

ST PAUL MN 551



Grants Pass Seventh Day Adventist Church 1360 NE 9TH ST GRANTS PASS OR 97526-1324

fort of postical

ack of postcaro

## Please visit

# www.Save3ABN.com

It should be pointed out that 3ABN is not currently part of the Seventh-day Adventist Church, and never has been.

Thank you.

### 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. <u>Duties of the Secretary</u>. 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.
- 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 <a href="https://www.save3ABN.com">www.save3ABN.com</a>. In fact, Defendant Joy stated in a post at <a href="https://www.maritime.com">www.maritime.com</a> sometime on our 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...." <a href="mailto:See">See</a> <a href="http://www.blacksda.com/forums/index.php?s=792dcc3c96a3269a06da5ef966fe4cb2&showtopic=11142&st=105&p=158721&#entry158721">www.blacksda.com/forums/index.php?s=792dcc3c96a3269a06da5ef966fe4cb2&showtopic=11142&st=105&p=158721&#entry158721</a>.

- 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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. <a href="See Attachments A-F">See Attachments A-F</a>.
- 6. A letter published on Adventist Today¹ on May 1, 2007, directly cites to <a href="https://www.save3ABN.org">www.save3ABN.org</a> (which directs the user to <a href="https://www.save3ABN.com">www.save3ABN.com</a>) 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 if 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

3

<sup>&</sup>lt;sup>1</sup> 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a>. 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 <a href="www.save3ABN.com">www.save3ABN.com</a> in any way. In fact, the postcards imply that 3ABN is associated with <a href="www.save3ABN.com">www.save3ABN.com</a>. See Attachment K.

correspondence from other supporters and donors that express this same belief that, as reported on <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a> 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 my knowledge and belief, the allegations posted on <a href="www.save3ABN.com">www.save3ABN.com</a> and other websites are what prompted the South Pacific Conference to enact this moratorium against 3ABN. <a href="See">See</a> Attachment J.
- 10. In January 2007, postcards advertising <a href="www.save3ABN.com">www.save3ABN.com</a> 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 <a href="www.save3ABN.com">www.save3ABN.com</a>. 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 <a href="www.save3ABN.com">www.save3ABN.com</a> in any way. In fact, the postcards imply that 3ABN is associated with <a href="www.save3ABN.com">www.save3ABN.com</a>. See Attachment K.

4

Page 9 of 19

- 11. I have been forwarded correspondence from a 3ABN supporter who emailed 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

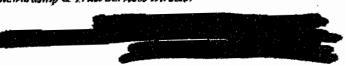
General Manager and Secretary for 3ABN, Inc.

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

"Official Seal" LYNDA E. WELCH Notary Public, State of Illinois My Commission Expires 5/2/2010



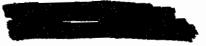
Leonard Westphal
Stewardship & Trust Services Director



---

March 20, 2007

Dr. Walter Thompson

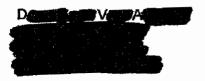


RE: Demand V

Dear Dr. Thompson,

Following up on our conversation from yesterday, enclosed you will find the name of the American family who began a Cash Trust with 3ABN on October 21, 2002 and now they wish to cancel it.

They have received very bad information about 3ABN on a Christian internet forum, "Save 3ABN". They have with us \$70,000.00 and now they want to close the Trust, and I hope you can talk with them and change their minds. Here is their contact information:



We pray the Holy Spirit will be upon you and Mr. and Mrs. A that God's will may be done in this matter.

Sincerely yours.

