

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**DAVID WANG, RON MacVICAR,
DAVID CHAO, ANNE CHAO and PAT AUCLAIR**

Applicants

- and -

**STEPHEN PRITCHARD, JONATHAN P'NG and
THE CHURCH OF TORANTONIANS**

Respondents

**AFFIDAVIT OF STEPHEN ROBERT PRITCHARD
(sworn March 1, 2007)**

I, Stephen Robert Pritchard, of the City of Toronto, Software Developer, MAKE OATH AND SAY AS FOLLOWS:

Personal Background

1. I am a Director and Treasurer of the respondent corporation, the Church of the Torontonians (the "Church"). I have been a Church Director since 1993. I have also maintained the Church books since 1981 and have served formally as Church treasurer since 1991.
2. I joined the Church in 1973 and was baptized that same year. I was able to assist with the construction of our first meeting hall in 1977 and oversaw the acquisition of the subsequent properties in which our Church meets and houses in which domestic missionaries (whom we call co-workers) reside.
3. After 5 years of regular attendance and commitment, I became a Deacon in 1978, wherein I assisted (and still assist) in the organisation of Church services and other practical matters.

4. I have had the privilege of serving as an Elder of the Church since 1985, assisting with the spiritual governance of the Church and its members. In this capacity I attend conferences, represent the Church, see to the needs of members, visit the sick, counsel people in difficulty, do community outreach through Gospel preaching and charitable endeavours, and facilitate child and youth ministries.

5. My responsibilities as a Director and Treasurer include assisting the President with the secular governance of the Corporation, undertaking governmental filings, seeing to payment of bills and taxes, and issuing of receipts.

6. My role is unpaid and strictly voluntary. I feel I have a responsibility both to God and to my fellow Church members to provide an environment wherein those who attend our Church can come to know the Good News of Jesus Christ and attain salvation.

7. My family is also very involved in the Church, including my wife Selena, my daughter Jesslyn Maurier and her husband Jason.

8. The Church is a voluntary Christian church, which was founded in Toronto in 1967, then formally incorporated in 1974. The Church currently has about 600 members who meet regularly on Sunday (called the Lord's Day) as well as at other times, and on other occasions.

9. I make this affidavit in response to the affidavit of David Wang sworn February 27, 2007 (the "Wang Affidavit"). Throughout the course of this affidavit, when I refer to information from others, I will identify those people, and note that my reference to their belief is true unless I indicate the contrary.

Directors, Officers and Elders

10. I serve on the Church board with its President, Jonathan P'ng, an official with the City of Toronto waterworks department, and who like me also serves as a Church Elder.

11. The Applicant David Wang, ("Wang") also serves as a Director of the Church and is also an Elder, having been made such in 1985 along with me.

12. The Applicant Ron MacVicar ("MacVicar") is a Church member and former Secretary of the Church. He is also an Elder.

13. The other three Applicants are members of the Church. In the case of David and Anne Chao, Mr. Chao had been an Elder, however he abandoned this task some years ago at the insistence of Mr. Wang, who at that time expressed the view that Mr. Chao was difficult to work with. Mr. Chao and his wife Anne are very occasional attendees at our Church.

14. Mrs. Pat Auclair is a long-standing Church member.

Goal of this Affidavit

15. My goal in making this affidavit is to outline:

- A. The Church of the Torontonians – A Brief History;
- B. Recent Events – The Background to the Dispute;
- C. The Church, Membership, Bylaws and the Law
- D. Collusion; and
- E. Other matters;

A. The CHURCH OF THE TORONTONIANS – A BRIEF HISTORY

16. The basic tenet of the Church is that the Christian Church as a whole is, in a spiritual sense, one universal body yet practically, it gathers and is administered locally, within a city or town boundaries as the "local church".

17. Practically there are many local churches, which are described according to geographic location, for example, the Church in Toronto, the Church in Montreal, the Church in Vancouver etc. In everyday activities we refer to our Church as "the Church in Toronto," rather than the legal name, "The Church of the Torontonians."

18. Our practices, we believe, are mirrors of the manner in which the initial Christian believers referenced in the New Testament practiced their faith (ie. the Church in Antioch, the Church in Jerusalem, the Church in Corinth, etc.).

19. Our faith is based on the Bible which we regard as our unique standard of truth and practice. It has been further nurtured by the writings and practices developed by two ministers, Watchman Nee and Witness Lee, whom we regard as having had particular insight and revelation from God.

