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November 20, 2001

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. Robert C. Hawkins
President
Harvest House Publishers
1075 Arrowsmith Street
Eugene, Oregon 97402-9121

Re: ENCYCLOPEDIA OF CULTS AND NEW RELIGIONS by Ankerberg and Weldon

Dear Mr. Hawkins:

We write to you on behalf of the Living Stream Ministry, the Local Churches and the co-workers of Witness Lee. By now you are well aware that we are vehemently opposed to your inclusion of the Local Church in the hit list that Harvest House inaccurately refers to as an "encyclopedia." You also know from past correspondence that our protest is not based on any philosophical or theological differences between us, but upon the inflammatory falsehoods about the Church and its members that appear in Dr. Ankerberg and Dr. Weldon's book. You have been unwilling in the past to discuss these falsehoods at a face-to-face meeting. We urge you once more to meet with us. Your refusal to do so will only demonstrate that you do not care what harm you inflict and have acted with malice.

Notwithstanding our prior protests that the book is false with respect to the Local Church, and in spite of the evidence of falsity that appears on the Internet at www.contendingforthefaith.com, including the court's prior ruling, you have proceeded with a third reprinting and further distribution of the ENCYCLOPEDIA OF CULTS AND NEW RELIGIONS. Because of your disregard for the truth or falsity of your book and for the damage it is causing us, this letter sets forth, in the clearest, simplest terms, the book's most damaging defamatory statements about the Local Church and its members primarily from a legal perspective. However, we feel that it is also important that you understand our responses to the book's misrepresentations about us in more detail, including from a Christian perspective. To that end, we have attached an Appendix that sets forth that detail. We ask that you give the Appendix careful consideration.

We begin with the book's title, ENCYCLOPEDIA OF CULTS AND NEW RELIGIONS ("ECNR"). From this title, a reasonable reader will readily infer that the organizations profiled in the book -- including the Local Church -- are "cults." This inference is particularly reasonable since the book's introduction devotes many pages to a discussion of "cults," never defines the concept of "new religions" and draws no distinction between the two concepts. In fact, linguistics Professor Edward Finegan, of The University of Southern California, in reviewing ECNR stated:

"The clear implication to the reader is that the front matter frames each chapter. An average reader would associate the front matter with every group mentioned....and would believe all of the groups mentioned are immeasurably damaging."

According to Dr. Ankerberg and Dr. Weldon, cults engage in a variety of very bad, unwholesome and morally bankrupt practices. For example, the book alleges that cults subject their members to “physical” and “psychological” “harm”, engage in the “perversion of sexuality,” “restrict” the “independent thought” of their members, and demand “unquestioning obedience” to group “leaders.” The authors further allege that cults engage in “occult practices,” engineer “cover ups of the group’s history” or that of its “leaders,” subject members to “intimidation,” perpetrate “deception and fraud,” engage in fraudulent “fund raising,” and issue deceptive statements concerning “financial costs.” The authors go so far as to suggest that these cults practice “witchcraft” and literally cause “cancer” in their members.

Each and every disreputable practice and trait that the book attributes to the groups targeted in its pages is absolutely false with respect to the Local Church. The Local Church does not merely abstain from such practices but strongly condemns them. By falsely associating the Local Church with these activities, the book maligns the reputation of the Church and its members, while rendering its members unrecognizable as Christians.

The book does not stop there. By including a section on “occult potential” in the chapter on “The Local Church”, inaccurately stating the Church’s teachings, and utilizing misleading editing and out-of-context quotations, it imputes to the Church moral and religious beliefs that it does not hold. For example, it falsely portrays, by taking it out of context, that the quote from Witness Lee, “I am from the third heaven!”, demonstrates that Mr. Lee claimed to be some sort of deity that descended from the “heavens.” Another quote is edited to make it appear that we advocate the blasphemous idea that man becomes God in His God-head to hide the fact that we teach the opposite. These quotes, then, go far beyond mere negligent misrepresentation: there is a false attribution that is every bit as damaging as falsely attributing to the President of the United States the ideologies of Osama Bin Laden or Slobodan Milosevic. In such situations, the reader comes to associate the subject with ideas he detests and thinks less of him because of that false association.

Other passages in the book falsely suggest that Local Church leaders practice “shamanism,” speak through “demons,” and encourage believers to communicate directly with “devils.” Nothing could be farther from the truth. Plainly, these bizarre mischaracterizations of the Church are designed to discredit and marginalize the Local Church. The authors’ destructive intent and outright hostility toward the Local Church comes through clearly in these passages.

What is remarkable about the publication of the false charges and severe mischaracterizations in ECNR concerning the Local Church is that it was done in the face of a court’s ruling in which virtually identical statements about us were found to be libelous.

As you know, on June 26, 1985, the court, after hearing the testimony of several highly respected expert witnesses,¹ found that the Local Church does not fit the definition of a cult as “a centralized authority that manipulates social influences in order to gain control over people for devious ends.” The court also found that the Local Church does not “engage in or advocate deceptive recruiting practices,” that no one “rules the Local Church with an iron rod or with a firm hand,” that the Local Church does not “engage in mental manipulation,” that the leaders do not “control every aspect of church members’ lives,” and that the Local Church does not “isolate members from society.” The court further found no support for the suggestion that the Local Church is “teaching and advocating conduct that would allow or encourage church members to engage in immoral behavior.” The court dismissed as baseless allegations that the Local Church “publicly humiliates members” and that some members were “hospitalized for psychiatric care” as a consequence of

¹ Dr. J. Gordon Melton (Director of the Institute for the Study of American Religion, University of California, Santa Barbara); Fr. John J. Saliba, S.J., University of Detroit (expert in the study of new religions); Reverend Dr. Eugene Van Ness Goetchius (Professor of Theology, Former Chair Philadelphia Episcopal Divinity School); Dr. Rodney Stark (Professor of Sociology, University of Washington); and Dr. H. Newton Malony (Professor of Psychology, Fuller Theological Seminary).

their membership. The court spurned the notion that the "Local Church members are people who conceal." It rejected characterizations that church leaders "use fear tactics or threats of reprisal in order to keep members loyal to the Local Church or to prevent them from leaving." The court also rejected the accusation that the Local Churches "were guilty of financial mismanagement." After making these findings, the court ruled that statements to the contrary, which appeared in Neil Duddy's and Spiritual Counterfeits Project's book The God-Men, were false and defamatory.

It goes without saying that these findings were made years before the publication of ECNR and that Mr. Weldon was aware of them prior to publication. A true copy of the court's ruling is attached to the Appendix hereto as Exhibit A. In the same vein, Harvest House has elected to go forward with a third reprinting of ECNR in the face of our letters protesting the falsity of ECNR, and in utter disregard of the evidence (including the Statement of Decision, the scholars' expert testimony and writings, retractions, and our own writings) of that falsity presented at www.contendingforthefaith.com. As you know, we referred you to that web site in past correspondence and urged you to review its contents. In our view, your decision to ignore accurate information that conflicts with your predetermined views concerning the Local Church is the height of journalistic irresponsibility and the strongest evidence of constitutional malice.

In closing, we reemphasize our desire to meet with you so that we can present our evidence, answer your questions and discuss a solution to this controversy. Nevertheless, you should understand that we will request that a clear and unequivocal retraction of the falsehoods and mischaracterizations identified herein be issued without delay. We will also request your assurance that you will cease distributing copies of THE ENCYCLOPEDIA OF CULTS AND NEW RELIGIONS that discuss the Local Churches and that the book will not be reprinted or distributed again until all false references concerning the Local Churches have been deleted from the text. In addition, we will also seek your written representation that there will be no other publication of the book's statements concerning the Church in any medium at any time.

Please respond to this letter no later than Friday, December 7, 2001. Your failure to do so will give us little alternative but to pursue legal action against you.

Thank you for your consideration.



