and I don't have the books here
6 now, and so I can't look at the context, but we
7 explained to you in detail every one of these quotes
8 as out of context and every one of them
9 misrepresented what Brother Lee was really talking
10 about. I don't have the books now and I don't have
11 the memory to remember what it was we wrote, but we
12 explained it all.

13 "Doctrinal summary. Contrary views such as
14 Modalism." False. We have published again and again
15 we don't believe in modalism, but they never listen.
16 We've told Harvest House, we've told others, we
17 don't believe in modalism, they never -- they just
18 disregard our word. "Or historic trinitarianism."

19 "Jesus: God as a man." Jesus, God as a man.
20 It's true Jesus was God as a man. Trinity, "the
21 Trinity," I don't know what they mean by that. "After
22 resurrection He became the Holy Spirit." That is not
23 true. "Or the Lord Spirit," that's true. So it is
24 how they write. One thing wrong, one thing right,
25 and by this way they twist our teaching to make

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1 people feel that we're some kind of cult. If we
2 don't agree with. "Trinity: Orthodox and unorthodox
3 views." This is false. "The Lord Spirit, the
4 Trinity was 'assumed'." No, we never used the word
5 assumed. Never used the word assumed. That's why
6 they put it in quotes. They know it's not our word,
7 so that God could mingle himself with man. This is
8 wrong, and then they quote Affirmation & Critique.
9 "See Affirmation & Critique." I have no idea what
10 they're talking about there. Mr. Pester is editor
11 of Affirmation & Critique. He may know, I don't
12 know.

13 "Salvation: Orthodox and unorthodox views."
14 This is wrong. "Infusing of God's uncreated life."
15 Well, we do teach that God so loved the world that
16 He gave His only begotten Son that whosoever
17 believes in him would not perish but have eternal
18 life, and the Bible says he that has the Son has the
19 life, and so we teach when man is born again, he is
20 regenerated with the life of God. We teach that.

21 "Infusing of God's uncreated life"--it's
22 confusing to me. We do teach that God wants to
23 impart his uncreated life to mankind. That is the
24 Gospel. Then "complex ideas on sanctification," I
25 think that means Mr. Ankerberg and Weldon couldn't

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1 understand what Witness Lee was talking about, so
2 they just put "[complex ideas on sanctification](#)." In
3 one of his books, Mr. Weldon makes it very clear by
4 his notes in the margin, he has no idea what Witness
5 Lee is talking about.

6 When Witness Lee was talking about the
7 subjective experience of the cross of Christ in the
8 life of a believer, to have the self life crucified,
9 John Weldon wrote in the comment "Why is he talking
10 to believers about the cross of Christ, these people
11 are already saved." That shows Mr. Weldon's complete
12 ignorance of the teaching of Witness Lee and the
13 whole teaching of a major section of Christianity
14 that teaches the inward life of Christ, subjective
15 work of the cross for our sanctification. It's
16 ignorance.

17 Four. "[Man: Redeemed is part of God](#)." We
18 don't say that. We say that man will be a part of
19 the new Jerusalem and the new Jerusalem is God
20 dwelling with man. We say recently, if we say
21 anything about becoming God, we quote Athanasius,
22 and we add in life and nature but not in the God-
23 head. So when we emphasize the life of God, we do
24 say God became man to make God man, in quoting
25 Athanasius, but in quoting God as the Godhead, it

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1 is blasphemous.

2 "Sin: orthodox and unorthodox views." I
3 guess according to Mr. Ankerberg and Weldon, some
4 things are orthodox and some things aren't, but
5 again here he picks up something to tie into the
6 front of the book and the back of the book on
7 morality, the whole theme on morality, and it says
8 "Lee's views on morality may tend to depreciate the
9 biblical emphasis." What is that there for? The
10 reason for that is to make people feel that what is
11 in introduction and what is in the conclusion
12 concerning gross immorality may in fact have some
13 basis in Witness Lee's teaching, and it is
14 absolutely false. I never met a more moral, holy
15 man my whole life than Witness Lee.

