

**IN THE VOLUNTARY COURT OF CHEON IL GUK**

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Jamal Johnson  
15 Lions Street  
East Stroudsburg, PA 18301  
Plaintiff,  
  
v.  
  
Lourdes Swarts  
World Peace and Unification Sanctuary, Inc.  
889 Main Street  
Newfoundland, PA 18445  
Defendant.

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**COMPLAINT**

**INTRODUCTION**

1. This is an action by Jamal Johnson, a citizen of Cheon Il Guk<sup>1</sup>, against Defendant, a public official, pursuant to principles of the Constitution of the United States of Cheon Il Guk (“CIG Constitution”), including Principle II, Right I (“right to petition the Government for a redress of grievances”), by exercising a sovereign citizen’s authority and responsibility over public officials who are in servants’ position under the principles of CIG Constitution.<sup>2</sup>

2. Plaintiff brings this claim against Defendant to seek redress for violation of the principles of CIG Constitution, including that of Article III, Section 8, Clause 25 (“Harassment and Abuse

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<sup>1</sup> Although the actual nation of CIG did not exist, True Father already called people “citizen of Cheon Il Guk” in 2006: "Beloved citizens of Cheon Il Guk, today you are receiving amazing grace. You are participating in the coronation ceremony of the substantial King of Cosmic Peace, and you are being registered as citizens of Cheon Il Guk. Not only you, but also your ancestors by the tens of thousands will thank you throughout eternity for the grace they are receiving along with you today."(Sun Myung Moon, June 13, 2006). Accordingly, it is clear that True Father’s wish was/is that we are (to be) citizens of Cheon Il Guk. In order to honor, respect, and follow True Father’s wish, Plaintiff as a blessed central family not only considers himself a citizen of CIG, but also claims and declares into the atmosphere that he is a citizen of CIG which is by the grace of True Father, because “Father’s wishes reign supreme!” (The Second King, Sunday Service - August 20, 2017: <https://vimeo.com/230360888> @ 1:16:52)

<sup>2</sup> “It is God himself, the mastermind of it all, the great architect of it all that has the relationship with us that has given us the Constitution that will protect humanity and that will - oh, yes it will - put all the archangels under the good people's feet.” (The Second King, Sunday Service - August 6, 2017, <https://vimeo.com/228577379> @ 1:45:30)

by Bureaucracies”<sup>3</sup>, Article III, Section 9, Clause 16 (“Acknowledgement of the Principle of the Sovereign Citizen”)<sup>4</sup>, Article IV, Section 2, Clause 5 (“Clandestine Acts of Terror against the CIG Citizens with the Intent of Molding Public Opinion”)<sup>5</sup>, and Article VI, Section 1 (“Oath/Affirmation to support CIG Constitution”)<sup>6</sup>.

## JURISDICTION

3. The jurisdiction of this Court (Voluntary Court of Cheon Il Guk) is based on the Second King’s appointment of the judge to convene this Court, in and from his “rightful place as King of the Second Kingship of the Kingdom of God, Cheon Il Guk, as the Crowned Successor and Representative Body of the Cosmic True Parents of Heaven and Earth and full Inheritor of the Kingship of God, with all the authority endowed by [his] Father, Sun Myung Moon – The True Father, Messiah, Lord at the Second Advent and King of Kings”<sup>7</sup>, the parties’ voluntary submission to such authority of the Second King of Cheon Il Guk, and the parties’ consent that the Court has personal jurisdiction thereover such that the parties are to be bound by the decision of the Court.<sup>8</sup>

4. Article I, Section 7 of CIG Constitution provides: “Under the authority of the king, the office of Inspector General is formed. This office shall have unrestricted access to all

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<sup>3</sup> “Congress shall pass law protecting citizens of CIG from being harassed or abused by government bureaucracies. Congress shall provide for the recovery of treble damages and full recovery of legal fees and related expenses for wrongful bureaucratic action.”

<sup>4</sup> “The government agrees with and acknowledges the principle of the sovereign citizen and recognizes that private property is an extension of that sovereign citizen. Congress is prohibited from passing any law which damages or compromises the value of private property without just compensation.”

<sup>5</sup> “The President and the executive branch are prohibited from carrying out clandestine acts of terror against the citizens of the United States of CIG with the intent of molding public opinion (false flag operations). Any suspicions of “false flags” will be investigated by the Inspector General. “False flags” will be considered to be an act of levying war against the people of CIG.”

<sup>6</sup> “The Senators and Representatives before mentioned, and the members of the several state legislatures, and all executive, judicial officers, and Kings both of the United States of CIG and of the several states, shall be bound by oath or affirmation, to support this Constitution.”

<sup>7</sup> The Constitution of the United States of Cheon Il Guk, Preamble.

<sup>8</sup> Defendant failed to comply with a Court Order of July 27, 2017 by refusing to sign one of the statements: “I ... consider myself a Citizen of Cheon Il Guk, support the principles of The Constitution of the United States of Cheon Il Guk, and agree to be bound by the decision of this Court. I reserve my right of appeal”; or “I ... do not consider myself a Citizen of Cheon Il Guk, and do not support the principles of The Constitution of the United States of Cheon Il Guk to the extent that I acknowledge its authority,” whereby Defendant effectively declared that she was “not a Citizen of Cheon Il Guk” as stated in a previous Court Order of July 26, 2017. Defendant demonstrated her denial of the authority of the Court conferred by the Second King. Due to Defendant’s refusal and effective denial of CIG citizenship, the precious case (Court of The United States of Cheon Il Guk, Civil Division, Case No. 2017 PA 0721-1) was dismissed without prejudice on August 7, 2017.

documents (data) in the governments of CIG and will carry out the function of investigating and bringing prosecutions against any individual working in the governments of CIG including bringing impeachment proceedings against the President or prosecutions of individuals being contracted by the governments of CIG. This office is given to Moon Kook Jin and to his heirs.”

5. Thus, as the Second King exists in/as Moon Hyung Jin with all the authority endowed by The True Father, Messiah, Lord at the Second Advent and King of Kings, the office of Inspector General also exists in/as Moon Kook Jin under the authority of the Second King as such and the principles of CIG Constitution at least in image<sup>9</sup>.

6. The language of CIG Constitution for the Office to “carry out the function of investigating and bringing prosecutions against any individual working in the governments...” does not prohibit the Office to have or request to form a court (adjudicating body) as part of its carrying out the aforementioned function.

7. In addition, since it would be practically impossible for the Office to watch and monitor every one of the public officials, it is also reasonable and desirable to allow wronged citizens to bring up a case (filing) before the Office. Then the Office can sua sponte conduct further investigation, if necessary, based on such a filing since the Office has unrestricted access to all documents (data) in the governments of CIG. At the same time, such a court also provides Due Process<sup>10</sup> for the accused public official to defend him/herself against the allegations by citizens.

8. Accordingly, this Court, convened by the King’s appointing the judge in response to Inspector General’s request which was prompted by a filing by Plaintiff, a citizen of CIG, against Defendant, a public official, may be construed as a court under the principles of Article I, Section 7 of CIG Constitution under the direct authority of the King and within the functions of the Office of Inspector General (not a judicial court under Article II, Section 1 which requires consent of the Senate which does not exist yet).

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<sup>9</sup> Defendant herself wrote, “Try to help build unity instead of trying to “correct” me. It is the Pastor’s role to do that. He and the Inspector general. I work with them on a regular basis. They are the ones I report to.” (Exhibit K)

<sup>10</sup> Principle II, Right V of CIG Constitution (“Due Process”).

9. Thus, neither this Court nor the King's appointment of the judge is unconstitutional<sup>11</sup> under the principles of CIG Constitution<sup>12</sup>, and has full authority and power over consenting parties under the principles of CIG. As the King stated in the Sunday Sermon of August 13, 2017, this Court would provide a process for developing jurisprudence in the Sanctuary under the principles of CIG Constitution first time in the history of the movement so as to make public officials be held accountable.<sup>13</sup>

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<sup>11</sup> Unconstitutionality of the King's action was alleged by Timothy Elder as follows (FB post on July 29 at 8:50am): "Let's not kill the USCIG Constitution before it even gets off the ground. It would be a violation of the Constitution for the King to create a USCIG court. Only the Cheon Il Guk Congress has this power. Also, any judicial appointments to such a court must have the consent of the Senate. I think it is good that this case is being heard, but let's do it in a way that preserves the integrity of the USCIG Constitution."

<sup>12</sup> The effectiveness of CIG Constitution was also denied by Timothy Elder as follows (FB post on July 28, 2017 at 2:09 pm): "The Constitution of the United States of Cheon Il Guk deserves to be respected as 'a Constitution of a real and sovereign future nation being the literal fruit of God's Providence.' (Preamble) We should not disrespect it by relegating it to the position of a prop in someone's game of make-believe."