Andrew Yu
Living Stream Ministry

Richard W. Taylor
For the Local Churches

Daniel E. Towle
For the Co-Workers

Enclosures: Appendix with Exhibits A-E

cc: Barry Langberg, Esq.; John Ankerberg; John Weldon

APPENDIX

- Exhibit A: [Background and Statement of Decision](#)
- Exhibit B: [ECNR's Specific Misrepresentations Concerning the Local Churches](#)
- Exhibit C: [Quotation Abuse and Distortions in "Doctrinal Summary"](#)
- Exhibit D: [ECNR's General Language Mischaracterizing the Local Churches](#)
- Exhibit E: [ECNR's Use of "Cult" as a Defamatory Term](#)
- Exhibit F: [An Open Letter Concerning the Local Church, Witness Lee and The God-Men Controversy](#)
- Exhibit G: [The Experts Speak Concerning Witness Lee and The Local Church](#)

EXHIBIT A to
APPENDIX TO LETTER TO MR. ROBERT C. HAWKINS

Background and Statement of Decision

We ask you to consider in greater detail the history of the previous publications of the same nature that attacked Witness Lee, his ministry and the Local Churches. You are aware of the litigation over two similar books in the 1980's: The Mindbenders and The God-Men. The Mindbenders, referenced at least eight times in ECNR, was published by Thomas Nelson Publishers in 1977, and a second edition was published in 1979. The God-Men was published first by the Spiritual Counterfeits Project (SCP) of Berkeley California in 1977, then in its second edition by a Swiss publisher (1979), and again by Inter-Varsity Press (1981). Earnest appeals for reconsideration were made by Witness Lee and various Local Churches and individuals before each publication, to no avail. Face-to-face discussions were refused, and written responses were ignored. Ultimately, after exhausting all lesser means of resolving the issues raised by those books, we had no choice but to appeal to the courts. We had no other forum to challenge the falsity of those books and no other way to relieve the intense suffering the churches and their members were experiencing as a result of those publications. By repeatedly quoting Witness Lee out of context, those books literally made him say, and accused him of teaching and practicing, the exact opposite of what he actually taught, while also fabricating the impression he was the evil leader of a dangerous cult.

In the case of The God-Men, on June 26, 1985, the Judge overseeing the case, regarding the case against the author and the publisher, entered an unusually long Statement of Decision (Attached hereto) for a default hearing in which he attested to the fact, as needed in a case involving First Amendment rights, that he "was provided with a complete opportunity to question and cross-examine the witnesses in order to ascertain the truth" and concluded that the book was "in all respects, false, defamatory, and unprivileged, and therefore, libelous." (Statement of Decision, p.2.) Moreover, the facts of the case were also established in over 200 volumes of transcribed deposition testimony given under oath by all the parties and some of the expert witnesses. Expert witnesses also testified at the hearing, and their testimony is available at the aforementioned web site. These facts were presented in a hearing that proceeded against the other defendants in the case.

The result of that case was a collective award of \$8.5 million in compensatory damages for libel and \$3.4 million in punitive damages, which expressed the strong feeling of the Judge that "...the statements in the book were made by the defendants knowing they were false or with a reckless disregard of the truth or falsity." (Statement of Decision, p.9.) The Statement of Decision in that case gave a detailed account of the false and libelous statements with the accompanying evidence that supported his ruling. For the sake of brevity, we will refer you to the Statement itself. It is incumbent upon any publisher, including Harvest House, who is effectively publishing the same charges to read and evaluate that Statement of Decision carefully, and make a detailed comparison to a book like ECNR.

Thomas Nelson Publishers decided on April 10, 1983 to retract their sister book, The Mindbenders. Thomas Nelson also issued a public retraction for the book in 18 major newspapers throughout the country in which they publicly apologized and retracted the damaging statements made in the book. It was revealed during the proceedings that the two books, The God-Men and The Mindbenders, had come from one original manuscript. Discovery also revealed that what was printed was not only false, but that it was printed maliciously.

That history brings us to a critical historical link between the defendants of the litigation discussed above and one of the ECNR authors, John Weldon. Mr. Weldon has been an associate of SCP from the time they began to attack Witness Lee in 1977. His name is mentioned in juxtaposition to SCP's announcement of their first "longer work" against Witness Lee. He participated with SCP in cult-fighters conferences in which

Witness Lee was vilified and plans were made to oppose the Local Churches' ministries on college campuses. After suit had been brought against SCP and the principal author of The God-Men (second edition), Neil Duddy, Mr. Weldon corresponded with Mr. Duddy specifically to aid them in their fight against the Local Churches and Witness Lee. Mr. Weldon also sought Mr. Duddy's input regarding a chapter on the Local Church for a book he was writing for Moody Press. We understand that his own attempt to publish against Witness Lee and the Local Churches was frustrated by Moody Press's hesitancy to publish such a work, as the matters concerning the other books were unveiled. Many of these facts have already been verified under oath and with documents produced by SCP and others. From what we understand, Mr. Weldon has worked with SCP and others to damage the ministry of Witness Lee and the Local Churches since approximately 1977. Mr. Weldon still allies himself with SCP, as demonstrated on pages X, XXIV, 422 and 709 (where The God-Men co-author Brooks Alexander is quoted at length) of ECNR. Now, it appears that Mr. Weldon, as part of his ongoing attack on our church, has used Harvest House to again publish falsehoods and incite animosity and ill will against Living Stream Ministry, the Churches, and the memory of Witness Lee.

Due to the links between Mr. Weldon and the authors of a previous book that has been found in court to have maliciously libeled us, it is no surprise that ECNR contains many similarly worded and analogous statements, falsities and innuendoes concerning Witness Lee and the Local Churches that were in the previous book. We leave it to your judgment as to whether a jury would find such misrepresentations in ECNR to be libelous. We, of course, would rather avoid this route. This is why we are writing to you again, in good faith, to see if we can amicably resolve the inclusion of our group in ECNR by having you cease distribution until you remove us from the book and issue a retraction of what ECNR has said about us.

Attached to this Exhibit A is a copy of [the Statement of Decision](#).

EXHIBIT B to
APPENDIX TO LETTER TO MR. ROBERT C. HAWKINS

ECNR's Specific Misrepresentations Concerning the Local Churches

When directly referred to in ECNR, the Local Church is described in terms that make it easy for people to readily identify us (i.e. "The Local Church; Living Stream Ministry," "Witness Lee and Watchman Nee," and "Kerry Robichaux"). At the same time ECNR misrepresents our beliefs and practices in every regard in order to force us into its mold of what a cult is and defame us.

The first point we ask you to consider here is the specific language, including quotes out of context from our materials, characterizing us in the chapter on the Local Churches and elsewhere in the book as a cult. What is said about us is not merely inaccurate. It appears to be intentionally designed to force us into the book's portrayal of a cult and to make us unrecognizable as Christians.

The points in this Exhibit are not an exhaustive treatment, but they demonstrate both ECNR's inaccuracies and its pattern of deliberate misrepresentation concerning both our beliefs and practices. In fact, in every point regarding us ECNR contains misrepresentations of our beliefs. For example: terms are attributed to us that we do not use (e.g. "To build God a body," "the only true church," "The Trinity was 'assumed'," and beliefs are attributed to us that we do not hold (e.g. "occult," "[r]ejecting" "Christians" or "true believers," "[m]odalism," "unorthodox views," "created man...required redemption," "new revelations," "seem to be annihilated," etc.). In some cases, scriptural terms that we use (e.g. "revelation," "Lord Spirit," "dead letter") are placed heretically out of context to make us fit into ECNR's mold of occultic, spiritistic, and horrific cultism. Our morality is even impugned directly, and in every case our faith is unfairly rendered unrecognizable as being Christian.

Our true beliefs and practices are not hard to discover. In ECNR, under the subheading "How to Find Information on Any Religious Group, Philosophy or Subject," the authors commend the reader to: "The Institute for The Study of American Religions – This is headed by Dr. J. Gordon Melton, author of the standard work, The Encyclopedia of American Religions (see ECNR p. XI)." Dr. Melton's Encyclopedia lists the Local Church as belonging to the "Independent Fundamentalist Family," a grouping with a perspective that may not be unlike that espoused at times by Mr. Ankerberg (see Chapter 12 of Dr. Melton's Encyclopedia). On page 524 of the Encyclopedia, Dr. Melton describes our beliefs as follows:

Beliefs: The local churches follow the teachings found in the voluminous writings of Watchman Nee and Witness Lee. A convenient summary is found in a booklet, "*The Beliefs and Practices of the Local Churches*" (reprinted in *The Encyclopedia of American Religions: Creeds*). The statement professes a belief in fundamental Christianity, similar to that of the Plymouth Brethren, and affirms belief in the Trinity, the deity of Christ, the virgin birth of Jesus, the substitutionary atonement, the resurrection of Jesus, His second coming, and the verbal inspiration of the Bible.