20. I stress that our Church is an independent entity, both legally and practically. Our forefathers in faith rejected the notion that there was to be an overarching ecclesiastical hierarchy to govern all the churches of our particular faith. This desire for independence – in fact a need for independence – is in keeping with our belief that Jesus Christ will achieve his goal, through many local churches, and bring salvation as was promised in the Gospels.

21. We do have fellowship with other Christian churches, especially with sister churches who have similar beliefs as we do; however that fellowship stops short of ceding governance and direction to others. Such contact is encouraged, but remains voluntary and not necessary or mandatory to our functioning as a viable and independent faith entity.

22. It is important to emphasize (as Mr. Wang notes) that the Church's "administration is local." The Church's spiritual management is undertaken by its Elders who are local members called to service by people we recognize and deem as being apostles of the Lord's present-day ministry.

23. The Church, however, specifically rejects governance by any higher regional, national, or international body or headquarters however established. Over the past years, our requirement to be independent has been challenged (in fact, I have used the phrase that the Church is "under attack") by people who believe that our Church (and its assets) must come under the control of a "worldwide church" administered by a group located in Anaheim, California in the United States of America who are affiliated with a publishing company, the Living Stream Ministry or "LSM" (the "Anaheim group").

24. While the Church is "non-hierarchical" in that its believers are all equal, it is inaccurate to state (as Mr. Wang does) that "We do not accord any person more authority than any other due to their position." It is our teaching and practice that Church Elders, through demonstrated character, abilities and experience, are qualified to lead and shepherd the

Church and its members. As such, the "Elders" do have a position and authority which differs from other Church-members, and make decisions on the direction and faith of the Church, and have done so since the inception of our Church.

25. Church Directors administer the Church through the Respondent corporation: they have the responsibility to manage, protect and enhance Church assets as well as too ensure that the Church carries out its stated objectives.

26. The relationship between the Elders' and Directors' roles in the Church is naturally complementary. Elders, as "shepherds" of the church, properly exercise spiritual and practical oversight over the Church, and Directors are the secular or legal manifestation of the Elders. As with many organisations, there is some overlap. In order to ensure a seamless relationship and coordination between Elders and Directors, it has been our practice to nominate Directors from the ranks of our Elders in order to better facilitate the achievement of the Church's objectives.

B. RECENT EVENTS – THE BACKGROUND TO THE DISPUTE

27. The dispute brought before the Court is in reality the action of a small group of local people aided by outsiders who seek to merge our Church into the sphere of control of the Anaheim group, and the efforts of the Board to resist any such attempt at takeover on both theological and practical grounds in order to preserve the independence and mission of the Church in accordance with its objects.

28. Mr. Wang, aided by people who are not members of our Church and who profess a different understanding of what it means to be "independent", now seek to prevent other people who qualify for membership in the Church (where they have faithfully attended and supported and served for years) from having a full membership voice to exercise their spiritual and religious freedoms within our Church.

29. Sadly Mr. Wang portrays this as a clash of personalities, and targets me specifically. Nothing could be further from the truth. I will briefly identify the opposing philosophies and theologies that are at issue.

30. In response to paragraph 6 of Mr. Wang's affidavit, there is no denomination of "one worldwide Christian church of believers". This is again the error of denominationalism that the Anaheim group is attempting to force upon our Church. What really underlies the effort by the Applicants is an attempt to prevent our Church from exercising its local authority to follow or not follow the recommendations and dictates by others who are not members of our Church. Yet, the Anaheim group claims Biblical sanction for their efforts.

31. Because our goal is to try to co-operate with one another and with other churches in fellowship, the Church is made vulnerable from time to time to outside influences such as the Anaheim group who seek to take control of our Church and install puppet leadership and control the affairs of our Church, even through our fellow members.

32. There is ample evidence of such efforts of the Anaheim group to take control of local churches across North America, most recently in Columbus and Mansfield, Ohio, Pittsburgh, Pennsylvania and elsewhere.

33. The methodology of the Anaheim group in my view is simple: promote discord; accuse church Elders of "illegal activity"; put forward the threat of "quarantine" on those who promote our traditional beliefs on administrative structure (as opposed to theology where there are no fundamental differences), and flood the local church with foreign "visitors" who press a campaign of intimidation on local members to either drive them out of the church or influence them to accept the Anaheim position until such time as the latter can take control of the board of Directors and thereafter implement the latter's changes. That is what they are attempting to do to our Church.