The process for establishing this nation is clearly spelled out in the Constitution for anyone who respects the document enough actually to read it.

The first step is to elect a Congress that is composed of a House of Representatives and a Senate (Principle III, Article III, Section 2). Who gets to vote in this election is not specified in the Constitution, so it falls to the State(s) to determine this under Principle II, Right X.

The House of Representatives elects a President (Principle III, Article IV).

Once the Congress has been constituted, the King can begin appointing justices of the Supreme Court with the consent of the Senate. Also, once the full Congress has "established and ordained" lower courts, he can begin appointing judges to those courts or delegate this task to the President.

Also, the President can begin to hire government employees. The people he hires will be under the jurisdiction of the Office of the Inspector General.

None of the above has taken place. To pretend otherwise is to engage in a game of make-believe that substitutes virtual reality for actual reality.

It is make-believe to suppose that the Office of the Inspector General (which does not exist) of Cheon Il Guk (which does not exist) has jurisdiction over staff members of Sanctuary Church. The jurisdiction of this office (which does not exist) is defined in the Constitution as "any individual working in the government of CIG" and "individuals being contracted by the governments of CIG."

The government of CIG does not exist, as I explained above. Even if it did, staff members of Sanctuary Church are employed by a private organization. So it would be unconstitutional for the Office of Inspector General (which does not exist) to attempt to exercise jurisdiction over Sanctuary Church staff members.

The Jamalites have yet another problem. Even if the Office of Inspector General (which does not exist) had jurisdiction over a Sanctuary Church staff member (which it does not), in which court should this non-existent Inspector General prosecute this staff member?

Their virtual reality Inspector General will have to exercise his virtual reality jurisdiction in a virtual reality court because there will be no actual reality Cheon Il Guk courts until the actual reality constitutional process outlined above is allowed to run its course in actual reality."

<sup>13</sup> The King's words: "It is important to make people... who committed large crimes be held accountable before at least ecclesiastic jury and jurisprudence, which of course God is leading us to develop here in the Sanctuary first time in the history of the movement. Probably, all of you've heard, 'Lourdes' and Jamal's case is stopped and discontinued!' But it is not – it is going to continue. God is sending us these tasks to do in the image of Cheon Il Guk." (Vimeo: <https://vimeo.com/229489192> @ 2:09:40 - 2:10:30)

## APPLICABILITY OF CIG CONSTITUTION

10. Cheon Il Guk, The Kingdom of God, a sovereign and actual nation does not yet exist in this world<sup>14</sup>, and the political and legal establishment of CIG is yet to come. However, Hyung Jin Moon, taking his rightful place as King of the Second Kingship of the Kingdom of God<sup>15</sup>, promulgated CIG Constitution on October 11, 2015, which is deemed to immediately take effect<sup>16</sup> at least in image for the people who have returned under True Father's authority.

11. Thus, although external aspects of CIG Constitution cannot be implemented and/or enforced until the actual nation of CIG is established, those who have returned to under True Father's authority as the CIG citizens should abide by, be protected, and be bound by the principles of CIG Constitution as much as possible and practically feasible in preparation for establishing the actual nation of CIG.

12. World Peace and Unification Sanctuary, Inc. ("WPUS, Inc.")<sup>17</sup>, which is a religious organization, has chosen to use principles of CIG Constitution to resolve a dispute.<sup>18</sup> The preamble of CIG Constitution states that "in the Garden of Eden, God's original world of freedom, liberty, conscience, and relationship with God was to be established, which was to be a world where the powerful archangels were to be the servants of the children of God. However, due to the Fall, the world of Satan's dominion over mankind was established and history has shown centralized powers, either governmental, religious or financial, use artificial structures and powers to rule over mankind ..." Thus, religion is also recognized as one of centralized powers that use artificial structures and powers.

13. Accordingly, when World Peace Unification Sanctuary, which is the King's ministry, is considered as a nation of CIG in image, World Peace and Unification Sanctuary, Inc. is

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<sup>14</sup> The Constitution of the United States of Cheon Il Guk, Preamble.

<sup>15</sup> *Id.*

<sup>16</sup> The King stated in front of witnesses at the long table at the Cheon Il Goong Palace ('Heaven's Palace') May 2017, in Matamoras, PA, that the CIG Constitution needs to applied now and not only someday in the future.

<sup>17</sup> "WPUS, Inc." indicates an incorporated religious organization, while the title "World Peace and Unification Sanctuary (世界平和統一聖殿)" given by True Father to Hyung Jin Moon may be recognized as the Second King's ministry, not an organization per se.

<sup>18</sup> Per the judge's notice of August 14, 2017, which reads, "World Peace & Unification Sanctuary, Inc. has chosen to use principles of The Constitution of the United States of Cheon Il Guk (USCIG) to resolve a dispute. The name of the court is "Voluntary Court of Cheon Il Guk." The King has appointed me judge for this matter. Since this court is specifically authorized by the King, I trust you will participate."

a governing organization functioning as a government of CIG in image which supports the King's ministry and servers blessed central families under True Father's authority as citizens of CIG in image.

14. WPUS, Inc. has full-time public officials, including Dr. Richard Panzer (President, Unification Sanctuary- USA), Greg Noll (Administrator), Timothy Elder (Director of World Missions), Lourdes Swarts (Director of Events and Secretary to the World Mission Dept.).<sup>19</sup> Thus, in accordance with the principles of CIG Constitution in image, Article I, section 7 is fully applicable to the public officials of WPUS, Inc. who are individuals working in or being contracted by the governments of CIG in image.

## STANDING

15. It was declared by the Second King that "all peoples [i.e. citizens] of the Kingdom of Heaven, Cheon Il Guk, are the sovereign children of All-Mighty God, of Christ who became flesh and gave us Immeasurable Grace by engrafting us to God's Life, God's Love and God's Lineage. This endows all human beings of the Kingdom of God, with immutable and inalienable rights, that originate from their Creator, God Himself, through the physical Kingship of Christ established at His Second Coming as the True Father, Sun Myung Moon."<sup>20</sup>

16. The Second King of CIG, Hyung Jin Moon clarified in his sermon of March 6, 2016 that people or CIG citizens, including Plaintiff, have the right as follows:

- a. "People have human rights – you can redress your grievances with public officials. Staff members are public officials."<sup>21</sup>
- b. "If you see things that are unrighteous, or you see things are not right with the public figures here, you can confront them."<sup>22</sup>

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<sup>19</sup> Actual organizational structures of WPUS, Inc., SC-USA, and the like will be determined or clarified.

<sup>20</sup> CIG Constitution, Preamble.

<sup>21</sup> 1:12:35 time stamp on Vimeo, <https://vimeo.com/157932205>

<sup>22</sup> 1:12:26 time stamp on Vimeo, <https://vimeo.com/157932205>

- c. “One of the human rights of Cheon Il Guk is redress of grievances - you are supposed to be able to redress your grievances to a public official. So that is your right.”

## **PARTIES**

17. Plaintiff Jamal Johnson (“Johnson”) is a sovereign citizen king of CIG residing at 15 Lions Street, East Stroudsburg, PA 18301.

18. Defendant Lourdes Swarts is a public official and an employee (“Director of Events and Secretary to the World Mission Dept.”) of World Peace and Unification Sanctuary, Inc. (“WPUS, Inc.”, “Sanctuary Church” or “the Church”) located at 889 Main Street, Newfoundland, PA 18445.

## **STATEMENT OF FACTS**

### **A. Defendant as a Public Official**

19. Defendant has a salaried staff position in the World Peace and Unification Sanctuary, Inc., employed as Director of Events and Secretary to the World Mission Dept. and thus is a “public official” and a “public figure.”

20. The church office stated that Defendant is “responsible for event management and assist Tim Elder (“Director of World Missions, World Peace and Unification Sanctuary”) in the world missions dept.”

21. On March 6, 2016 Hyung Jin Moon (“the Pastor”) stated in a Sunday speech and sermon that “She’s [Lourdes Swarts is] working with the staff so she’s a public figure.”

22. Defendant’s public email signature also indicates that Defendant is acting as a public official, which reads: “Lourdes Swarts, Sanctuary Church, Director of Events and Secretary to the World Mission Dept.” in the public official’s public email (WPUS, Inc.) address ([Lourdes@sanctuary-pa.org](mailto:Lourdes@sanctuary-pa.org)).

23. Defendant has also acknowledged, indicated, and/or professed that she is a public figure and a public official in her public capacity and official position, by making statements pertaining to the official public position such as “I am the Secretary to the World Missions and work on communication and development” in communicating with Plaintiff (Exhibit A), and posting on a Facebook (“FB”) group site “I work managing the World Mission.” (Exhibit B).