The above referenced booklet, The Beliefs and Practices of the Local Churches, can be found at www.contendingforthefaith.com/summary/booklets/beliefs.html and was first published in 1978. Dr. Melton has also published An Open Letter Concerning the Local Church, Witness Lee and The God-Men Controversy, attached as Exhibit F and available at: www.contendingforthefaith.com/summary/open.html).

Dr. Edwin S. Gaustad is Emeritus Professor of history at the University of California, Riverside, with a special interest in the history of American religion. After his research and study of the teachings of Witness Lee and the churches, he wrote:

The beliefs and practices of the Local Church constitute one more variation of emphases and themes familiar in Christian history. From my observation, I conclude that the Local Church stands in the tradition of evangelical Christianity, of the Protestant emphasis on biblical authority, of the great Christian mystics' and pietists' concern for the inner life, of the millennia-old expectation of a New Age, and of born-again, experiential religion. (Exhibit G, The Experts Speak Concerning Witness Lee and The Local Church, p. 200)

You have apparently avoided an investigation and/or disregarded the publicly available writings and the hundreds of books that set forth the actual beliefs and teachings of the Local Churches. For a start, we refer you to The Beliefs and Practices of the Local Churches and the article by Dr. Edwin Gaustad (Emeritus Professor of History at U.C. Riverside), to Dr. Gordon Melton's Encyclopedia of American Religions, and to the volumes of Witness Lee's Life Study -- The Conclusion of the New Testament to help you begin a genuine scholastic investigation of his teachings. They undercut ECNR's misrepresentation of us. The following treatment of ECNR's chapter, "The Local Church," should be sufficient to illustrate not only the inaccuracy of the charges made but that a deliberate attempt appears to have been made to misrepresent the Local Church. The contents of that chapter are addressed in the following exhibits under three sections: Misrepresentations in "Info at a Glance," Quotation Abuse, and Distortions in "Doctrinal Summary."

MISREPRESENTATIONS In "Info at a Glance"

Misrepresentation No. 1: "Name: The Local Church; Living Stream Ministry."

Fact: Living Stream Ministry, Kerry Robichaux, the family of Witness Lee, and all the Local Churches with their members and leadership are identified through this chapter as being associated with the intolerable evils discussed in the Introduction and Doctrinal Appendix. This itself is a gross misrepresentation of the "The Local Church."

Misrepresentation No. 2: "Purpose: To build God a body."

Fact: The authors mischaracterize the purpose of the Local Churches by creating a non-biblical term, which is not used by us and gives rise to strange connotations. We stress that the goal of the New Testament ministry is "unto the building up the Body of Christ," as revealed in Ephesians 4:12, and that it "causes the growth of the Body unto the building up of itself in love," as revealed in verse 16 of the same chapter. The Body of Christ is composed of every blood-washed, Spirit-regenerated believer. Our wording for our purpose, which we adopt from the New Testament, should not sound strange to Christians including yourself. In The Beliefs and Practices of the Local Churches, we identify that "Our Mission" is:

1. To preach the gospel of grace and of the kingdom to sinners that they may be saved.
2. To minister the life supply to believers that they may grow in Christ.
3. To establish the church in each city that the believers may become a local corporate expression of Christ in practicality.
4. To release the living and rich word of God from the Holy Scriptures that the believers may be nourished to grow and mature.
5. To build up the Body of Christ so that the Bride may be prepared for the coming back of Christ as the Bridegroom.

Notice that the term used in point 5 above is the scriptural thought "to build up the Body of Christ" and not the strange sounding "To build God a body."

Misrepresentation No. 3: “Founder: Witness Lee (The Local Church claim Watchman Nee as their founder).”

Fact: In the context of the rest of ECNR, this section implies that whatever “founders” named are shamanists. This misrepresentation is later strengthened by two quotes taken out of context from *How to Meet*, and by references to “revelations,” “mystical approach” and “new revelation” as those terms are used in ECNR. In addition, the statement that we “claim” Watchman Nee as our “founder” implies both deception and evil as explained in the “Introduction” of ECNR. It is also an obvious attempt to disassociate us from Watchman Nee, a popular Christian writer published by Living Stream Ministry.

Watchman Nee, Witness Lee, and other ministers of God’s Word among us, emphasize in their ministry that their teaching relies on and “stands on the shoulders” of the Christian teachers who went before them. They did not “found” a “new religion” based on extra-biblical “revelations” as portrayed in ECNR.

Misrepresentation No. 4: “Source of authority: Witness Lee; individual revelations; Watchman Nee.”

Fact: The “Source of Authority” section does not mention the Bible, which is our unique source of authority for teaching, nor the God of the Bible who is the only true source of authority. Neither does it mention the many other Christian writers (in addition to Witness Lee and Watchman Nee) whom we appreciate and whose books we recommend. This misrepresentation, that we put the source of authority in one or two individuals, is used to imply that we are a dangerous authoritarian cult. It also shows that the authors do not understand the relationship the more prominent Bible teachers among us have to the churches and their members. The claim that “individual revelations” are given authority is also not accurate; we look to the Bible as the sole authority of any and all teachings (see below).

Misrepresentation No. 5: “Revealed teachings: Yes.”

Fact: We do not hold any teachings except those revealed in the Bible. In the context of ECNR, however, “revealed teachings” means receiving evil spirits’ influences and revelations. We believe in the Bible and its revelation of an incarnated, crucified, resurrected, ascended and enthroned Savior, the Lord Jesus Christ. Under the topic “Our Belief,” The Beliefs and Practices of the Local Churches states: “We believe that the Holy Bible is the complete divine revelation verbally inspired by the Holy Spirit.” Then, under “Concerning the Christian Life” a further explanation is provided:

“The Word of God: The Bible occupies a very important place in our Christian life. All those in the local churches are encouraged to read the Word in a regular way, even to read it through once a year. We read the Word, we study the Word, and we take the Word by prayer as spiritual food. All teachings, inspirations, and guidance which claim the Holy Spirit as their source must be checked by God’s revelation in His Word.”

The Local Churches’ and Witness Lee’s reliance on the Bible as the source of all teaching and revelation is covered in some detail by Dr. Melton in Exhibit F.

Misrepresentation No. 6: “Claim: To be the only true church that God is satisfied with.”

Fact: We do not make this claim. In saying we are the church in a city, we are saying that we, including – not excluding – all the believers in that city, regardless of their conviction or practice regarding the church, are members of the one Body of Christ and that we are standing on that basis to meet as that church. Our meetings are open to and for all believers: we receive believers on the basis of God’s receiving of them (Romans 14). We do not forbid or exclude the participation of any believers, regardless of their doctrinal preferences (except for teachings or practices that are sinful, idolatrous or divisive). While we do not believe denominationalism is a scriptural practice, neither do we teach that to simply meet according to the scriptural principle of one church in one city “satisfie[s] God.” We also recognize that other Christian groups may be more faithful to the Lord, more spiritual, and/or more scriptural in some aspects than we are. The

above charge is used to imply that we, similar to the Mormons and Jehovah Witnesses, think we are the only real Christians. This, in fact, is not the case. For a more thorough explanation of our stand regarding the church and all believers, see the many publications on this subject by Watchman Nee and Witness Lee, including The Speciality, Generality, and Practicality of the Church Life by Witness Lee.

Misrepresentation No. 7: “Examples of occult potential: Whatever might exist would probably originate in the mystical approach and claims of new revelation. Lee, however, was not very supportive of supernatural experiences.”