16 "Satan: Various; personified,
17 personification of sin, God's enemy." I don't have
18 much argument with that. I don't really want to
19 stick up for Satan. "The Fall: A nullifying
20 of the spirit's ability to contact God through
21 Satan's invading the flesh. In a sense, even
22 created man was 'fallen' since he still required
23 redemption." The fall of man refers to the fall of
24 Adam and Eve in the Garden of Eden, and that fall we
25 teach was a disobedience in that God told them not

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1 to eat of the Tree of Knowledge and Good and Evil,
2 so it was a disobedience, a sin.

3 On the other hand, by eating of the tree of
4 knowledge and good and evil, they became wise in a
5 way that was a problem to God and they were put out
6 of the garden, so there is an organic result to the
7 fall, and Roman says that sin dwells in us, in our
8 members, so our teaching is that man's flesh is
9 fallen as a result of the fall, this we teach.

10 "The Second coming: Christ will not
11 return visibly, but as the 'Lord Spirit,' not
12 necessarily as the biblical Jesus Christ," that's false.
13 We teach today our experience of Christ is very much
14 related to the Lord's Spirit, we do teach that, but the
15 return of Christ, we teach he will come first in a
16 secret coming, and then he will come personally and
17 with the saints to receive his own as a man and to
18 set up his kingdom on the earth. This is the proper
19 teaching regarding Christ's coming. It's not what
20 they say here.

21 "Bible: Often viewed as 'the dead letter'
22 (in contrast to 'new revelations') and
23 interpreted figuratively or allegorically." This is
24 another mess. Dead letter. We do sometimes quote
25 Paul when he says in First Corinthians that the

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1 letter kills, but the spirit gives life. Paul was
2 the one that referred to the Scripture, the
3 possibility that the Scriptures could be understood
4 as dead letters. We do sometimes say that, that you
5 can interpret the Bible as only dead letters, but
6 it's not in contrast to new revelations.

7 "Interpreted figuratively or allegorically."

8 We do, following the Brethren and many other Bible
9 teachers, we do do some figurative or allegorical
10 interpretation of the Bible. It as been done since
11 the first Christians. Jesus spoke in allegories, so
12 we do this sometimes. There's nothing wrong with
13 that. That doesn't mean it's our whole teaching.
14 We teach what the Bible says literally, absolutely,
15 what is clearly taught is clearly true, this is
16 some, but anything figuratively or allegorically
17 always has to be subjugated to the clear word of the
18 Lord's teaching in both the Old Testament and the
19 New Testament, so it gives people wrong
20 interpretation.

21 "Heaven and Hell: Redeemed man exists as
22 God's body. Satan and unredeemed man would seem to be
23 annihilated in the lake of fire."

24 This is again a mess. Redeemed man in
25 eternity as I explained, the end of the book of

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1 revelation, you see the New Jerusalem with the new
2 heaven and new earth. It's a holy city, it's the
3 dwelling place of God and man. Also the
4 consummation of the body Christ, so is it God's
5 body? It's a strange term to us. It is their term.
6 Man in eternity will be with God, redeem man, as a
7 part of the new Jerusalem. Then Satan and
8 unredeemed man would seem to be annihilated in the
9 Lake of Fire. The Bible does teach there is a Lake
10 of Fire and it does teach that the devil is going to
11 be there, Satan will end up there.

12 And unredeemed man, I believe that is also
13 the destination, but this is not unique with us.
14 This is standard Christian biblical teaching, so I
15 don't know why they say "would seem to be" is like
16 there's something wrong with it. That's off the top
17 of my head.

18 MR. WILLIAMS: Whatever the next number is.

19 (The document referred to was marked
20 by the reporter as Deposition Exhibit 5 for
21 identification and is attached hereto.)

22 BY MR. WILLIAMS:

23 Q. Mr. Towle, Exhibit 5 is a document which as
24 you see from the Bates stamp legend was produced by
25 The Local Church. Do you know what this is? I mean