### **B. Facebook Group as Public Forum**

24. Defendant created, operates and manages an FB group [social media online site] titled “The UC and the Truth, because only the truth will set us free” (“The UC and the Truth”) using an alias Lisa Zanin in December 2014 and then Sanctuary supporters, including Plaintiff, were invited to contribute to “The UC and the Truth” online site in February, 2015 (Exhibit C).

25. “The UC and the Truth” continued to grow as an online campaign encouraged by the Pastor Hyung Jin Moon, in which Plaintiff actively participated and also helped with the growth of the group.

26. “The UC and the Truth” now has about 5,000 members, which is the largest number among the Sanctuary-related FB groups many of which are also created and managed by Defendant.

27. Defendant often claims that “The UC and the Truth” is her personal property and thus she can do what she wants when she removes/bans members and delete posts (Exhibit D).

28. However, Defendant also promotes “The UC and the Truth” as if it is an official site of Sanctuary Church by stating: “Out of this site we have been building the World Mission Depart. This is not a joke for me.” (Exhibit E).

29. In the light of paragraphs 19 and 28 above, “The UC and the Truth” is a public forum operated by Defendant as a public official.

30. Thus, Defendant’s power as an administrator of the FB group site to remove or block a person from the group, and to delete any posts therein is that of a public official managing the public forum.



31. In addition, in the image of CIG, “The UC and the Truth” and other FB groups function with basic similarity to news media where various information, opinions and points of view are exchanged or disseminated.

### **C. Plaintiff’s Participation and Defendant’s Banning Plaintiff from the FB Sites**

32. In January 2015, Plaintiff posted comments on the Pastor’s YouTube channel, arguing on behalf of the Pastor, against a fellow YouTube patron (“YouTuber”) who strongly disagreed with the Pastor and the Pastor’s theological position.

33. Days later, after seeing Plaintiff’s argument, the Pastor expressed gratitude for the Plaintiff’s willingness to argue with theologians, despite the fact that Plaintiff’s arguments included rough language.

34. The Pastor’s elder brother (Kook Jin Moon) also encouraged people in a meeting to go out and argue in a manner like that of the Plaintiff and assert the truth of our theological position unapologetically.

35. Observing the Pastor and his brother’s favorable acknowledgement of Plaintiff’s online activities, Defendant invited Plaintiff to participate in “The UC and the Truth” in February, 2015, via FB personal messages asking to help “us.”

36. Plaintiff invested his time and knowledge to offer theological clarifications to hundreds of other participants of the FB group, and also helped in the early effort to reach 1,000 total group participants, by inviting others to the group.

37. However, Defendant interrupted the Plaintiff in his efforts to win over theological and other arguments against opponents in the online campaign due to “rough treatment of others” and/or “use of expletives” by repeatedly removing Plaintiff (an act known as banning) from “The UC and the Truth,” despite the fact that these behaviors were publicly lauded and encouraged by either the Pastor or his chief advisor (and elder brother) Kook Jin Moon<sup>23</sup>.

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<sup>23</sup> Hyung Jin Moon and Kook Jin Moon would support what Plaintiff was doing by saying emphatically and publicly, things like: “Did you see what Jamal said online”; “Did you see how Jamal and Robert are dismantling the scholars”; “You guys are the ring of fire”; “Keep it up”; “These UTS guys need to be taken down a few pegs

38. For example, in the summer of 2015, the Pastor stated as guidance to Plaintiff that it was detrimental to our cause to ban Plaintiff on the grounds of harsh language. With Kook Jin Moon, Plaintiff and Defendant all present, the Pastor said “If Jamal is arguing with someone, and the other side complains about his language and you ban him for that, then you are helping the other side.”

39. Notwithstanding the Pastor and his brother not being concerned about Plaintiff’s rough language, Defendant repeatedly contacted Plaintiff via FB messages, complained about Plaintiff’s language in his posts, and banned Plaintiff multiple times, effectively siding and aiding opponents of the Pastor and the Church’s theology.

40. Accordingly, Defendant frustrated Plaintiff’s sincere effort as a CIG citizen to tell the truth and defend and promote the Pastor’s position as the second King, and blocked Plaintiff’s offering to the online campaign using Defendant’s public position and the power associated therewith (paragraph 30).

41. As Defendant’s action contradicted the Pastor’s intention and will to allow Plaintiff to continue arguing and debating on the FB group site without opposition from his fellow sanctuary supporters, while her action was made under the color of public office as a staff member to the Pastor, her action constituted abuse of the public power against Plaintiff outside her mandate to serve the Pastor.

42. Defendant used her public position to make her private mission look like a public mission endorsed or authorized by the King or the Church, and then used that look-alike public mission to not only invite Plaintiff to expend his energy in the public interest, but also frustrate him in those efforts against the wishes of the King, sacrificing the public interest.

43. Defendant continued using her public position and the look-alike public mission to obtain contributions from others, while deleting posts by Plaintiff and others, banning and removing Plaintiff and others from the FB group in order to preserve or protect her desirable personal

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anyway”; “If they can’t see that what mother [Han Hak Ja] is doing is wrong, then those degrees aren’t worth anything anyway.”

image for her private mission at the cost of the public interest and even by violating the FB group's own rules and guidelines<sup>24</sup>.

44. Furthermore, Defendant posted the reasons of banning Plaintiff on another FB site, alleging, "[...] and Jamal Johnson do not post regularly in our UC and the Truth site. They came to the site want the only one intent to disrupt the site. They posted irrational accusations that are unproven, disrespectful to our faith community and damaging to our work." (Exhibit D).

45. In the light of Plaintiff's contribution to "The UC and the Truth" site stated above, Defendant's allegation in paragraph 44 above is irrational, unproven, and disrespectful.

#### **D. Defendant's Avoiding Accountability, and Personal Campaign Against Plaintiff**

46. Plaintiff who promotes and practices "Kingdom mentality" does not agree with Defendant's frequent promotions of "Church mentality" often expressed in her FB posts and statements. At times, this ideological/political disagreement alone was the cause of heated arguments on FB groups between Plaintiff, Defendant, and other independent persons who concern themselves with the matter.

47. Defendant has alleged that she is "an official representative of the church" and "a church public official and an extension of the Kingdom," and thus any "negativity related to my [Defendant's] name affects our work" and is not acceptable. (Exhibit F).

48. Defendant uses her public position as a shield from any criticism, as if public officials are immune from any criticism, making herself inviolable by claiming herself an official representative the church so as to avoid any accountability as a public official.

49. Not only avoiding accountability, Defendant also uses her public position, "The UC and the Truth" and other FB sites, her reputation as a public official, and accomplishment or work that has been done as the church to influence others, to silence or change Plaintiff's behavior.

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<sup>24</sup> David Konn who is a current chief admin of "The UC and the Truth" site wrote recently (August 17, 2017) as follows: "...we are struggling to keep Lourdes from violating our own guidelines so we are not stable."

50. For example, Defendant used words from The King's Report broadcast to make personal attack against Plaintiff when in fact the words from The King's Report had nothing to do with Plaintiff, and called for the community to stand against Plaintiff using "The UC and the Truth" public forum and wrote, "'Reputation is very important in CIG.' Tim Elder, the King's Report today. A few minutes ago. For that reason let me say, Jamal has the freedom to say whatever he wishes – to cause harm, to attack, to bully, he is free. The community needs to stand up and make a correction. The King will not do so." (Exhibit G).

51. Defendant's statement about Plaintiff's freedom of speech is at least misleading as Defendant actually banned Plaintiff from her FB site. By citing words from the King's Report, and by saying "the King will not do so," Defendant was trying to invoke false notions or feelings in the "community" that they should help Defendant on behalf of the King to "correct" Plaintiff.

52. Defendant also invited and solicited the FB community as "the more people come forth and speak up the faster the two brothers<sup>25</sup> will change," by combining an impression of how well Defendant was achieving many good results ("incredible work") as the event coordinator ("There is so much positive going on here. It will take all day to list them.") with her personal attack against Plaintiff. (Exhibit G).

53. Furthermore, using the color of Defendant's public position managing the Church's programs and/or projects, Defendant publicly discredited and degraded Plaintiff, stating, "I have not seen or heard anyone here that agrees with the two brothers. Actually most people here are completely, 120 % against what Jamal and Robert are doing." (Exhibit H), which was untrue<sup>26</sup>.