34. When Mr. Wang goes on at length (see paragraphs 25-35 of his affidavit) about the effort made by himself and the Anaheim group to bar good and decent Christian ministers such as Brother Titus Chu from our Church after his attendance and serving here over the course of 30 years, and when Mr. Wang's own affidavit material strongly suggests his constant contact with the Anaheim group wherefrom he appears to inform and seek instructions, points to how insidious these activities and attacks have become. (See Mr. Wang's Affidavit, Exhibits P & U).

35. In the case of Brother Chu, repeated appeals were made to members of our Church by the Anaheim group and other churches under their influence to "quarantine" Brother Chu. Public attacks (non-physical) have been carried out against the Church Elders and Church members simply for their resistance to the efforts of the Anaheim group to impose its will upon independent church bodies.

36. The Elders are responsible to shepherd the Church and when there are situations that need clear direction, the Elders need to lead. In October, 2006 the Anaheim group issued a letter of "quarantine" against Brother Chu, and this brought confusion into the Church in Toronto. The reasoned response of the Elders and Directors was to seek input from the members and thereby to reach a conclusion on this topic for the best interests of the Church as a whole. This issue was not a dispute between members as Mr. Wang alleges, but a position on theological acceptability of Brother Chu to our Church implicit within the Directors' powers to resolve. Consequently the dispute resolution procedure referred to in the Church by-laws and Mr. Wang's affidavit (meant to apply between individuals) was inapplicable.

37. The Church Elders devised a review committee process to seek out submissions to be considered to resolve the discord concerning this quarantine request. We involved our Church members in assisting a Review Committee of the Elders to determine a Church response and position (the "Review Committee"). The responding Church members overwhelmingly rejected the "quarantine" of Brother Chu. Mr. Wang and certain other minority members of the Church proposed every possible objection despite this fair and workable process having ensued on theological grounds to resolve the issue and prevent discord.

38. It is important to note that all the nine Elders were asked to serve on the Review Committee to consider the "quarantine" question. Five declined, for reasons best known to them. That left the four remaining Elders to constitute the Review Committee. (The limitation of committee members to be drawn exclusively from among the Elders is consistent with the Church's teaching that Elders administer the Church.) The group of Elders asked to serve includes both David Wang and Ron MacVicar (2 of the Applicants). They were not alone among the Elders in declining to serve on that Committee. Three other Elders—Bob Duncan,

Soon-Ong Seo and Nigel Tomes—also declined to serve as Review Committee members. It is disingenuous of Mr. Wang to suggest that the Review Committee was “stacked” with people having “strong personal relationships with Titus Chu.”

39. During the Review Committee process, 95 submissions representing 114 members were made. Four of the five Applicants also made submissions to the Review Committee. The Applicants made their objections known, but the membership did not support them in sufficient numbers to warrant adhering to the “quarantine”.

40. Ultimately the Board considered the submissions and issued a Determination Document found at Tab I of Mr. Wang’s affidavit. Mr. Wang was party to the Board meeting on November 5, 2006, the minutes of which are attached as Exhibit “A” hereto.

41. The fact is that Mr. Wang and others are only able to accept the majority view when it coincides with their view.

42. It has been clear for some time now that Mr. Wang and the Anaheim group will not be satisfied until they have caused me, and anyone else who will stand up to them on principle, to leave our own Church or be subsumed into their ranks. They could decide to worship in their own way, one that meets with their particular beliefs and preferences, but it would appear that they rather would seek to take over our Church.

43. The majority of the Board seeks to involve all Church members and admit those who qualify as members (whether they agree with the position taken by the Board or not) to express their voice at forthcoming meetings that will determine our continuing governance as a Church and Church corporation. It is to that expression of self-determination that Mr. Wang and the other applicants object, and also what motivates this costly and unnecessary battle.

C. THE CHURCH, MEMBERSHIP, BY-LAWS and the LAW

44. Traditionally, membership in our Church -- and by this I mean the people who vote on issues of governance and on nomination of Directors -- are the lifeblood of our Church. Without them, no Church would survive. We, as practicing members, encourage others to

take the steps to become vested members and join those existing members, where all are recognised as full participants in the Church's mission and objectives.

45. As a Church, we regrettably did not always keep abreast of civil law compliance issues in the governance of our affairs. This has led to inadvertent failures in corporate filings and on at least one occasion required an act of Provincial Parliament to revive our Church corporation.

46. On one occasion, in 1991, this also led to an application to the Court by some members to take control of the Church by attempting to appoint a receiver over alleged financial mis-management, which case was dismissed.