Fact: The words “Whatever might” lead us to assume the authors have no evidence of the occult in the Local Churches, and to wonder: if the authors do not know of such an evil why would they speculate? This is a backhanded method to smear our name with evil associations without requiring the authors to provide supporting evidence. The words “not very supportive” carry the implication Mr. Lee was “somewhat supportive” which was not true. The authors’ attempt to link us to evil spirits by using the terms: “individual revelations,” “Revealed teachings: Yes,” “Examples of occult potential: Whatever might exist would probably originate in the mystical approach and claims of new revelation,” “new revelations,” and the quotes from page 31 and 112-113 of How to Meet. ECNR further states on page 708 that “All the groups discussed in this volume accept occult powers.” The damage from creating such associations is seen on page 714: “From this reality flows a number of other concerns: idolatry, spiritual deception, the possibility of possession, psychological and physical harm and the immoral, ethically consequential teachings that inevitably accompany demonic involvement or revelations.”

These associations are also very damaging to us since no fundamental or evangelical Christian wants to be associated with anyone or any group where the occult “might exist.” We do not teach or practice anything of the occult, but teach strongly that the Lord Jesus, as a man, defeated Satan on the cross and that by His precious blood shed on the cross He purchased us to God. We reject all occult practices, powers, teachings, revelations and associations.

Misrepresentation No. 8: “Key literature: The books of Witness Lee and Watchman Nee.”

Fact: While we highly regard the scriptural ministry of these two men, this statement puts us in a false light. It is false because it obscures the fact that the Bible is primary in all our teaching and is the “key” writing used in our churches. The statement is also false because it fails to point out that the books and messages of many other Bible teachers are also highly valued by our church members.

Misrepresentation No. 9: “Attitude toward Christianity: Rejecting. (When Lee refers to “Christians” or even “religion,” he is generally referring to true believers.)”

Fact: This statement relies on a gross misrepresentation of what we mean by “Christianity,” and is diametrically opposed to our true belief. In certain discussions, we (as do many others) use the term “Christianity” to refer to unscriptural practices and organizational systems inherited from Judaism or Catholicism and yet practiced at times in Protestant churches. However, we never use “Christianity” to refer to and reject any Christian believers (regardless of their church practice). ECNR misrepresents us by changing the meaning of “Christianity” to mean “Christians” and “true believers,” rather than limiting our critique to the unscriptural man-made systems.

This misrepresentation is compounded by the insertion of “[Christianity]” in the quote taken from page 157 of Christ vs. Religion and addressed in some detail in Exhibit C “Quotation Abuse....” Interestingly, on page XXX and other places in ECNR, the authors demonstrate and document their own low opinion of “Christianity” as it is widely practiced today. Following are some selections from The Beliefs and Practices of the Local Churches to further clarify our attitude toward Christianity and toward the believers:

- What is your attitude toward the historic, institutional Christian church?

We stand outside of and apart from historical, organized, institutionalized Christianity because we regard it as a system filled with unscriptural teachings and practices. For the sake of the genuine recovery of the church life revealed in the Bible, we meet together in the Lord's name on the ground of genuine oneness in the locality.

- What is your attitude toward other Christians?

We would like to make it emphatically clear that we neither believe nor teach that one must be in a local church in order to be a genuine Christian. We recognize that in the Roman Catholic Church, in the denominations, and in the independent groups there are many genuine blood-washed, Spirit-regenerated believers in Christ, and we receive them as our brothers and sisters in the Lord. All who have saving faith in the Lord Jesus are welcome to all our meetings, especially the Lord's table, where we testify of the oneness of the Body of Christ. Although we must, for conscience' sake, stand apart from organized religion, we do not stand apart from our brothers and sisters in Christ. In faithfulness to the Lord, we stand on the unique ground of the church for the sake of the Lord's testimony. But we do not take this stand with a narrow, exclusive, or sectarian spirit. On the contrary, we take our stand on behalf of the whole Body; we receive all believers even as the Lord has received us.

The rest of the material in the ECNR chapter on "The Local Church" is addressed in Exhibit C.

EXHIBIT C to
APPENDIX TO LETTER TO MR. ROBERT C. HAWKINS

Quotation Abuse and Distortions in “Doctrinal Summary”

The next section of “Info at a Glance” consists of four quotations, three from Witness Lee and one from Kerry Robichaux. Each quote was taken out of context by the authors of ECNR which results in a defamatory portrayal of the teachings and practices of the Local Church. A fair evaluation of the authors’ treatment of our quotes alone is sufficient basis for you to delete the material regarding us from ECNR. ECNR wrenches four quotes out of their clear context. (1) Witness Lee’s words concerning the practice of circumcision are miscast into a rejection of “Christians” and “true believers.” (2) Kerry Robichaux’s careful distinction between God’s eternal self-existence in His Godhead and His believers’ participation in God through sanctification is eliminated by selectively chopping up a paragraph so that instead, Robichaux appears to say that man becomes God in His Godhead and Trinity, a blasphemy. (3) A sentence of Witness Lee’s exhortation to a multiracial audience that they should practice their identification with Christ in His resurrection as Christ’s brothers is misused as evidence of shamanism and demonism. (4) Witness Lee’s encouraging word to overcome shyness and learn to speak for Christ by practicing and speaking their commitment to Christ, even to angels, is in the context of ECNR made to serve as an example of spiritism by omission of critical language.

This is not the first time this method has been used to defame us, so it is instructive to recall what Dr. Melton said in An Open Letter Concerning the Local Church, Witness Lee and The God-Men Controversy:

Part of my study of the Local Church involved the reading of most of the published writings of Witness Lee and the lengthy depositions of Neil T. Duddy and Brooks Alexander (of SCP). The experience proved among the more painful of my Christian life. As I began to check the quotes of Witness Lee used in Duddy’s book, I found that The God-men had consistently taken sentences from Lee’s writings and, by placing them in a foreign context, made them to say just the opposite of what Lee intended. This was done while ignoring the plain teachings and affirmations concerning the great truths of the Christian faith found throughout Lee’s writings (pp. 1-2).

Much of the rest of Dr. Melton’s book deals with specific instances where SCP used quotes from Witness Lee’s ministry out of context in order to make false accusations. It is disappointing to find the same methods of misrepresentation, exposed in detail by Dr. Melton in his book, used again in ECNR to make the same misrepresentations of our beliefs and practices in order to deceive the public.

It is worth pointing out that the authors are not ignorant of what they are doing: “Bible verses must be interpreted both in their immediate and larger context. This may require some understanding of the author, and the general historical context, such as whether the book is pre-exilic or post-exilic. Just as no one interprets a single sentence in a magazine article by itself, but in the context of the entire article, this must be true with the Bible.” (ECNR pages 671-672) In the following examples, you will see how the authors, by design, violate their own standard for interpreting writings by quoting Witness Lee and Kerry Robichaux out of context to cast them into ECNR’s cultic mold.

ECNR Quote #1: “‘If you keep religion [Christianity], you will lose Christ.’ (Witness Lee, *Christ vs. Religion*, p. 157.)”

The first quote is a half sentence presented as a complete sentence, taken out of context, and twisted by a foreign insertion to be given a different meaning. The quote is not an example of Witness Lee criticizing “Christianity,” as the authors allege, but of Witness Lee paraphrasing the Apostle Paul’s criticism of the

Jewish practice of circumcision being brought into the early churches. While we recommend the context of the entire book, the following is the quote (underlined) for your reconsideration, in context:

Paul tells us in his letter to the Galatians that if we attempt to keep religion, we will lose Christ and Christ will become of no effect to us. "Behold, I Paul say unto you, that, if ye receive circumcision, Christ will profit you nothing. Ye are severed from Christ, ye who would be justified by the law; ye are fallen away from grace" (Gal. 5:2, 4). If you keep religion, you will lose Christ; and if you keep Christ, you will certainly lose religion. Christ is versus religion; Christ never goes along with religion.

Then Paul tells us in Galatians 6 that it is not a matter of circumcision or uncircumcision, it is not a matter of being a Jew or a Greek; it is a matter of being a new creature in Christ (6:15). He says, "If we live by the Spirit, by the Spirit let us also walk" (5:25). This is all: we just need to walk in the Spirit; we just need to be a new creature, without anything religious.