54. Similarly, when a 1,000-signature campaign to oppose Family Federation's trademark registration of Cheon Il Guk achieved the goal, Defendant who initiated the campaign reported the victory on "The UC and the Truth," writing, "A great big THANK YOU for helping achieve the goal of 1000 plus signature for the Cheon Il Guk trademark Petition.... this is indeed great effort by you, Citizens of CIG. Thank you. Let's offer all glory and praise to our Heavenly Father. True Father and our beloved King!" (Exhibit I).

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<sup>25</sup> Plaintiff Jamal Johnson and Robert Pickell.

<sup>26</sup> On the contrary, as the King stated in the sermon of March 6, 2016, it is Defendant that practically everybody has struggled with: "This time, through this event...almost every single one of you that I can see...almost every single one...mentioned to myself or my wife, 'Lourdes is doing this. Lourdes is doing that. She's driving me nuts. Blah, blah, blah.'" 57:40 time stamp on Vimeo, <https://vimeo.com/157932205>

55. After a short first paragraph of reporting the achievement of the goal, Defendant all of a sudden mentioned “On another matter” and started attacking “some folks,”<sup>27</sup> while praised herself as a public official with a good character and her public work, which became the main part of Defendant’s post. (Exhibit I).

56. Defendant’s reporting about the signature campaign (paragraph 54) gives readers a notion that Defendant is acting as a public official in charge of such a campaign, and the positive and victorious content of the post itself draws attention from many people, effectively leading the large audience to read Defendant’s one-sided allegation against “some folks” which is irrelevant to the victory of the 1,000 signature campaign.

57. Defendant referred to “a great number of people asked me, why don’t you defend yourself against some folks....” (Exhibit I). Such a mention to “a great number of people” would look more credible since the mention is combined with the accomplishment of the 1,000 signatures.

58. Defendant further makes mentions of the King and Queen, Kook Jin Nim, and Timothy Elder, then writes about “my experience working here” and makes a statement “help develop the WORLD MISSIONS,” which are privileges of being in a position of a staff member (a public official) –all which are used to uplift her personal character in order to discredit the Plaintiff and induce bad feelings against the Plaintiff among the readers.

59. Defendant also enlists and uses a willing individual to collect posts negatively mentioning the Plaintiff, by making the claim that “the King wanted to see a summary of these posts,” taking advantage of her official public position as part of the King’s staff (Exhibit J). This specific individual has engaged to post many posts on a number of FB group sites, casting a negative image of the Plaintiff.

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<sup>27</sup> Indicating at least Plaintiff Jamal Johnson and Robert Pickell.

## **E. Defendant's Failure to Acknowledge that Public Official is a Servant to CIG Citizens**

60. Defendant's superior Timothy Elder clearly stated in his post on June 6, 2017, on FB, that "Members of the King's staff are servants to Blessed Central Families who are in True Father's authority." (Exhibit K).

61. Notwithstanding Defendant's superior's correct statement (paragraph 60), Defendant is unable to understand a position of servant with respect to CIG citizens, stating, for example: "I do not see the King relating to him [Tim Elder] as his "servant." He is a counselor, and advisor, etc. Not a degrading position of "paid servant." None of us. The King trusts his team to make decisions on his behalf, etc. I am not sure that being servant is the main mission of our team. Yes we are servants to the citizens of CIG from 9:00 am to 5:00 pm. We are there to take care of business for the citizens." (Exhibit K); "I am a public servant 9:00 - 5:00 pm, my working hours and whenever my work require that I work late. I have the same right of any citizen of CIG. That is for Tim Elder, Gregg Noll and myself." (Exhibit L).

62. Defendant also contends that it is the Pastor's (i.e. the King's) and Inspector General's role - not a citizen's role - to "correct" a public official (Exhibit K), failing to recognize the right of CIG citizens to confront public officials and to seek redress of grievances, which is a human right<sup>28</sup>, as stated by the King (paragraph 16).

## **F. Defendant's Personal Communications as a Public Official to Other CIG Citizens**

63. Defendant wrote to another GIC citizen (2<sup>nd</sup> generation) and volunteer via FB direct message with emphasis on her position: "I find this incredible that you guys continue to persecute someone [i.e. Defendant] unjustly. Jamal and Robert I can understand they are capable of doing so but you and others in that list?" (Exhibit L).

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<sup>28</sup> Principle II, Right I of CIG Constitution ("the right of people to petition the Government for a redress of grievances")

64. Defendant wrote to yet another CIG citizen (in Europe) and volunteer leader via FB direct message: “Jamal has a very big mouth. He has no reason for mistreating me” when Defendant was communicating with the person from the position of the secretary to the World Mission. (Exhibit M)

65. Defendant’s such communications constitute a public official’s gossiping about a particular individual citizen in Defendant’s official capacity.

### **G. Defendant’s Abusing the Public Position to Manage a Church Project**

66. In a Church Committee meeting on April 18<sup>th</sup>, 2017 attended by several members of the Sanctuary Church staff and citizen volunteers, the Pastor stated that certain questions raised by Plaintiff at the meeting were not personal attacks upon the defendant but legitimate questions.

67. On the next day, Defendant sent a group email titled “To Jamal ... with love!” from the official work email, citing the April 18th meeting as being the cause for the email. This email chain involved several members of the church committee, including the Administrator of “the Church,” and spanned from April 19 to April 24, 2017. (Exhibit N)

68. In this chain of emails Defendant stated, with respect to a so-called “OSDP committee”<sup>29</sup> or team (“Church project”) for which Defendant voluntarily took initiative, “Everyone is welcome to present a [sic] feedback and to join us. The only exception we are making is for those that do not trust each other or speak ill of our committee members, either online or in person. That is not acceptable.” (Exhibit N).

69. Defendant’s statement above indicates that Defendant would refuse anybody who “speaks ill of” Defendant either online or in person to join or give feedback. As “speaking ill of” someone can be defined generally and subjectively, Defendant is claiming that she has authority and power to chose who can join or give feedback depending on whether the person

---

<sup>29</sup> Defendant, after a number of Sanctuary supporters had resigned from the “committee” and one Sanctuary supporter was barred from participation, also referred to this “committee,” around March 2017 with a newly invented name “The Kingdom Gospel DP Education Committee.” She referred, in a slide presentation, to this theological committee which she has stated she initiated and to which she contributes her theological views, when lecturing in public in a video broadcast worldwide in a workshop which dealt with theological matters such as “Crownings,” on March 27, 2017, on the official Church public YouTube TV channel. These facts are in contradiction with her statements in Exhibit I: “I hardly express my opinion in public” and “I am not a theologian.”

“speaks ill of” her or not, regardless of the person’s ability or qualification, or willingness to contribute the Church project, using her public position that enables her to manage or initiate such a Church project.

70. While Defendant, as the public official, is in a servant position to CIG citizens and thus should be a facilitator for a Church project in which sovereign CIG citizens participate, and serve for the purpose of the Church project, Defendant is trying to take a master’s position and privatize and even monopolize the Church project.<sup>30</sup>

71. Furthermore, in the chain of the email from the official work email, acting as a public official, Defendant used the group email (eight recipients, including the King and the Queen) as a forum for accusing and prosecuting Plaintiff, a private citizen, by demanding, “We have to address the issue of you disobeying the King’s instructions” (Exhibit O) without any factual support.

72. The action of Defendant stated in paragraph 71 constitutes Defendant’s acting as police and prosecutor against Plaintiff in a self-convened forum before the King using the public position.

73. In addition, as no evidence whatsoever was given by Defendant, this is a serious defamation by a public official against a CIG citizen using the public position and power.

74. Since Plaintiff was one of the earliest supporters who stood by the Second King, and has been faithful and loyal to the King, and also trusted by the King, Defendant’s defamatory language such as “disobeying the King” distributed by Defendant as a public official using the public position and power caused great pain in Plaintiff.

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<sup>30</sup> As mentioned above in paragraph 19, in managing the FB group “The UC and the Truth,” Defendant stated that “I would prefer to have only supporters and not criticals [sic] of me on my group...I should have the freedom do to [sic] what I want here on my site, correct?” She also wrote, “This is [m]y property, correct?” The Defendant also wrote, “It is my private group...”(Exhibit D), similarly privatizing “The UC and the Truth” FB group site as a Church project in nature.



## H. Defendant's Refusal to Support Principles of CIG Constitution

75. In the process of forming this Court after the King's initial appointment of the judge, two Court Orders were issued (Exhibit Q and Exhibit R). Plaintiff's case was initially dismissed, without prejudice, as the actual nation of USCIG does not exist and thus Plaintiff's standing (citizenship) and the court's personal jurisdiction may depend upon the establishment of future nations. However, in accordance with the King's desire to develop jurisprudence in the Sanctuary movement, Court Order 1 of July 26, 2017 allowed the case to continue if the parties notify the court "in a signed writing that they consider themselves Citizens of Cheon Il Guk." (emphasis added) Court Order 1 was also clear that "Any party failing to notify this court thereby declares that they are not a Citizen of Cheon Il Guk."