47. It is instructive to note that the Honourable Mr. Justice Austin, in reviewing this internal division noted:

"As to the other matters, they are all internal concerns. The court is very reluctant to involve itself in such matter. The proper avenue for relief is, in the first instance, through church procedures and offices."

48. In 1994, the Church passed the set of by-laws that are in force today. Special attention was placed on membership qualifications through designation of a Membership Affairs Committee ("MAC"). The MAC as envisioned was constituted by the presence of the Directors, the Elders and members equal to the number of Elders.

49. The MAC did function as a vehicle to admit members between 1994 until 2003. In practice, however, that process did not work particularly well. We could not get sufficient commitment from members to serve on the MAC. When they met, which was often a last minute and perfunctory review of applications for membership, there was dissatisfaction expressed by members of MAC as to its effectiveness as a part of the membership process.

50. It was only during this calendar 2007 year that Mr. Wang expressed difficulty with the current non-involvement of the MAC in membership vetting.

51. In 2002, the role of the MAC was curtailed by vesting membership qualification in the Board itself, and leaving overall acceptance of proposed members to the members themselves.

This step was taken long before this present dispute and was in reaction to advice the Board and Elders received from legal counsel, and which was put to the members who accepted it.

52. Attached hereto as exhibit "B" to this my affidavit is a copy of the meeting agenda and script from June 16, 2002 wherein the authority of the MAC to admit or remove members was clearly removed.

53. Through inadvertence, the minutes of the June 16, 2002, meeting were not prepared at the time, and when reconstructed on June 22, 2003, the approval of By-law Number 2 was, also inadvertently, omitted (see Exhibit "C").

54. Since that time, with the exception of 2003 when there had been uncertainty because of the loss of the minutes of the previous general meeting and the MAC continued to recommend membership, all members have been admitted after being qualified by the Board, not the MAC.

55. As a member of the current Board, Mr. Wang has participated and played a part in the membership qualification process in 2004, 2005 and 2006, during which time member qualifications were approved and voted on by the membership. It appears now, when Mr. Wang has a perception that the process we have followed these past 3 years does not meet with his desired result, he seeks to discard it and effectively disenfranchise people whom otherwise qualify for full fellowship with him as a member of our Church.

56. It is not true that Mr. Wang as a Director did not have input into the application process. Both the membership application form and the proposed by-laws were tabled at Board meetings at which Mr. Wang participated. He may not have agreed with the decisions of the Board but he did participate in the meetings and made suggestions on what he viewed were form deficiencies or how the form could be made acceptable in his view.

57. At an afternoon Board meeting on February 10, 2007, the application form for new voting members was tabled for discussion. I explained at that time that the form was basically the same as that used in 2006 except that the 2007 form was more detailed in order for the criteria to be verifiable. I e-mailed both the 2006 and 2007 membership application forms to Mr. Wang so that he could compare them. He advised that he needed "more time" to read the

form even though it was only a one-page document with a one-page announcement. He said that he would call me back later that evening. Five hours later (at 10:30 PM Toronto time, 7:30 PM Anaheim time) Mr. Wang called me to resume the discussion. He was resigned to the other Directors going ahead with the announcement. It is not true that Mr. Wang had stated his objection to the Board going ahead with the announcement.

58. The membership criteria are not new and they do not deviate from the bylaws. This is shown in the table attached as Exhibit "D" herein which maps the membership criteria to the existing by-laws. These membership criteria were agreed and deemed by the Board to be equivalent.

59. As a result, the membership criteria do conform with the bylaws.

60. As recently as February 24, 2007 Mr. Wang attended at a Board meeting wherein the applications of 197 membership applicants were considered. Mr. Wang did not object to any person being included or excluded for consideration for membership in the Church by the Board. Ultimately, as I have noted, the final decision rests with the members.

61. I note that in his affidavit, Mr. Wang does not state that any of the 106 people recommended for membership are not qualified to become a member nor has he taken issue with the 91 persons deferred from membership recommendation for reasons including a lack of support for and a lack of service within the Church.

62. I can advise the court that the Board instituted an appeal procedure for reconsideration. Though that process is not complete at the date of this Affidavit only 3 of 91 persons to date have appealed and at least 2 persons appear to have good cause for reconsideration. It will be my recommendation that they be put forward for membership so as to vote at Sunday's meeting.