This quote uses the term "religion" with reference to a Jewish religious practice, i.e. circumcision, and not, as alleged directly before under "Attitude toward Christianity," with reference to "true believers." It is hard to imagine a more flagrant misquotation. One may wonder why it was done if not to deliberately mischaracterize Witness Lee as being anti-Christian. The quoted passage is not a criticism of any proper New Testament teaching or practice, as the authors allege by inserting "[Christianity]" among Witness Lee's words, thus changing his original meaning significantly.

ECNR Quote #2: "Our own distinctive understanding of God's economy rests upon the simple premise that God operates in time upon His elect to make them the same as He is in life, nature, and expression....His elect become God by their union and communion with Him and by their continual dependence on Him and on what He is in Himself." (Kerry S. Robichaux, "The Divine Trinity in the Divine Economy," *Affirmation & Critique*, April 1999, p. 37.)

The authors' attempt to force Mr. Robichaux to sound "new age" is exposed when the material the authors left out of this quote through their use of the ellipsis (see bold text below) is examined. Again, a half-sentence quote was employed to fashion the misrepresentation. As in "ECNR Quote #1" above, the reader has no idea only half a sentence is being presented. Although Mr. Robichaux points out that two issues of the periodical, *Affirmation & Critique* (A&C), are devoted to the concept of God's Economy, an examination of the immediate context of the quotation demonstrates the attempt in ECNR to conceal the real import of Mr. Robichaux's statement and turn it into something heretical:

In this and the previous issue of A&C we have presented our understanding of the divine economy, that endeavor of God to fulfill His heart's desire from eternity past (Eph. 1:5, 9). The term *God's economy* (1 Tim. 1:4) can encompass quite a range of understanding, depending on what one's notion is concerning God and His relationship to His people. Our own distinctive understanding of God's economy rests upon the simple premise that God operates in time upon His elect to make them the same as He is in life, nature, and expression. The initiation of this operation is the incarnation, whereby He became what we are in life, nature and expression; and the economy consummates in the New Jerusalem, where God's elect have become what He is in life, nature and expression. This understanding reflects what Athanasius said concerning the incarnation in his well-known aphorism: 'For He was made man that we might be made God' (De incarnatione Verbi 54.3). It is important to note that in this process God's uniqueness in Godhead and Trinity is preserved. At the simplest level, we can say that God is God by virtue of His eternal self-existence, whereas His elect become God by their union and communion with Him and by their continual dependence on Him

and on what He is in Himself. God self-exists as God; His elect are made God because He is God. In this, God is glorified and not, as some may suspect, minified. This distinction between the God who self-exists eternally and the God whom His elect participate in as the goal of His economy was respected by the early church universally through the fifth century and is still maintained by many theologians today.

The authors delete, among other things, Mr. Robichaux's reference to Athanasius of whom the authors wrote favorably on page 685 of ECNR. Some schools of American evangelicalism seem unaware of the body of scriptural truths concerning sanctification (see e.g. the authors' comment on page 212 of ECNR where they find such ideas "complex"). Mr. Robichaux's and other *A&C* articles aim, in part, to remedy that lack of attention to this critical matter. Regardless of the authors' understanding of sanctification, it is apparent that their use of Mr. Robichaux's words is not proper. The use of the ellipsis and the omission of surrounding material change the clear meaning of the original paragraph, making it sound heretical.

We also note that on June 9, 1999, well before the first printing of ECNR was released, this same short quote by Mr. Robichaux, with the same ellipsis, was spread by email in Apologia Report (see pages XI-XII of ECNR). One wonders whether the authors simply borrowed this out of context quote from Apologia Report without reading the original article, or whether they were so bent on damaging our reputation that they took the quote out of context and furnished it to Apologia Report before ECNR could even get to print.

ECNR Quote #3: "If people ask if I come from China, I would tell them, 'No, I come from the third heaven!'" (Witness Lee, *How to Meet*, p. 31.)

Ridiculing a person with his own words is defamatory when the ridicule is accomplished by putting his words in a foreign context. The third quote is painfully out of context. In the context of ECNR, Witness Lee is made to sound like a mad-man or a shamanist guru, with either himself or the evil spirit speaking through him literally claiming to have come to the earth from the third heavens. In fact, Witness Lee is speaking neither in the context of sensationalistic demonic possession nor of his physical place of origin. He is speaking in the context of a congregation of different races and nationalities that need to remember their true identity as "the Lord's brothers" when they come to meet as Christians. The subsection from which Mr. Lee's quote is taken begins: "The second principle of meeting is that we must meet in resurrection as the Lord's brethren." Then Witness Lee considers six verses of scripture, pointing out that now that we have been born again we can meet as believers with a new, heavenly nature. He continues:

But we must realize that we are not His brethren in our old nature; we are His brethren only in resurrection. Whenever we come to the meetings, we must come as the Lord's brothers in resurrection. Therefore, we should never bring anything of the old nature into the meeting. This is more than basic.

In today's Christian meetings one has the sense that those who attend are so much in the old nature and the meetings are still so natural. Let me give you an illustration. For the brothers and sisters in the Far East to shout in the meetings is very difficult. Their nature is always to keep themselves silent and hidden. But on the other hand, the Westerners are altogether too frank. This is another manifestation of the old nature. When we meet as Christians, we must forget our natural disposition. We must meet just as the brothers of Jesus. We are not Chinese and we are not Westerners, we are just the little brothers of Jesus. If people ask if I come from China, I would tell them, "No, I come from the third heaven!" Praise the Lord! A brother once told me that he had never met a Chinese like me. I said he was absolutely right. I am really not a Chinese; I am a brother of the Lord in resurrection. This is how we must meet.

The meaning and context of the above portion are not difficult to discern. Nor is the authors' motive for cutting the sentence in question out of its context and putting it in a book that contends that "all groups discussed in this volume accept occult powers to some degree."

Before going on to the fourth quotation, it is worth pointing out that the two books selected by the authors to take quotes from Witness Lee are in the nature of written records of extemporaneous speaking to church audiences. They were not written as theological textbooks. The meetings in question began with a reading from a list of scriptures on topics related to church practice, were followed by Witness Lee's speaking and then was followed by a time for others in the congregation to also speak on the same general topic. The quotes reflect this somewhat informal atmosphere and the hyperbolic form of some of his speaking. The authors' take unfair advantage of this fact.

ECNR Quote #4: "Brothers, while you are gardening, you have to say something for Christ. You can speak to the birds: "Little bird, I want to tell you that Christ is my life. My life is better than yours. I am so proud of Him." Tell the creatures something about Christ. I am not joking. You will learn how to function. Then, when you come to the meeting, it will be easy for you to say something.... And again I say, we have many opportunities every day to practice. We may not have a human audience, but we can always speak to the beings in the air. When we speak to human beings, there may not be so much need of exercising the spirit, but when we speak to the beings in the air, the mind does not work. To exercise the mind to speak to the angels is useless; we must exercise our spirit to speak to them." (Witness Lee, *How to Meet*, pp. 112-113.)

By the ellipsis in the above quote, the authors again portray spiritism where none exists. The ellipsis eliminates over two paragraphs of material, including Witness Lee's specific suggestion of the rebuke we might speak to the principalities and powers: "Wherever we are, we can tell the angels and the devils, 'Jesus is the Lord; Christ is my life. I am not here for myself, for my job, for my schooling; I am for Christ.'" This language clearly contradicts the authors' misrepresentation of spiritism and shamanism, and was, therefore, eliminated by them from the text.

The chapter in which the quote is found is an encouragement to the attendants to practice and learn to speak for Christ in the meetings of the church. In the context of the several verses in 1 Corinthians 14 which exhort "all" to prophesy, Witness Lee uses Paul's word that he came "in demonstration of spirit and of power" (1 Cor. 2:4) and that Timothy did not have "a spirit of fear" (2 Tim. 1:7), to encourage the believers to be bold enough to speak for Christ in the meetings. Witness Lee says: "Do not say that you are 'chicken.' We all must be 'lions' in prophesying for Christ." Later he encourages: "Do not say that you do not have a loud voice—everyone has a loud voice. [These meetings took place in a rather large auditorium.] I do not believe that when your house is on fire, you will announce quietly to the neighbors that your house is burning down. You will cry, 'Fire! Fire!' Then we will see what kind of voice you have. Do not say anything about eloquence—we do not need eloquence. We can say much for Christ without eloquence." He continues: "I have been much exercised in recent days to find a way whereby all the Lord's children may function one by one in the meetings. To the present day in the local churches, the brothers and sisters are not all functioning among us." This line of thought brings him to a subsection of the chapter titled, "The Need of Practice" from which the above quote is taken out of context in ECNR.

