
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Case No. 07-40098 FDS

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

AFFIDAVIT OF MOLLIE STEENSON

STATE OF ILLINOIS)
)
FRANKLIN, ss.)

Mollie Steenson, being first duly sworn upon oath, deposes and states as follows:

1. I am the General Manager and the elected Secretary of the Corporation and of the Board of Directors of the non-profit corporation 3 Angels Broadcasting Network (“3ABN”), duly organized in the state of Illinois. I have worked in the employ of 3ABN since 1995. Through the duration of my tenure, I have worked as an assistant to Linda Shelton, an assistant to Danny Shelton and now have the position of General Manager. My duties as General Manager include monitoring and managing the day-to-day operations of 3ABN, acting as the human resources department, staying apprised of the general financial condition of 3ABN, acting as the corporate spokesperson and all of the duties as Secretary as described in the bylaws below.

2. The duties of the Secretary for the Corporation and for the Board of Directors, as defined in the revised bylaws signed on September 14, 1997, are:

Section 5.6. Duties of the Secretary. The secretary shall act as secretary of the corporation and the Board of Directors, shall send appropriate notices or waivers of notice regarding board meetings, shall prepare agendas and other materials for all meetings of the Board of Directors, shall act as official custodian of all records, reports and minutes of the corporation, the Board of Directors and committees, shall be responsible for the keeping and reporting of adequate records of all meetings of the Board of Directors, and shall perform such other duties as are customarily performed by or required of corporate secretaries including countersigning all papers, including promissory notes of the Corporation in writing that may require the same.

3. At Board Meetings, I review the financial statements prepared by Chief Financial Officer Larry Ewing. These financial statements contain an analysis of 3ABN's current financial status, including donations, other revenue and expenditures.

4. Based on correspondence from donors and from financial statements prepared by Larry Ewing, it is clear that donations to 3ABN have decreased substantially since June 2006, when the Internet commentary disparaging 3ABN and Danny Shelton erupted on various sites on the Internet. Contributions have continued their decline during the first quarter of 2007, coinciding with Defendant Joy's operation of his website devoted solely to defaming Plaintiffs at www.save3ABN.com. In fact, Defendant Joy stated in a post at www.maritime.com sometime on or around November 20, 2006, that “[i]f [the attempt to resolve the matter before ASI, a religious tribunal] does not work out, then in January, 2007 we will launch a full scale and public effort to exonerate Linda, to indict Danny in the public eye and to put pressure on 3ABN . . .” See <http://www.blacksda.com/forums/index.php?s=792dcc3c96a3269a06da5ef966fe4cb2&showtopic=11142&st=105&p=158721&#entry158721>.

5. I have received communications from past donors that state that those donors are no longer donating to 3ABN specifically because of the disparaging statements about 3ABN and Danny Shelton on the Internet. Based upon the rumors spread across the Internet on www.save3ABN.com and other sites, these donors have been led to believe that 3ABN is no longer a reputable institution and that Danny Shelton should be removed from his position at 3ABN. See Attachments A-F.

6. A letter published on Adventist Today¹ on May 1, 2007, directly cites to www.savc3ABN.org (which directs the user to www.save3ABN.com) as its source for some information. This letter charges 3ABN with various alleged wrongdoings and concludes by making it known that the writer has stopped all financial support of 3ABN. According to the letter, many other donors also made this decision to stop financial support of 3ABN for the same reasons as the writer. See Attachment G.

7. The letter published on Adventist Today on May 1, 2007, also alleges that Danny Shelton has committed many possible wrongdoings, committed questionable acts, jeopardized the charitable standing of the ministry, used donations for personal benefit and possibly committed adultery. See Attachment G.

8. 3ABN received a copy of the letter published on May 1, 2007, on Adventist Today through one of its supporters. That supporter stated that in the future, she would be withholding donations from 3ABN because of the allegations that are being spread across the Internet, which had, in her opinion, placed 3ABN and Danny Shelton in a negative stance in the public eye. See Attachment H. I have received similar

¹ Adventist Today (ISSN 1079-5499) is a bimonthly magazine publication of the Adventist Today Foundation that "reports on contemporary issues of importance to Adventist church members." As a companion to its printed publication, Adventist Today operates an internet website at www.atoday.com, and regularly publishes an electronic newsletter called "ATNewsbreak," which it distributes via e-mail.

correspondence from other supporters and donors that express this same belief that, as reported on www.save3ABN.com and other websites, 3ABN and Danny Shelton have done improper things. Because of these beliefs, these donors now withhold support and donations from 3ABN. See Attachments A-F.

9. The website www.save3ABN.com also has contributed to a loss of fundraising ability and 3ABN's ability to spread the Christian message in the South Pacific. The General Conference of the South Pacific Division of the Seventh-day Adventist Church has passed a moratorium that prohibits any interaction with 3ABN. In effect, this moratorium prevents 3ABN from sending speakers to churches located in Australia, New Zealand, and the South Pacific. It also prohibits any church employees in that region from creating programming for 3ABN. This moratorium acts as a general bar to any interaction between 3ABN and Seventh-day Adventist Churches in Australia, New Zealand and the South Pacific. Based on my knowledge and belief, the allegations posted on www.save3ABN.com and other websites are what prompted the South Pacific Conference to enact this moratorium against 3ABN. See Attachment J.

10. In January 2007, postcards advertising www.save3ABN.com were sent to Seventh-day Adventist Churches. From all indications, the postcards were mailed to Seventh-day Adventist Churches across the world. The postcards request recipients to view www.save3ABN.com. The postcards also state, "It should be pointed out that 3ABN is not currently part of the Seventh-day Adventist Church, and never has been." The postcards do not contain any disclaimer to signify that 3ABN is not related with www.save3ABN.com in any way. In fact, the postcards imply that 3ABN is associated with www.save3ABN.com. See Attachment K.

11. I have been forwarded correspondence from a 3ABN supporter who e-mailed www.save3ABN.com to verify whether the website was connected to 3ABN. See Attachment I.

12. The website www.save3ABN.com has previously posted letters and other correspondence on its website. However, many times only select portions of the documents are posted, misleading readers into believing the documents stand for propositions other than what the authors intended. Even when whole documents are posted, comments are inserted throughout effectively directing readers to draw inaccurate and defamatory conclusions from the documents. If Defendants are not prohibited from publishing the legal documents filed and/or served in this proceeding on www.save3ABN.com or otherwise, then the Defendants will undoubtedly publish them along with defamatory commentary and conclusions, thereby utilizing this litigation as a vehicle to further tarnish the reputations of 3ABN and Danny Shelton and to hinder 3ABN's ability to fundraise and conduct its ministry.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: May 9, 2007

Mollie Steenson
Mollie Steenson,
General Manager and Secretary for
3ABN, Inc.

Subscribed and sworn to me
this 9 day of May, 2007.

Lynda E. Welch
Notary Public