63. I have provided my counsel with copies of all the membership applications. I have instructed counsel to make these available to the presiding judge if she or he would find them to be material. My only caveat to this is that these records are confidential in that some of them identify whether or not the applicant is a donor to the Church. I would be reticent to provide these without some assurance from the Court and counsel that these records would

remain confidential. If access is to be granted to the Applicants' counsel, that access should be subject to the condition they not be copied in any way, or disclosed to anyone including the Applicants other than Mr. Wang, who as a Director is entitled to examine them.

64. Contrary to the Mr. Wang's allegations in paragraph 17 of his affidavit, and as described below, all matters relating to the activities of the Board of Directors have been carried out in accordance with the bylaws.

65. On February 10, 2007 I attended at a meeting of the Board. The only item on the agenda was the process for nomination of new members and the membership application form. When Mr. Wang said that he wanted to talk about the date of the business meeting, Mr. P'ng replied that he should table it as an item on the agenda. Mr. Wang said that he would propose June 24, 2007 as the date of the business meeting. Both Mr. P'ng and I agreed that we would consider it and discuss it at our next Board meeting.

66. At the February 17, 2007 Board meeting we set March 4, 2007 as the Annual meeting date, to which Mr. Wang objected on the grounds of it being too "rushed". Concerned with the reports of harassment by Anaheim group sympathisers given to me by Church members because of their support of our Church, I indicated that proper notice would be given to the members, and it was in fact.

67. I am advised by Mr. P'ng, and I believe that, contrary to what Mr. Wang asserts in paragraph 53 of his Affidavit, Mr. P'ng did not state "that since he and Steve Pritchard were the majority they could do as they pleased".

68. The new bylaws clean up the confusion that has resulted from our previous efforts at revising our bylaws. In order to be fair and impartial and to be seen as being fair and impartial, we need to use measurable criteria in accordance with the bylaws, which can be applied with equity across all Church-members (irrespective of their loyalties) in order to determine their eligibility for admission.

69. In no way is anyone trying to manipulate the Church members' vote; rather, we are acting in the best interests of the Church-members, the Church and the Corporation by trying to obtain fair representation of the views of the Church-members and include all those who as

members have a stake in the ongoing affairs of the Church. This allows many members of Chinese descent (who encompass a large number of regular attendants) to be adequately and fairly represented.

70. Virtually every year we admit new members, if some Church-members have shown commitment to the Church and as a result deserve the opportunity to have a voice in the Church corporation. We are simply continuing this practice this year.

71. The Directors would have no more control under the proposed new bylaws than those conferred under the current bylaws. The Directors are responsible to implement the Church's bylaws and their actions are circumscribed by those bylaws. In fact, the procedures in the new bylaws are more explicitly defined and would therefore circumscribe to a greater degree the Directors' powers to revoke memberships. The scope for Directors to arbitrarily exercise power is in fact reduced under the new bylaws. Hence, we are at a loss to understand Mr. Wang's claim that the Directors would have more power under the new bylaws.

72. In a Spring 2006 Elders' meeting, the Elders discussed the idea of imposing a 10% on the number of new members admitted to the Church but that idea was not put into effect. In my view, those who qualify for membership should apply and be accepted for membership in their Church.

D. COLLUSION

73. When it became evident that Mr. Wang was acting as a conduit to convey information to persons connected to the Anaheim group and was receiving directions from persons connected to the Anaheim group, we were constrained to reduce his participation in the discussion of sensitive issues related to resisting attempts by the Anaheim group to subjugate the Church to its control. Nevertheless Mr. Wang was still included in the decision-making process of the Corporation, in his capacity as Director, as required by the bylaws.

74. Recently, Jonathan P'ng and I began to take some measures to protect the Church as we are required to do at law on account of the contrary interests which our fellow Director Mr. Wang was espousing. We became aware that Mr. Wang was operating in concert with the Anaheim group to the extent of reporting our Board meetings to them, even to the extent

of emailing them during the course of our Board meeting. Exhibits P and U of his affidavit clearly show communication with the Anaheim group and his counsel. It is significant that Mr. Kwan, a legal counsel with the Anaheim group notes to Mr. Wang and others in Exhibit "U" that "we now have some major decisions we need to consider going forward . . ."

75. The Living Stream Ministry (whom I identified as being part of the Anaheim group) lists on the internet copy of its 2004 US IRS Tax Records (attached hereto as Exhibit "E") that it is a California-registered non-profit organisation. Its 15-member Board includes the following 7 Officers (plus 8 other Directors): Benson Phillips (President), Andrew Yu (Secretary), Francis Ball (Vice-President), Ron Kangas (Senior Editor), Ray Graver (Treasurer), Ed Marks (Senior Editor), Kerry Robichaux (Assistant Secretary).