Distortions in Doctrinal Summary

Throughout ECNR's "Doctrinal Summary" and other places where we are identified in the book, our beliefs and practices are misrepresented in every point to force Witness Lee, the Local Churches, and their members into fitting the cultic mold portrayed in the Introduction and Appendix. The consistently inaccurate and misleading representations concerning both our practices and beliefs are designed to ridicule us and make our expression of Christian faith unrecognizable. Most damaging is the statement: "Lee's views on morality may tend to depreciate the biblical emphasis." As you are aware, this repeats and calls to mind SCP's and Mr. Duddy's false and defamatory statements already discredited by items 8 and 9 of the Statement of Decision.

Throughout ECNR, biblical and doctrinal terms which we use are placed out of context in order to portray us as heretical. The authors' baseless speculations attribute to us all sorts of wild, heretical doctrines that

we would never accept (e.g. Modalism; "even created man...required redemption;" "Satan and unredeemed man would seem to be annihilated in the lake of fire;" etc.), *A&C* is quoted as saying the Trinity was "assumed" by God, yet, the authors give no citation but a passing reference to two years of issues of *A&C*. The reason for the lack of citation is simple, no such quote exists. We do not teach that the Trinity was "assumed" by God. Likewise, other so-called quotes are offered without citation.

The authors have strategically attacked us by means of a vague "Summary," without offering any real evidence. Because they have offered no solid bases to refute, not much would be gained by providing a point-by-point denial here. We previously referred you to The Beliefs and Practices of the Local Churches and Witness Lee's Life Study -- The Conclusion of the New Testament to help you begin a genuine scholastic investigation of his teachings. In view of your duty to discover the truth, we also recommend to you the hundreds of other Living Stream Ministry publications that are publicly available to help you place any quote that catches your eye in the proper context of our entire ministry.

EXHIBIT D to
APPENDIX TO LETTER TO MR. ROBERT C. HAWKINS

ECNR's General Language Mischaracterizing the Local Churches

We would like to emphasize the malicious language and vitriolic attitude incited by the authors in their readers toward the Local Churches. To say the least, the authors unequivocally seek to lower the Local Churches in the estimation of the community and to deter third persons from associating or dealing with them -- on false grounds. There is an unmistakable picture painted in the book of the social, psychological, moral and political evil that all of the groups listed in ECNR -- including the Local Churches -- represent. The authors paint a picture of the Local Churches as one of many devious and deceptive groups scheming to enslave unsuspecting people and abuse them for their own purposes. It is a picture of a serious threat to society, especially to any individual so unfortunate as to get involved with them.

It is hard to adequately summarize the ECNR's portrait of the Local Churches. From the Introduction alone we find such factually based grounds for defamation as "mental manipulation and psychological conditioning;" "abuses caused to people;" "totalitarian practices;" "deception and evil;" "psychological dangers;" "a worldwide problem;" "clearly harming us, our children, and our society;" analogies to "rape," "child abuse," "pedophilia," etc.; "demonstrated to be false, harmful and destructive;" "good evidence" of being "detrimental to individuals and to society;" "facts" and "proof" of evils; a multitude of false "claims;" "ethical, psychological and social consequences;" "anti-moral, anti-social and anti-Christian;" "a dark side to them;" "authoritarianism, isolationism, financial exploitation, ... psychological intimidation;" "[t]housands of families ... battered by destructive cults;" "children ... reject their parents;" "threat ... to members, families and society;" "harmfully alter members' perception;" "proven cult dangers;" "havoc created;" "at least 25% will suffer enduring irreversible harm that will affect their ability to function adequately in the emotional, social, family and occupational domains;" "may even be responsible for some forms of cancer;" "destructive authoritarianism and sanction-oriented mentality;" "often subject to psychological, physical ... harm;" "degradation or perversion of sexuality;" "unquestioning obedience to the leader;" "intolerance;" "shamanism and spiritism ... cost a society dearly in terms of moral, social and even economic consequences;" "influenced ... by ... demons;" "leaders are a moral ... embarrassment;" "paranoid;" "use of intimidation or deception;" "often fraud or deception;" "[u]ndue [i]nfluence, [f]raud and [m]isrepresentation;" "secrecy;" "almost universally deceptive, frequently reject common moral concerns and often harm people;" "people are manipulated in different ways for ulterior motives;" "oppose moral convention;" "encourage prostitution;" "sometimes raped women, beaten their disciples, molested children, practiced black magic and witchcraft, engaged in drug smuggling and other criminal activity, including murder;" "deserve the condemnation of us all;" "behavior deserve[s] exposing;" "illegalities;" "perversions;" "the evils that cults do;" "bizarre practices that can harm people;" "brainwashing;" "to illustrate ... that the cults do pose a significant threat to society;" "[i]llegal [a]ctivities;" "wherever cult dynamics operate, they harm people;" "several hundred thousand evangelical Christians that have been harmed by the cults;" "a screen to mask their actions;" "inducing violence, perhaps mass suicide;" and "planning violent outbreaks." Furthermore, the authors insinuate that "what is recorded [in ECNR] is merely the tip of the iceberg" and that there are "many documented things that we could not even mention or discuss" for fear of lawsuit by the groups discussed like the Local Churches. Moreover, the Doctrinal Appendix portrays the discussed groups as conducting even more gruesome horrors, including, "inevitably ... as is increasingly occurring," "human sacrifice."

Such statements have no basis with respect to the teachings and practices of the Local Churches. Applied to the Local Churches, such statements rise to the level of malicious libel.

The following additional quotes demonstrate how ECNR expressly and implicitly tars the Local Churches with the same accusations aimed at all the groups included in the book. Portions below which are in italics are from ECNR when within quotation marks and are ours if outside quotes.

"The groups in this encyclopedia often illustrate larger cultic themes and their implications for our society. For example, collating the 'moral concerns' sections alone would prove to be an enlightening study on the ethical implications of the cults and new religions. Thus most chapters offer a 'larger lesson' than the mere detailing of their theological beliefs, important as that is. These lessons may be used profitably in teaching at all levels. For example:...

"Jehovah's Witnesses also illustrate how the cost of false religion can induce physical or mental illness or even death to oneself or one's children....

"The Unification Church illustrates the folly and consequence of trusting in spiritism, indicating the true nature of the spirits and showing how the origin and worldview of the Unification Church can lead people into a terrible bondage to the spirits." Pages VIII - IX

After listing the moral aberrations of a number of groups (none are specified clearly as a cult or new religion), the authors conclude: "Religion can be good or bad. If this encyclopedia illustrates anything, it is the consequences of bad religion. The lowest common denominator revolving around most of these groups, intentional or not, is a kaleidoscope of deception which, unfortunately, the unsuspecting public (and most in the Christian church) have little cognizance of. Indeed, had we wished to do it, a far darker picture could have been painted." Page IX. Here all the groups are bad religion; the 'lowest common denominator' of the groups in this encyclopedia is deception. The authors impute to these religions even more darkness than what is written in ECNR.