76. In order to resolve any confusion causes by Court Order 1, Court Order 2 of July 27, 2017 was issued, and the parties were required to fill out the form, sign, and return it by August 7, 2017. The Court Order 2 included the following statements: (i) I \_\_\_\_\_ (Printed Name) consider myself a Citizen of Cheon Il Guk, support the principles of The Constitution of the United States of Chen Il Guk, and agree to be bound by the decision of this Court. I reserve my right of appeal; (ii) I \_\_\_\_\_ (Printed Name) do not consider myself a Citizen of Cheon Il Guk, and do not support the principles of The Constitution of the United States of Chen Il Guk to the extent that I acknowledge its authority. (numbers added.)

77. Although Court Order 2 did not use the word "image" of CIG as the King mentioned, the language of the order: supporting "the principles of" (not the exact or literal) CIG Constitution meant that the parties can voluntarily abide by the principles of CIG Constitution in image of CIG.

78. Plaintiff promptly returned the form by signing the statement (i). However, Defendant failed to comply with Court Order 2 and did not return the form by the due date, whereby the initial case was dismissed.

79. Defendant effectively declared, as noted in Court Order 1, that Defendant was not a Citizen of Cheon Il Guk.

80. Defendant also refused to consider herself a Citizen of Cheon Il Guk, refused to support the principles of the CIG Constitution, and refused to agree to be bound by the decision of the court by failing to submit the form.

81. At the same time, Defendant also refused to admit that she did not consider herself a Citizen of Cheon Il Guk and that she would not support the principles of the CIG Constitution, by failing to submit the form.

82. Defendant also demonstrated that she did not respect the King's appointment of the judge and that she did not recognize the court's authority by not complying with Court Order 2.

83. Despite the fact that Defendant has said: "I am a church public official and an extension of the Kingdom.... We are here to inspire people to come to accept the King." (Exhibit B); "... you, Citizens of CIG." (Exhibit I); "Public servants also are free citizens of CIG." (Exhibit K); "I am blessed and the Queen of our Family.... I have the same right of any citizen of CIG." (Exhibit L); "I am given freedom to perform well for my 'owners' the citizens of CIG. That's an incredible blessing." (Exhibit P), Defendant refused to consider herself a citizen of CIG when required by the Court so as not to support the principles of CIG Constitution.

**AS AND FOR A FIRST CAUSE OF ACTION**  
**CIG Constitution, Article III, Section 8, Clause 25**  
**("Harassment and Abuse by Bureaucracies" clause)**

84. Paragraphs 43- 45, 49-59, and 63-74 above are hereby realleged and incorporated by reference as though fully restated herein.

85. Defendant's series of actions in the color of public official on online communities and in personal communications repeatedly attacked Plaintiff, taking advantage of opportunities and privileges which were only available to such a public official, constituting harassment to Plaintiff.

86. Defendant also abused her power and apparent authority to solicit the community and individuals to attack, correct, or otherwise change Plaintiffs behavior in concert with Defendant.

87. Accordingly, Defendant violated the principles of the Article III, Section 8, Clause 25 (“Harassment and Abuse by Bureaucracies” clause) of CIG Constitution, which requires that citizens of CIG be protected from being harassed or abused by government bureaucracies.

### **AS AND FOR A SECOND CAUSE OF ACTION**

#### **Article III, Section 9, Clause 16 (“Acknowledgement of the Principle of the Sovereign Citizen”)**

88. Paragraphs 16, 60-65, and 66-74 above are hereby realleged and incorporated by reference as though fully restated herein.

89. Defendant, failing to understand the proper position as a servant in relation to CIG citizens while being in a public person and claiming herself as “an official representative of the church and an extension of the Kingdom,” Defendant acted as a master or controller of Plaintiff as shown in Defendant series of actions against Plaintiff. This exhibits Defendant’s complete failure to agree with and acknowledge the principle of the sovereign citizen as required by Article III, Section 9, Clause 16 of CIG Constitution.

### **AS AND FOR A THIRD CAUSE OF ACTION**

#### **Article IV, Section 2, Clause 5 (“Clandestine Acts of Terror against the CIG Citizens with the Intent of Molding Public Opinion”)**

90. Paragraphs 49-59 above are hereby realleged and incorporated by reference as though fully restated herein.

91. Defendants used her public position and power to conduct various manipulation of information, including false statements, with the intent to invoke a negative image of Plaintiff and form a public opinion against Plaintiff in the worldwide online community and the local community such that people act against Plaintiff to change Plaintiff’s behavior, constituting a violation of Article IV, Section 2, Clause 5 of CIG Constitution (“Clandestine Acts of Terror against the CIG Citizens with the Intent of Molding Public Opinion”).

**AS AND FOR A FOURTH CAUSE OF ACTION**

**Article VI, Section 1  
("Oath/Affirmation to Support CIG Constitution")**

92. Paragraphs 75-83 above are hereby realleged and incorporated by reference as though fully restated herein.

93. Defendants refused to consider herself a Citizen of CIG so as not to support the principles of CIG Constitution in order to avoid accountability and dismiss the case, in violation of Article VI, Section 1 of CIG Constitution (Oath/Affirmation to support CIG Constitution), the principle of which requires that public officials shall be bound by oath or affirmation to support [the principles of] CIG constitution.

**PRAYERS FOR RELIEF**

WHEREFORE, Plaintiff prays that this Court judgment against Defendant as follows:

(a) under the First Cause of Action, declaring that Defendant violated the rights of Plaintiff to be free from public official's harassment and abuse under the principles of CIG Constitution, Article III, Section 8, Clause 25.

(b) under the Second Cause of Action, declaring that Defendant failed to agree with and acknowledge the principle of sovereign citizen in violation of the principles of CIG Constitution, Article III, Section 9, Clause 16.

(c) under the Third Cause of Action, declaring that Defendant manipulated information and people in order to form a negative public opinion against Plaintiff in violation of the principles of CIG Constitution, Article IV, Section 2, Clause 5.

(d) under the Fourth Cause of Action, declaring that Defendant refused to consider herself as a Citizen of CIG and to support the principles of CIG Constitution, in violation of the principles of CIG Constitution, Article VI, Section 1.

(e) under the First Cause of Action, ordering Defendant to make a public statement on “The UC and the Truth” and other FB groups, and the Church website that Defendant violated Plaintiff’s right to be protected from harassment and abuse by a public official, to stop harassing Plaintiff by abusing the public position and power, and to make an apology to Plaintiff in a manner acceptable to Plaintiff.

(f) under the Second Cause of Action, ordering Defendant to make a public statement on “The UC and the Truth” and other FB groups, and the Church website that Defendant failed to acknowledge Plaintiff’s right as a sovereign citizen of CIG in image, and to make a promise to stay in a proper position of a servant to CIG citizens and to make an apology to Plaintiff in a manner acceptable to Plaintiff.

(g) under the Third Cause of Action, ordering Defendant to make a public statement on “The UC and the Truth” and other FB groups, and the Church website that Defendant manipulated information and people so as to form a negative opinion against Plaintiff, to stop manipulative activities, and to make an apology to Plaintiff in a manner acceptable to Plaintiff.

(h) under the Fourth Cause of Action, ordering Defendant to make a public statement on “The UC and the Truth” and other FB groups, and the Church website that Defendant refused to consider herself a Citizen of Cheon Il Guk, and refused to support the principles of CIG in violation of the principles of CIG Constitution, and to make an oath or affirmation that Defendant supports the principles of CIG Constitution.

(i) alternatively and only if Defendant refuses to make such statements as requested above, ordering Defendant to be dismissed from the current position as lack of accountability as a public official, failure to consider herself a citizen of CIG in image, and/or refusal to support the principles of CIG Constitution in image.

(j) under the First, Second, Third, and/or Fourth Cause of Actions, issuing any necessary disciplinary action against Defendant.


(k) under the First, Second, Third, and/or Fourth Cause of Actions, ordering Defendant to produce and submit further information<sup>31</sup> including email and Facebook messenger correspondences sent to a third party or parties containing accusations against Plaintiff.

(l) conducting further investigation against Defendant such that any violation of the sovereign right of others similarly situated are properly redressed and a proper measure to protect the sovereign citizen's right is implemented.

(m) clarifying, by a public notice, the boundary and areas of Defendant's official responsibilities such that it is clearly understood and seen if an action of the public officer is outside of the official responsibilities.

Dated: Newfoundland, Pennsylvania

August 29, 2017

A handwritten signature in black ink, appearing to read 'Jamal Johnson', written over a horizontal line.