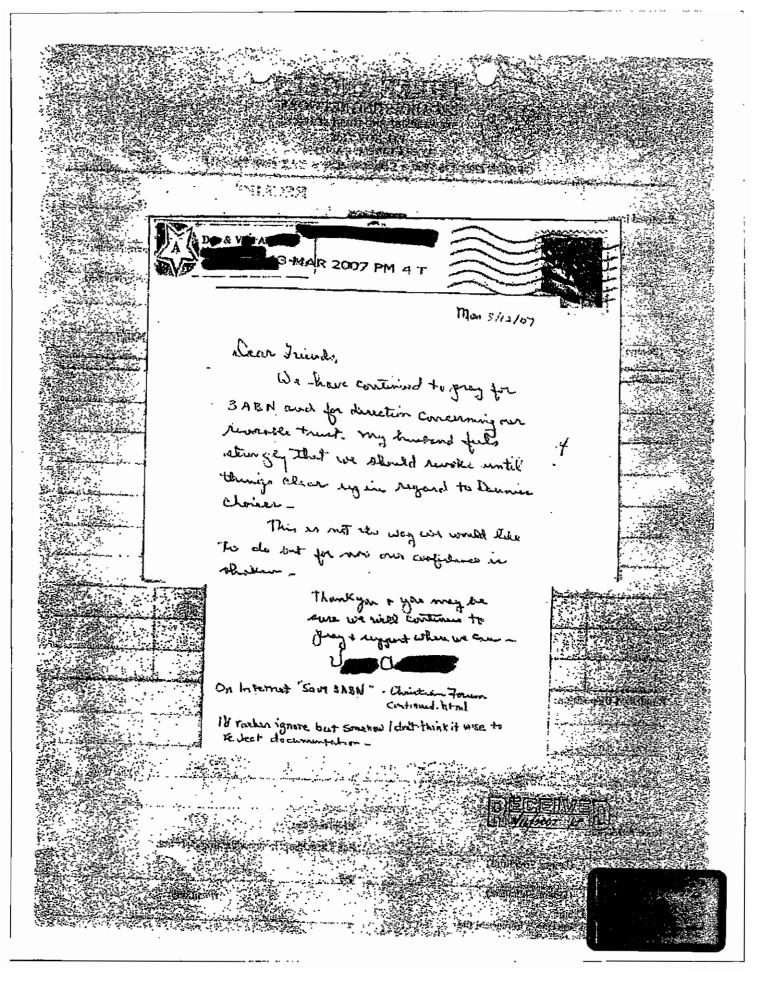
Dr. Leonard Westphal

**3ABN Trust Services Director** 

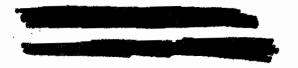
LW/eo



E



\_



mailed 3-27-0-

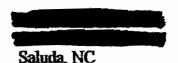
Feb 24, '07

Dear Danny Shelton and 3ABN Board of Directors,

I cannot approve of whats happening at 3ABN and cannot support it financially any longer. We Adventists out here in the ranks are not all totally brain dead. We are aware of the conflict over Danny's behavior. I certainly don't know Lindas guilt or lack thereof. But I ask one question. Who went out and got a foreign quicky devorce? Who got remarried as soon as they could? Do you really think flaunting the new wife makes it OK? What does God have to do? Burn 3ABN down like Battlecreek to get your attention? Is God trying to tell you something with the loss of dish network. It seems on the surface of things that what Danny did gives the lie to his words. I urge you to have Danny step out of the picture and not be seen at all or have any thing to say about 3ABN publicly. In short, resign. As for the Board of Directors, you also should resign for letting it get this far. God deserve's better! Too bad Danny didn't sit tight as time would show who was being on the up and up. But the quicky divorce and remarriage shows who the guilty party is likely to be!

Sincerely,







Г

Page 1 of 1

### Mollie Steenson

From:

Approximately 1979.

Sent

Thursday, April 26, 2007 8:25 AM

To:

Mollie Steenson

Subject: FW: 3ABN Website Question For (Mailroom)

From:

Sent: Wednesday, April 25, 2007 6:07 PM

To:

Subject: 3ABN Website Ouestion For (Mailroom)

at this email address

has sent you the following message:

I want to inform you that I have written to the General Conf., ASI and Amazing Facts with the following information. We have watched 3ABN from its babyhood. We loved Linda and Danny (together). How sad we have been to see those two wrenched apart by the devil. But the even sadder part is that Danny has not stepped up to the 'platform' and confessed his sins in all of this. Those of you that work there and these other organizations that support Danny are hearing his side. Those outside of these areas have only our own wisdom and perception to go by. But we also have the Holy Spirit for guidance. The Holy Spirit cannot continue to support those that do not follow God's word. Until Danny can absolutely show, unequivocally, that Linda is an adulterer and that he is not then our support is gone for good from 3ABN. That's not asking for much since Linda has also asked him to prove the same thing.



E

### **Mollie Steenson**

From:

Sent:

Thursday, April 26, 2007 8:40 AM

To: Mollie Steenson

Subject:

FW: 3ABN Website Question For (Webmaster)

----Original Message----

From:

Sent: Sun 4/22/2007 8:37 PM

To:

Post State S

Subject: 3ABN Website Question For (Webmaster)

at this email address

has sent you the following message:

WE were in the process of ordering the 3abn dish but decided not to because of the way he treated his wife and, married to that woman I will not watch nothing from that station any more untill he is gone and bring her back. I do not know these people but I believe her not him.