"Unfortunately, as this Volume documents, the cults and new religions are not the good news that they are made out to be by their promoters and advertisers. This can be argued forcefully from a secular perspective and definitively from a Christian perspective. Religious pluralism is a good thing only if the cults and new religions are a good thing. The problem is that they are not. The difficulty is that a counterfeit initially looks so good and feels so good that one rarely suspects something is wrong. Only when the counterfeit is examined and compared with the real thing does the counterfeit become apparent. By then it's often too late." Page XVIII

"And what is the point of being tolerant of everything when many things we tolerate now, including the cults and new religions, are clearly harming us, our children and our society?" Page XIX

"Thank heaven not everyone is convinced the cults are above criticism.⁴" Page XX

[footnote] "4. Consider some recent titles: Miriam Williams, *Heaven's Harlots: My 15 Years as a Sacred Prostitute in the Children of God*; Anton Shupe, *The Darker Side of Virtue: Corruption, Scandal and the Mormon Empire*; Brian Lane, *Killer Cults: Murderous Messiahs & Their Fanatical Followers* (Lane is author of *The Encyclopedia of Serial Killers* and related texts); James J. Boyle, *Killer Cults*; James Randall Noblitt, Pamela Sue Perskin, *Cult & Ritual Abuse: Its History, Anthropology & Recent Discovery*; Marc Breault, Martin King, *Inside the Cult: A Member's Chilling, Exclusive Account of Madness and Depravity in David Koresh's Compound*; Michael Barkun, *Religion and the Racist Right: The Origins of the Christian Identity Movement*; William Henry, *The Keepers of Heaven's Gate: The Millennial Madness, the Religion Behind the Rancho Sante Fe Suicides*; Lawrence J. Gesy, Carol Giambalvo, *Today's Destructive Cults & Religious Movements*; Larry Kaehner, *Cults That Kill*; Michael D. Langone, Linda O. Blood, *Satanism and Occult Related Violence*; George Feuerstein, *Holy Madness: The Shock Tactics and Radical Teachings of Crazy-Wise Adepts, Holy Fools and Rascal Gurus*." Footnote 4 on XXX

The authors condemn tolerance and to praise the virtues of intolerance. They again lump cults and new religions together as they explain: "The reasons for our intolerance of cults and new religions...are more soundly based than our critics would be willing to concede." The next sentence explains, "Facts are facts. Some will be mentioned in this Introduction and many more in the individual chapters." Pages XIX-XX. Here, the authors proclaim the factual nature of their criticisms of cults and new religions. The whole "Introduction" clearly applies to every chapter. Furthermore, their continual generalizations concerning the "groups" in the book, make some of what is written in the specific chapters apply also to the other groups in

their book. This universal application of criticism is strengthened by the next paragraph that defends "the kinds of things described in this encyclopedia" with "good evidence exists in support of such claims."

"During the twentieth century, tens of millions of lives were damaged or ruined by the cults. One wonders, do the "tolerant" care? Anyone who wishes can be tolerant of the kinds of things described in this encyclopedia. That is their right, even if it is coming back to haunt the rest of society. But that does not mean that others have no right to be critical of the beliefs and practices of those whom they think are detrimental to individuals and to society, especially if good evidence exist in support of such claims." Page XX

"This is why it is important to start with Christianity and why Christianity is our standard of measurement to evaluate religious truth claims, especially claims to be Christian or claims to be in harmony with the Bible and Christianity—something all the groups covered in this encyclopedia and hundreds of others assert without blinking." Page XX

"We had little desire to spend seven years compiling and writing this Encyclopedia merely for fun or profit. We wrote it for others to try to help them. We wrote it for people on the outside who are unknowingly misled by the claims of these groups who are thinking of joining. We wrote it for people on the inside who are members of these groups, to help them do some reality testing. We also wrote it for Christians who may unsuspectingly join these groups, or be introduced to them and confused by their claims to be compatible with Christianity." Page XX. *In the section titled, "Use of the Term Cult," all the groups in the book are generalized six times as "these groups," and twice as "the groups in this "Encyclopedia."*

"These groups cannot, in all frankness, be seen as something neutral, biblical, divine or benign. Consciously or not, intentional or not, their agenda is often anti-moral, anti-social and anti-Christian, and they pursue their agenda. Thus, our purpose is: a) to show people what these groups really believe, in spite of claims to the contrary, b) to show that their teachings are not biblical, in spite of claims to the contrary and c) to assist people in understanding what may be expected of them spiritually and otherwise before they join a cult. People have a right to know what may be demanded by these groups. Even outwardly very respectable groups, such as Mormonism, can have a dark side to them." Page XXI

"CHARACTERISTICS OF CULTS

"Thousands of families have been battered by destructive cults. Some parents have had to spend 20 years or more searching for their children, who have been taught to reject their parents as agents of the devil, rather than to honor them as the Bible teaches. Books such as Margaret Singer's *Cults in Our Midst* (1996) show the threat that cults pose to members, families and society generally and how the cults can radically and harmfully alter members' perception. Singer has interviewed thousands of former cult members, so what she says is difficult to ignore. Other studies with thousands of ex-cult members have further proven cult dangers. As Dr. Paul Martin points out, there are 'countless tales of woe related by thousands of former cult members.'" Pages XXII – XXIII

"The consequence of cults related to overall health is an often neglected problem:

'Compared to other social or medical problems, the havoc created by destructive cultism... is the most under-studied, neglected and ignored mental and social problem in the world. (The most conservative estimates based on a number of surveys are that 185,000 Americans alone join a destructive cult each year. Of those 185,000 at least 25% will suffer enduring irreversible harm that will affect their ability to function adequately in the emotional, social, family, and occupational domains.) The rate of numbers of people joining destructive cults in other countries equals or exceeds the rates observed in the United States.'⁸

"According to the *Journal of the American Medical Association*, June 10, 1998, some irrational folk beliefs, beliefs often found in the cults, may even be responsible for some forms of cancer." Page XXIII

"Almost every chapter in this Encyclopedia has a section on the occult. What the Berkeley-based Spiritual Counterfeits Project noted over 20 years ago in its *Newsletter* of Jan./Feb., 1979 remains true today: 'Our research has revealed that the lowest common denominator is often that of direct spirit influence.' In similar confirmation, religion professor Dr. Robert S. Ellwood, of the University of Southern California, wrote in his text covering some 40 new religions, *Religious and Spiritual Groups in Modern America* (1975, p. 12), that one of the most potent and destructive forms of spiritism, shamanism, 'has striking parallels to all the groups under consideration in this study. The cult phenomena could almost be called a modern resurgence of shamanism.' As we pointed out in Volume One, the widespread acceptance of shamanism and spiritism will cost a society dearly in terms of moral, social and even economic consequences." Page XXIV

"When people are manipulated in different ways for ulterior motives, as cults are shown to do in this Encyclopedia, is not this to be condemned? Those cult leaders or gurus who have encouraged their followers to oppose moral convention, denied their followers blood transfusions and medical access, encouraged prostitution for making converts, sometimes raped women, beaten their disciples, molested children, practiced black magic and witchcraft, engaged in drug smuggling and other criminal activity, including murder—do they not deserve the condemnation of us all? And such things have occasionally happened even in what many people regard as the 'respectable' cults." Page XXV

Assuming then that all the groups in ECNR are in fact cults, how much blame should each one share for the horrific things attributed to them? ECNR answers: "Of course not all cults are equally culpable when it comes to unsavory teachings and practices, but enough are. What we have discussed in this Encyclopedia stands as a testimony to what we say about the continuing relevance of the term cult. And it must be remembered that what is recorded is merely the tip of the iceberg." Page XXVI. "Enough are," "What we have discussed in this Encyclopedia stands as a testimony," and "only the tip of the iceberg" paint every group in ECNR with what has been written as well as with the rest of the "iceberg."

"Frivolous lawsuits" are another reason the authors did not present the "many documented things that we could not even mention or discuss in this work." Page XXVI. This adds the charge of intimidation and encourages the reader's imagination as to what terrible things are not written about in ECNR.