15 Lions Street  
East Stroudsburg, PA 18301

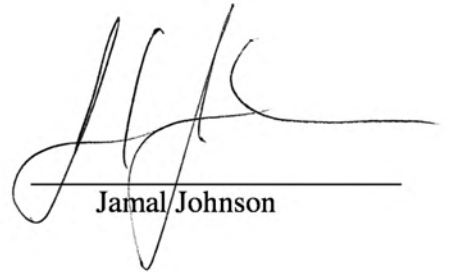
(Prepared by Masako Ando on behalf of Plaintiff)

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<sup>31</sup> See Exhibit H as Defendant admits that she is an open book.

## VERIFICATION

I, Jamal Johnson, hereby verify that I am the Plaintiff in this action and that I have knowledge of the facts set forth in the foregoing Complaint. I further verify that the facts set forth in the foregoing Complaint are true and accurate to the best of my knowledge, information and belief.



\_\_\_\_\_

Jamal Johnson

Dated: August 29, 2017

## Exhibit A

To Jamal ... with love!

Inbox x




**Lourdes Swarts** <lourdes@sanctuary-pa.org>

Apr 19 ☆



to me,

 You blocked lourdes@sanctuary-pa.org. Messages from this address will be marked as Spam. [Learn more](#)

Dearest brother Jamal,

I wanted to take a few minutes and respond to your concerns expressed yesterday, with some background.

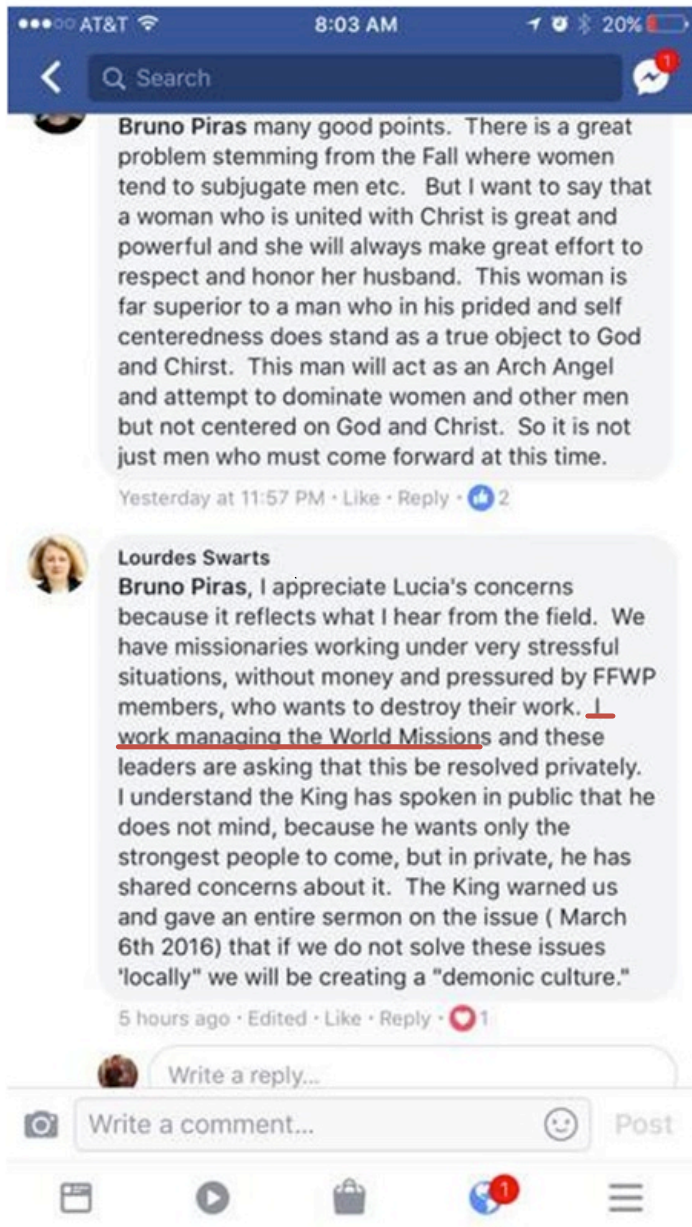
When we started our church here in NF, I often spent a great deal of time seating with the King and KJN at our roundtable, after the services. In several occasions Kook Jin Nim addressed us and in a couple of instances, Kerry and I, in regards to the need to teach the DP and when the church in Korea started programs to teach the word of God, only than, the church started to grow.

I took it that to the heart. I spoke with Kerry and we started to work on creating a team. The original team included some of the major leaders from around the world that also wanted to teach an updated version of the DP. Kerry and I discussed and we decided to create a local group to make things happen faster.

I am part of the World Missions and speak with our SC representatives from around the world in a regular basis. I am the Secretary to the World Missions and work on communication and development.



## Exhibit B



You can write me in private but you chose to go public by doing so your are hurting our church. I am a church public official and an extension of the Kingdom. I do not see the need for this. We are here to inspire people to come to accept the King. This is my witnessing site please respect that I sincerely ask. Thanks!

## Exhibit C



Lisa Zanin  
Facebook

/16



Lisa Zanin

219 mutual friends including Mark Alexander and Birgit Poljakov  
Lives in Scranton, Pennsylvania

/16

12/07/2014 6:09AM



Jamal, could you please friend me. i use the name Lisa Zanin because of my business. Lourdes

/15

02/09/2015 12:40PM

/15



Thank Jamal. Please help us as a moderator. I told Robert Pickell to lay low. We want a good, smart give and take. Also, I am working to reach 3,000... Help me please!

/15

## Exhibit D



Frankly, I would prefer to have only supporters and not criticals of me on my group. I feel strongly that negative, confrontational comments are not good for our King and our church. I am an official representative of the church and negativity related to my name affects our work. IMO, that is not acceptable.

I should have the freedom do to what I want here on my site, correct? This is y property, correct?



Seriously sister. Insulting the host is not a good thing.



You can write me in private but you chose to go public by doing so your are hurting our church. I am a church public official and an extension of the Kingdom. I do not see the need for this. We are here to inspire people to come to accept the King. This is my witnessing site please respect that I sincerely ask. Thanks!



🔒 Lourdes Swarts Msako Ando, Robert Pickell and Jamal Johnson do not post regularly. in our Uc and the Truth site. They came to the site want the only one intent to disrupt the site. They posted irrational accusations that are unproven, disrespectful to our faith community and damaging to our work. BTW, that is a violation of our site's rules and I did not allow her to post. It is my private group Masako Ando. Please respect that.

Like · Reply · January 12 at 10:30pm

## Exhibit E

I should do the same. The reason why I do not stop is because the King blessed my ministry as a outreach ministry. Out of this site we have been building the World Mission Depart.

This is not a joke.

for me.

## Exhibit F





Frankly, I would prefer to have only supporters and not criticals of me on my group. I feel strongly that negative, confrontational comments are not good for our King and our church. I am an official representative of the church and negativity related to my name affects our work. IMO, that is not acceptable.



You can write me in private but you chose to go public by doing so your are hurting our church. I am a church public official and an extension of the Kingdom. I do not see the need for this. We are here to inspire people to come to accept the King. This is my witnessing site please respect that I sincerely ask. Thanks!


## Exhibit G

 **Lourdes Swarts** There is so much positive going on here. It will take all day to list them. I feel the more people come forth and speak up the faster the two brothers will change. It is imperative that we give them to freedom to speak their mind. The freedom of speech is a special gift of the citizens of CIG. Look, come today and see what our community is doing. If money is an issue, please see me [Scott O'Brien](#). We want all to come and witness the incredible work and the level of growth that is taken place. The sad thing is that these things do not get any "media" coverage. Only the negative.