76. At least 3 of these people appear in Mr. Wang's email at Exhibit P, and 2 at Exhibit U.

The Anaheim group's "Ground Offensive" in the GTA

77. The Church in Toronto's rejection of the Anaheim group "quarantine" of Titus Chu was a direct affront to the Anaheim group. They responded with a campaign against the Church in Toronto. That's why I and other certain of Elders and Directors declared that "the Church is under attack!"

78. The Anaheim group's campaign against the Church in Toronto has involved a "ground offensive"—sending a succession of high profile workers from the Anaheim group to the GTA for "trainings." The minority of the Anaheim group sympathizers within the Church have cooperated with the Anaheim group to recruit Toronto Church members to these events.

79. In December 2006 and January 2007 the following Anaheim group-personnel have visited the Toronto area: Benson Phillips, Ron Kangas, Kerry Robichaux, Minoru Chen (President of Bibles for America, an LSM-affiliate), Bob Danker (S. California), Samuel Liu (S. California & Taiwan), Livingstone Lee (S. California & Taiwan), Albert Lim (S. California).

LSM's Internet Offensive against Toronto

80. Simultaneously with their "ground offensive" the Anaheim group launched an "internet campaign" denigrating the Toronto Eldership. This is most blatant in a series of articles posted on the Anaheim group-affiliated website, AFaithfulWord.org. The series is entitled, "Has the Truth Changed or Have Some Metro-Toronto Elders?" To date it amounts to 28 pages and 12,500 words. The unabashed goal is to attack the Eldership of the Toronto Church. For example "Part 3" concludes with the calumnious accusations that the Toronto Elders "have separated themselves 'from the fellowship...of the local churches, the expression of the one body, and the truth, does not change; the brothers in Toronto have. What a tragic loss to them and to the saints in Toronto who would follow them!"

81. Given this situation and this overt series of attacks, Mr. P'ng and I have been compelled to take action in the best interests of the Church members, the Church and the Church corporation. We have not made Mr. Wang privy to all our discussions, but despite his collusion we have continued to involve him in all Board-related matters.

E. OTHER MATTERS

82. It is not true that surveillance cameras were set up to record the meetings (services), as alleged in Mr. Wang's affidavit. The Church has had the practice for years, and still does, of recording some ministry meetings so that the members who missed the meetings due to various reasons (e.g. serving in the children's service), could still avail themselves of the tape to receive the ministry. When this is done, a video camera is set up at the back of the room, facing the person ministering, to record what is spoken. The Church has a tape library of ministry messages spoken during conferences (whether local or external), or other ministry meetings, which are available for the Church members to borrow.

83. No one requires permission of the Elders to visit their relatives. I have spoken with Mr. Robert Duncan who denies this accusation as made by Mr. Wang at paragraph 36B of his Affidavit.

84. Ron MacVicar was removed from his position as Secretary in the best interests of the Church corporation and following discussions by the Board at a meeting at which Mr. Wang was present.

85. Contrary to Mr. Wang's assertion, no threats were made at meetings or in writing to "discipline" any member for attending meetings at the church in Brampton. The Elders have continually warned against those who seek to further discord in our Church, including participating in events, viewing or circulating emails and DVD's that in our view foster discord.


86. Mr. Wang at paragraph 3b(f) of his Affidavit complains about me establishing a new website for Our Church. He neglects to mention that the site formerly used was subverted to include materials that attack Our Church and its Elders and Directors. In response, we started a new website.

VOTING

87. It is interesting to note that the "lastadam" web site (attached hereto as Exhibit "F") includes materials dated February 24, 2007 posted by Applicants Messrs. Wang and MacVicar urging their supporters to vote against the by-law amendment and nominate new Directors to presumably replace myself and Mr. P'ng. Frankly, that is their right and privilege and indeed a membership vote is in fact the appropriate way of resolving such disputes.

88. I make this affidavit in support of resistance to the Application, and for no other or improper purpose.

SWORN BEFORE ME at the City of
Toronto, on March 1, 2007.


Commissioner for Taking Affidavits


Stephen Robert Pritchard

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at TORONTO

AFFIDAVIT OF
STEPHEN ROBERT PRITCHARD
(SWORN MARCH 1, 2007)

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