"Barring illegalities, or perversions, Christians are certainly 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." Page XXVI

"The approach that we have taken in this Encyclopedia is to illustrate as best we can, given legal threats, that the cults do pose a significant threat to society." Page XXVIII

"Virtually all cults and new religions deny almost all key biblical doctrines..." Page 661

"All cults must somehow undermine the authority of scripture." Page 672

"All cults and religions deny the unique incarnation of the Second Person of the Godhead." Page 678

"If there is one biblical doctrine the cults universally deny (generally they deny almost all of them)..." Page 678

"...all groups discussed in this volume accept occult powers to some degree..." Page 708

"The cults universally promote idolatry.... Anyone who has studied the effect of idolatry on a people and its culture, whether in the ancient world or in places such as modern Asia and Africa, knows the reasons for the powerfully uncompromising biblical stand against it. 'You must not worship the LORD your God in their way, because in worshiping their gods, they do all kinds of detestable things the LORD hates. They even burn their sons and daughters in the fire as sacrifices to their gods...' (Deuteronomy 12:51)." Page 721-722

EXHIBIT E to
APPENDIX TO LETTER TO MR. ROBERT C. HAWKINS

ECNR's Use of "Cult" as a Defamatory Term

No argument can be made from the language in ECNR that the word "cult" is not defamatory. The authors admit that they chose the word for the force that it has in contemporary culture, and they recognize its ability to call up images such as David Koresh's Branch Davidians, Jim Jones' Peoples' Temple, Aum Shinryko's nerve gas attack, and the UFO suicide cult, Heaven's Gate. The word "cult" -- which appears in the book's very title to characterize all the groups discussed within -- creates the very intolerant reaction that the authors admittedly seek to provoke in readers against the groups that the authors have decided "deserve it," including the Local Churches. ECNR does not draw a distinction between "Cults" and "New Religions," but instead it says that "we should view the new religions" as "deserv[ing] the title" of "cult." It is clear that ECNR tars all the groups with the same brush. Exhibit D quotes examples of the language used by the authors to clarify that their characterizations apply to all of the groups, including the Local Churches. The effect is to make all the negative traits throughout ECNR of and concerning the Local Church.

Both the authors and publisher are legally responsible for ECNR's false statements about the Local Churches and related persons. That includes not merely statements made explicitly about the Local Churches, but also false implications, false impressions, misquotations, and opinions that are premised on false factual assertions. The many nefarious traits and innuendoes of cults discussed generally in ECNR are imputed to the Local Churches due to the book's inclusion of the Local Churches. It makes no difference whether ECNR's numerous characterizations of cults occur within or without the chapter devoted to the Local Churches. It also makes no difference whether the offending sentences explicitly name the Local Churches as their subject. Legally speaking, its publisher and authors are liable to the Local Churches for what ECNR conveys about cults generally, and not merely for the literal statements made about the Local Churches specifically. It is not just the statements specific to the Local Churches, but the context in which ECNR has discussed the Local Churches, for which a court would find its authors and publisher responsible. This legal conclusion is only fair because the average reader would reasonably read onto the Local Churches the many anti-cult characterizations he finds in ECNR, including its Introduction and Doctrinal Appendix.

Unsurprisingly, ECNR does not detail the evidence used to draw the negative implications and conclusions about the Local Churches. This vacuum of evidence, leaving the reader to believe that an investigation by ECNR's authors and publisher has uncovered evidence that they have chosen not to disclose, only strengthens a case for liability to the Local Churches.

The sampling of quotes in Exhibit D and E (below) demonstrates that the authors of ECNR intentionally treat all of the groups as the single subject for their negative characterizations, *e.g.*, "these groups." No attempt is made to differentiate or distinguish the Local Churches and their members from the groups and people who commit the atrocities described in the Introduction and Doctrinal Appendix. Because of its so-called encyclopedic format, ECNR is not designed primarily to be read cover to cover. Instead, the reader who is interested in learning about a particular group will most often read the chapter on that group in the immediate context of the Introduction and, perhaps, the Doctrinal Appendix. In such a format, the mere inclusion of Witness Lee and the Local Churches as an entry in ECNR is as hard-hitting and damaging as if we were the only group covered. In this way, the bulk of the many other chapters serve -- not to dilute the defamatory effect of our being included in the book -- but to strengthen the book's aura of supposedly being a scholarly and authoritative work.

The following quotes illustrate how the authors of ECNR themselves expressly define "cult" as having a meaning that would objectively lower the Local Churches in the estimation of the public, Christian and non-Christian, and to deter third persons from associating or dealing with them.

* * * * *

"The groups in this encyclopedia often illustrate larger cultic themes and their implications for our society. For example, collating the 'moral concerns' sections alone would prove to be an enlightening study on the ethical implications of the cults and new religions. Page VIII

"Used properly, the term "cult" also has particular value for secularists who are unconcerned about theological matters yet very concerned about the ethical, psychological and social consequences of cults; although, as we will see, there are dangers for the church here. Page XXI.:

"And what is the point of being tolerant of everything when many thing we tolerate now, including the cults and new religions, are clearly harming us, our children and our society." Page XIX.

"While 'spiritual counterfeits' is good, it does not convey the contemporary force of the term 'cult'....The use of terms such as 'alternate faiths' or 'new religious movements' tend to imply that all religions have equal validity, which does not convey what needs to be conveyed about the groups in this Encyclopedia." Page XXI. *Indeed, the authors invalidate their own use of "new religions" in the book's title by this statement.*

"For our purposes, and from a Christian perspective, a cult may be briefly defined as 'a separate religious group generally claiming compatibility with Christianity but whose doctrines contradict those of historic Christianity and whose practices and ethical standards violate those of biblical Christianity.' A more expanded definition would include: 'any religious organization (not a standard world religion): 1) promoting the indoctrination ('to teach to accept the system of thought uncritically') of unbiblical theology in key doctrinal areas; 2) demanding submission to a unbiblical authoritarian structure, or an individual leader; and 3) promoting excessive spiritual or psychological regulation or dependence.'" Page XXII

"Religious pluralism is a good thing only if the cults and new religions are a good thing. The problem is that they are not. The difficulty is that a counterfeit initially looks so good and feels so good that one rarely suspects something is wrong. Only when the counterfeit is examined and compared with the real thing does the counterfeit become apparent by then it's often too late." Page XVIII

"Properly defined and understood, the term 'cult' is not necessarily pejorative, just descriptive. And with varying degrees of applicability, the groups herein deserve the title, even if they disagree. If, after a reading of the evidence, the shoe actually fits but no one wants to wear it, that is not the problem of a descriptive term. It is not just the truth that has bedeviled the term cult, it is the cults themselves—what they do and believe." Page XXI. *When this affirmation is put together with the definition and characteristics of a cult, it is defamatory in any "varying degree."*

"A cult should also be distinguished from what we may term an aberrational Christian group that is more or less doctrinally sound but contains some or many of the behavioral or other aberrations found in cults: authoritarianism, isolationism, financial exploitation, elitism, legalism, spiritual and psychological intimidation." Page XXII

The section titled "Characteristics of Cults" applies directly to the characteristics of "cults and new religions that we have documented...in this current Encyclopedia on the cults and new religions." Page XXIII. The list of cult horrors that then follows is never precluded from applying to any group, thus the reader may assume they apply to each group covered.

"Another problem with the term 'cult' is that, in many quarters today, the plea is made that the term be restricted to bizarre or negative fringe groups where a more pejorative term is justified. The idea is that new religions generally do not deserve the term cult. For example, in How Wide the Divide: A Mormon and an Evangelical in Conversation (Inter-Varsity 1997, p.195), we read that Mormonism does not deserve the term: 'it should be reserved for the kind of small, bizarre fringe groups sociologists more technically label as cultic (such as those lead to their deaths by Jim Jones or David Koresh).'....The decision to use or not use the term cult takes us to the issue of how we should view the new religions from the vantage point of not just orthodox Christianity but also common social convention. Despite the cultural breakdown in America, there are still often agreed upon standards of right and wrong, decency, the importance of trust and so on. It would seem that neutral terminology is not deserved when the new religions are almost universally deceptive, frequently reject common moral concerns and often harm people in different ways. Thus, what if the term 'cult' in a generally negative sense really *is* [their emphasis] appropriate? Of course, for the overly tolerant we arrive back at the issue of 'sensitivity' and not wishing to offend people by referring to their religion as a cult. Apparently, we are not to offend anyone even if it costs people their peace of mind, family, finances, overall health, sanity or soul." Page XXV. *It is clear that the term "new religion" was used, not to show any difference from a cult, but for the "overly sensitive."*

"So is it 'bad faith' or 'intolerance' to criticize a cult or new religion, if its beliefs and behavior deserve exposing?" Page XXVI