Like · Reply ·  2 · 15 hrs

Saturday, May 27, 2017 at 7:04am

**The UC and the Truth, because only the truth will set us free**

 Secret Group


**Discussion**


Members


Events

Videos


Photos

 **Rodrigues Pedro** The kingdom of heaven described by Jesus, is not supposed to have contradiction on the direction to go, if there's some, it's mean that it's not the kingdom of heaven yet!!! The decision made by (True mother), left the whole movimente upside down, the... [See More](#)

Like · Reply ·  1 · May 24 at 8:34pm

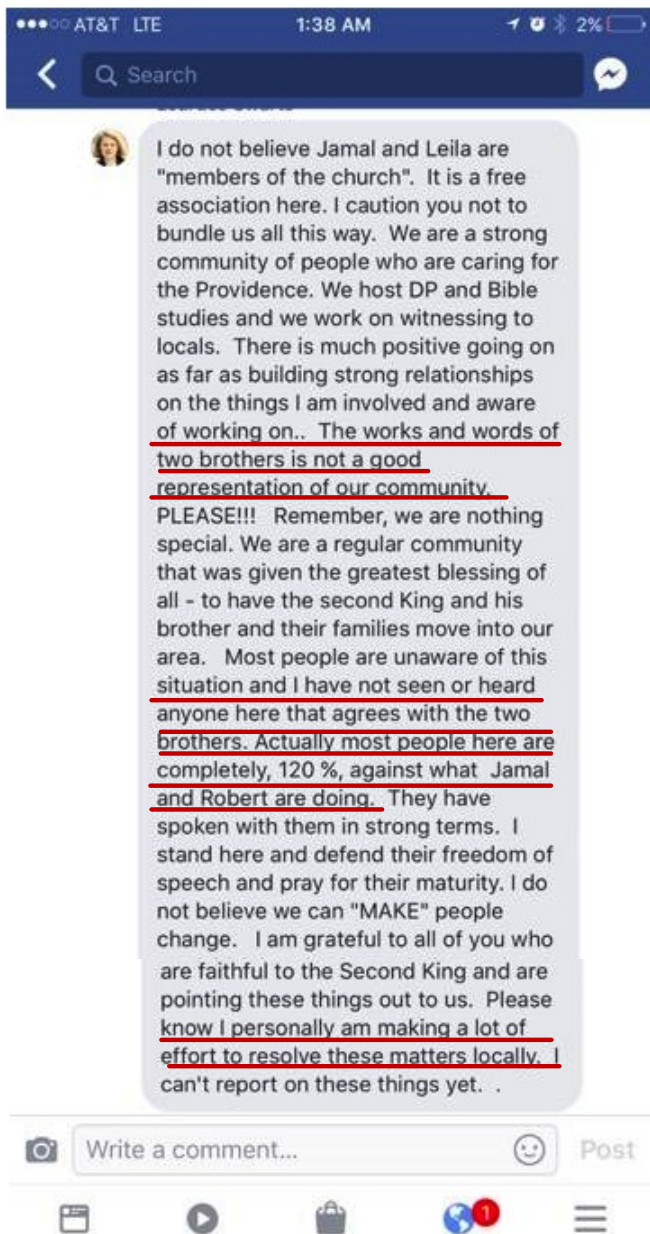
 **Karen RockyKeats Noble** Interesting point. [Yesenia Pena](#) and [Ivan Janer I](#) have found that Sunday chat is run by Jamal (no wrench) but intimidating force and a 2nd Gen who calls him Uncle Jamal on chat and UC and the Truth does not allow Jamal here. So our welcome chat is a clique of thug run political correctness. Go figure. Such great leadership in our SC church

Like · Reply · 19 hrs

 **Lourdes Swarts** "Reputation is very importante in CIG", [Tim Elder](#), the Kings Report today, a few minutes ago. For that reason, let me say, Jamal has the freedom of speech to say whatever he wishes-- to cause harm, to attack, to bully, he is free. The community needs to stand up and make a correction. The King will not do so.

Like · Reply · 18 hrs

## Exhibit H



## Exhibit I



Lourdes Swarts

14 hrs

A great big THANK YOU for helping achieve the goal of 1000 plus signatures for the Cheon Il Guk trademark Petition. One thousand plus people have signed this is indeed great effort by you, Citizens of CIG. Thank you. Let's offer all glory and praise to our Heavenly Father, True Father and our beloved King!

On another matter, a great number of people ask me, why don't you defend yourself against some folks that continually speaks ill of you online. They are defaming your character and speaks on a demeaning way. I want to simply say, my heart is one of total commitment to God and the Living Christ and His representative here on the earth, the King and Queen of CIG.

They, after evaluating my character and devotion for over one entire year contacted me and asked me to serve as their staff. I am tremendously grateful for the opportunity offered me. Tim Elder mentioned told me then: "look Kook Jin Nim transform people's lives when they come to work for him (KJN and HJN are ONE) and your life will never be the same." I can attest to that because my experience working here, my life has changed forever.

In many ways I am a person of few words. You do not see me speaking or even hardly I express my opinion in public.

God is working in my life powerfully and True Father's teachings have come alive to me, via the Second King.

I just wanted to take a few moments and let you know that above all, I am grateful for everything that comes my way.

My role at church is to organize events and help develop the WORLD MISSIONS, under Tim Elder. I am not a Theologian and never played one on TV. My role is a supporting role and I will do all I can do bring maximum return to God for investing in me.

Please have patience with us as we move towards resolving our issues here internally. God is in control of everything. I truly believe that.

With much love and gratitude, Lourdes Swarts



## Exhibit J



**Lourdes Swarts** Joy you are right. Lately some folks have gone wild here. We are giving them some time because the attacks were against me. So I wanted to be fair. That is from my perspective as the founder. As far as our administrators, they can speak for themselves.

Like · Reply · 23 hrs · Edited



**Ivan Janer** I'm sorry to tell you Lourdes; but the attacks were not against you alone and I have copies of such attacks made to others women and attacks made to me personally to prove it. Yes it was a long drawn out attack on your personally mentioning your name over and over and over again. But he then attacked others as well mentioning their names as well, and I have proof which you are well aware of.

Like · Reply · 12 hrs



**Ivan Janer** If you'd like me to post some comments with the exact quote and names mentioned I will be more than glad to accomodate you with those,

Like · Reply · 12 hrs



**Ivan Janer** Oh...Sorry...I forgot to mention. This person also attacked head on another man on UC and The Church. Would you like me to refresh your mind as to who that other man is? Never forget, Lourdes a man who verbally attack ONE WOMAN, never verbally attack ONE WOMAN. An abusive Verbally degrading human being get off attacking others until someone puts him in his place.

Like · Reply · 11 hrs



**Lourdes Swarts** Kindly send it to me via email please. the King wanted to see a summary of these posts.

Like · Reply · 1 hr



**Ivan Janer** I will prepare it for you in the morning and email them to you.

Like · Reply · 1 hr

## Exhibit K



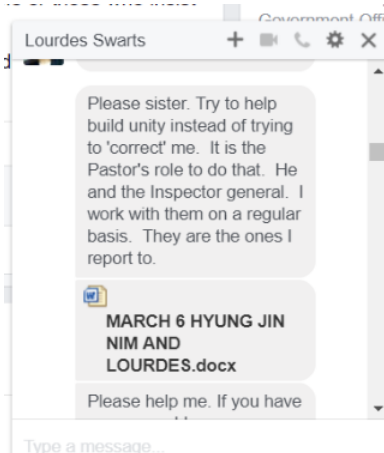
**Timothy Elder** Members of the King's staff are servants to Blessed Central Families who are in True Father's authority.

Like · Reply · 6 · June 3 at 11:20am



**Lourdes Swarts** Very good point Kevin. Another issue to consider is that the public servants have a system of checks and balances. Public servants also are free citizens of CIG. We are public servants during business hours, for instance. We have freedom to pursue our dreams, take care of our families, ministries and are also Kings and Queens of CIG. Tim Elder or Gregg Noll are also King of their respective families.

Like · Reply · 1 · 8 mins · Edited



I see the servants position working on the 'government" different that what you describe. I went to KJN and asked him what are the rights of the servants of God . I am praying about it. Tim Elder is first King of the Elder family, he serves as diretor of the World Missions second. I do not see the King relating to him as his "servant". He is a counselor, and advisor, etc. Not a degrading position of 'paid servant." None of us. The King trusts his team to make decisions on his behalf, etc.

I am not so sure that being servant is the main mission of our team. Yes we are servants to the citizens of CIG from 9:00 am to 5:00 pm. We are there to take care of business for the citizens.

## Exhibit L

Was I taken off the list [redacted]? I find this incredible that you guys continue to persecute someone unjustly. Jamal and Robert I can understand they are capable of doing so but you and others in that list?

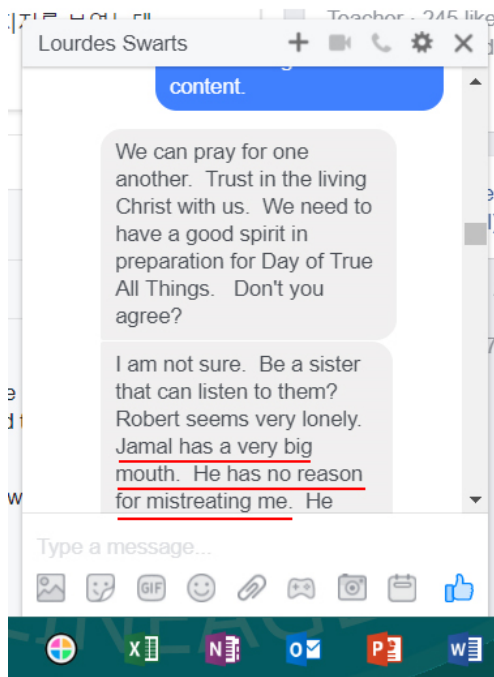
Frankly, this is beyond sad. I hope you would want find the real truth.

FYI- I am blessed and the Queen of our Family. I am a public servant 9:00 - 5:00 pm, my working hours and whenever my work require that I work late. I have the same right of any citizen of CIG. That is for Tim Elder, Gregg Noll and myself.

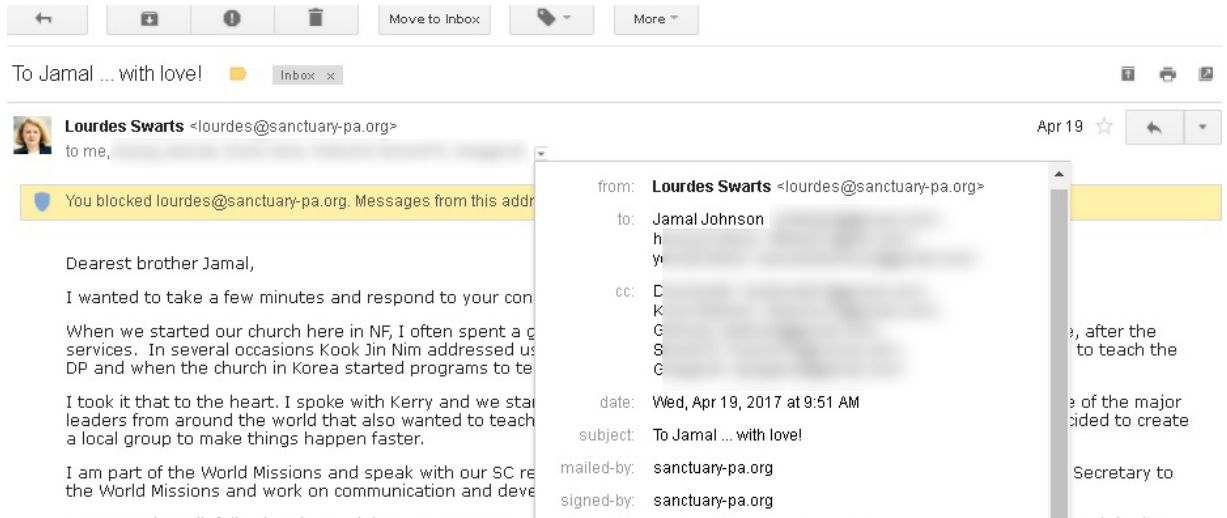
What list are you talking about?

I'm so confused

## Exhibit M



# Exhibit N



I will be happy to discuss this matter further with you. Rest assured no one is excluding anyone or neither wants to monopolize the very serious matters that is to witness and to share THE WORD OF GOD. That would be equivalent to shooting yourself on the foot!

At this point and time, there are 3 main workers here at church. I asked Tim and Gregg and neither of them wanted to be part of it as far as teaching or developing materials. They are focused individuals and have a great deal of responsibility in their hands.

I took the initiative because that is the person that I am. I personally have a passion for the ministry. I spent too much time of my life doing external things that has brought too little to God. I want to spend the rest of my life teaching the Divine Principle and supporting God.

I am truly blessed to be working with amazing brothers and sisters here at SC. Everyone is welcome to present a feedback and to join us.

The only exception we are making is for those that do not trust each other or speak ill of our committee members, either online or in person. That is not acceptable.

I appreciate your comments and am praying for your success. You have the future of our children in your hands. My son will soon be joining SC and I want to ask for your prayers for him and for your support of my ministry as well. That is a win win win for our Heavenly Father and the King.

God bless you. I sincerely hope we can work together in unity in building God's kingdom.

Sincerely,

Lourdes

## Exhibit O



**Lourdes Swarts** <lourdes@sanctuary-pa.org>

to me, [View all messages from Lourdes Swarts](#)

Apr 24



You blocked lourdes@sanctuary-pa.org. Messages from this address will be marked as Spam. [Learn more](#)

Jamal,

Here are the five issues that needs to be discussed:

1. Who are the "specific" people who are asking for changes?
2. What are the "specific" changes these people want?
3. We have to address the issue of you disobeying the King's instructions.
4. We have to address your false accusations.
5. We have to address the issue of you going public with your accusations.

Lourdes



## Exhibit P

...



**Lourdes Swarts** <lourdes@sanctuary-pa.org>

Apr 19 ☆



to me, [redacted]

You blocked lourdes@sanctuary-pa.org. Messages from this address will be marked as Spam. [Learn more](#)

Thanks Jamal.

I appreciate your feedback. We agree on everything here that you say on your FIRST list. We see these things eye to eye Jamal.

I try my best to do the things assigned to me with a humble heart and gratitude. I know I need to grow everyday and I am given freedom to perform well for my "owners" the citizens of CIG. That is an incredible blessing.

I would like to see what you recommend I do, from your perspective. I am open for your suggestions. How do you define my mission? What do you understand my mission to be? How do I correct myself.

I work for the public and therefore I am an open book.

I am grateful for your time and feedback.

...



**Jamal Johnson** [redacted]

Apr 19 ☆



to [redacted]

**EXHIBIT Q**

**COURT OF THE UNITED STATES OF CHEON IL GUK  
CIVIL DIVISION**

_____	)
<b>JAMAL JOHNSON</b>	)
	)
<i>Plaintiff,</i>	)
	)
<b>v.</b>	)
	)
<b>LOURDES SWARTS</b>	)
	)
<i>Defendant.</i>	)
_____	)

**Case No. 2017 PA 0721-1**

**Judge James A. Borer**

**ORDER**

This matter is before the Court on Plaintiff's Complaint.

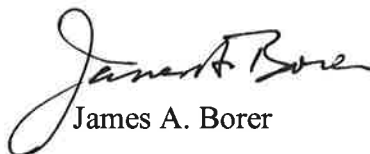
Pursuant to the Constitution of the United States of Cheon Il Guk (CIG Constitution), First, Second, and Third Causes of Action (Counts) should be dismissed because Plaintiff lacks standing to assert the claims alleged in those Counts. Plaintiff is not a sovereign citizen of a nation state governed by the United States of Cheon Il Guk.

Further, Plaintiff fails to demonstrate that this Court can exercise personal jurisdiction over the parties. All Counts should be dismissed as the Court likewise, as set out in the Preamble of the CIG Constitution, depends upon the establishment of future nations for its authority.

Accordingly, it is this 26th day of July 2017, hereby:

**ORDERED** that Plaintiff's Complaint is **DISMISSED** without prejudice unless and until all parties notify this Court in a signed writing that they consider themselves Citizens of Cheon Il Guk. Any party failing to notify this court thereby declares that they are not a Citizen of Cheon Il Guk. This **ORDER** will become **FINAL** if signed writings are not received on or before August 7, 2017.

**SO ORDERED.**



James A. Borer



**EXHIBIT R**

**COURT OF THE UNITED STATES OF CHEON IL GUK  
CIVIL DIVISION**

\_\_\_\_\_  
**JAMAL JOHNSON**  
*Plaintiff,*  
  
*v.*  
**LOURDES SWARTS**  
*Defendant.*  
\_\_\_\_\_

**Case No. 2017 PA 0721-1**  
**Judge James A. Borer**

**ORDER**

This matter is before the Court on Plaintiff's Complaint. This form is to be returned to the Court prior to Defendant's Answer to Complaint, and Defendant's Counterclaim if there is one. All leniencies will be given to the form of filings. It appears the parties are litigating *pro-se*, i.e. without attorney, and have become confused by the Court's Order. In order to resolve any confusion, the Court now requires the parties to fill out this form and return it to the Court on or before the date below.

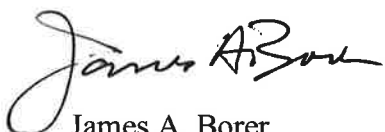
I \_\_\_\_\_ (Printed Name) consider myself a Citizen of Cheon Il Guk, support the principles of The Constitution of the United States of Cheon Il Guk, and agree to be bound by the decision of this Court. I reserve my right of appeal.  
\_\_\_\_\_  
(Signature)

I \_\_\_\_\_ (Printed Name) do not consider myself a Citizen of Cheon Il Guk, and do not support the principles of The Constitution of the United States of Cheon Il Guk to the extent that I acknowledge its authority.  
\_\_\_\_\_  
(Signature)

It is this 27th day of July 2017, hereby:

**ORDERED** that Plaintiff and Defendant each complete this form and return it to the Court on or before August 7, 2017.

**SO ORDERED.**

  
James A. Borer