

1 April 30, 2019

2  
3 Los Angeles International Church of Christ  
4 Orange County Region  
5 Jaeho Park and [REDACTED]  
6 10 Goodyear, Irvine CA 92618

7 International Churches of Christ - General Counsel  
8 [REDACTED]  
9 2716 Ocean Park Blvd. Suite 2006  
10 Santa Monica CA 90405  
11 4010 Barranca Parkway, Suite 100  
12 Irvine CA 92604

13 **Subject: Response Letter**

14 **SECTION ONE**

15 After taking the time to reflect and to consult legal advice, I am writing to inform you of my  
16 participation in professionally licensed therapy sessions and participation in national recovery  
17 step groups, to present an offer of resolution for this outstanding issue, and provide further  
18 supporting facts and documentation.

19 Be advised that, for more than a year, beyond the entirety of 2018, I have:

- 20 1. Attended over 45 direct hours (66 total) in professionally-licensed Christian-based therapy  
21 sessions.
- 22 2. Spent more than \$7600 in professionally-licensed Christian-based therapy sessions.
- 23 3. Participated in more than 112 direct hours (185 total) of nationally-recognized recovery  
24 step programs.

25 These actions demonstrate that the requisite focus, attention, dedication, seriousness, and  
26 commitment to examine such areas in a 'clear' and 'consistent' manner has more than adequately  
27 been satisfied by me. I have proven change in behavior that is both factual and documented.  
28

## **Offer of Resolution**

Because I have satisfied your requirements, I present this offer of resolution, and ask that the church leadership:

1. Publicly reinstate my membership to the church both verbally and in writing, in the same original public scope as before (the OC regional singles population), and
2. Publicly clarify the church's policy regarding the recognition, acceptance and support of professionally licensed therapy,
3. by way of including, the following suggested Reinstatement Letter text.  
(see the Reinstatement Letter Text below)

If you accept this offer of resolution, then we can further discuss the final Reinstatement Letter wording and a date for Reinstatement. Then, this outstanding issue may be brought to a close and this issue can be left in the past.

If you choose to decline the offer of resolution, then please review in the following **SECTION TWO**, the supporting facts, documentation, and further questions, and please reply with your answers to all of the questions listed.

Please reply in writing with your decision to the return address.  
PO Box 61930, 1 League, Irvine CA 92602

I trust that you will make the right decision.

Signed,

Tom Tracey

## **Exhibits (I)**

- 1.1 Log of therapy costs and hours
- 1.2 Receipts for licensed professional therapy
- 1.3 Log of recovery group participation
- 1.4 Sample pamphlets & attendance tokens
- 1.5 Counseling progress report
- 1.6 OC Region announcement "Disciples In Motion"

**Sample Reinstatement Letter Text:**

*To the brothers and sisters in the Orange County region,*

*A while ago we came before you out of concern for our brother Tom Tracey. Since that time, Tom has demonstrated “clear” and “consistent” actions of repentance, at significant personal investment of time and resources for well over a year. We therefore are welcoming him back with open arms into the fellowship as a recognized member, brother and fellow believer in the Lord. We ask you to welcome him back into the fellowship and reaffirm your love for him.*

*We are also clarifying the ICOC policy of the church regarding professional therapy. As a church, we acknowledge and support the professional therapeutic process. Although Orange County does not currently have any licenced therapists on staff, other regions and churches do.*

*At no time will a member be discouraged from seeking or criticized for participating in, professional therapy and/or support groups outside of the International Churches of Christ, and we ask the congregation both respect the choice of anyone who participates it, and also the confidentiality of its process.*

*We are committed to helping all our members grow in their faith and living a life to the full. The recent programs that were held at the Goodyear Building, “Disciples in Motion,” demonstrate that we support therapeutic recovery process to help believers receive healing and growth in their lives. Going forward, the Orange County staff will readily recommend and refer professional therapy whenever situations may warrant, in the hope that members may receive the best possible help for overall health and well-being.*

## SECTION TWO

### Facts and Documentation, and Further Questions

If you choose to decline the offer of resolution in Section One, then please review the following supporting facts, documentation, and further questions, and please reply in writing your answers to all of the questions listed. The main chapters of events (in bold) are presented in reverse-chronological order going back in time. (2018 back to 2016)

### DISFELLOWSHIPPING LETTER

On November 28th, 2017, at a regional singles midweek meeting at the 10 Goodyear, Irvine, building, BRUCE WILLIAMS read a “letter of disfellowshipping” publicly to the ministry, in which he said:

“HE HAS CONSISTENTLY REFUSED TO SIT DOWN AND ALLOW US TO HAVE THESE DISCUSSIONS, SO WE HAVE NO CHOICE BUT TO NO LONGER CONSIDER HIM A MEMBER OF THE ORANGE COUNTY CHURCH OF CHRIST.”

There are many elements of this statement that are inaccurate, false, misleading and slanderous, for the following reasons:

1. There were in fact two meetings with leadership, on Sunday September 10th, 2017 (leadership meeting #1), and on Sunday, September 24th, 2017 (leadership meeting #2).
2. There was much preliminary communication I had with [REDACTED] leading up to these meetings, and who was in communication with BRUCE WILLIAMS.
3. At the first leadership meeting on September 10, 2017, there were discussions of the “unresolved conflicts” issue, which were both referenced by JAEHO PARK who

mentioned the letter I wrote to him, and also acknowledged by BRUCE WILLIAMS, who mentioned that the matter would have to be addressed.

4. At the first leadership meeting on September 10, 2017, with the help of my therapist we came to a verbal agreement on a reconciliation plan.
5. This plan was subsequently emailed to church leadership on September 11, 2017.
6. A follow-up email was sent to church leadership on September 23, 2017.
7. Church leadership never replied to either email.
8. My therapist was at the meeting on September 10, 2017 and was witness to these events.
9. My therapist gave his business card to Jaeho and Bruce and said to give him a call.
10. I signed release documents so that BRUCE WILLIAMS could communicate directly with my therapist.
11. A second meeting with leadership was arranged for September 24th, 2017.
12. At the second leadership meeting, BRUCE WILLIAMS himself refused to attend.
13. The “text” response from Bruce given at the second meeting, acknowledged the existence of the reconciliation plan - which was rejected by church leadership.
14. At the first leadership meeting, JAEHO PARK wanted me to “step back” from the fellowship for a period of time - it was not a disfellowshipping.
15. And there are other facts I will refer to.

Therefore because of these facts,

- To say that I “consistently refused to sit down,” is false, inaccurate, and misleading.
- To say that I “refused.. to allow us to have these discussions,” is false and casting blame, whereas I had brought the issues up, and leaders acknowledged it would need to be addressed.

- To say “we have no choice,” ignores the many opportunities of the reconciliation plan verbally agreed to in the first meeting, the follow up emails sent, the communications options provided in both meetings, and the communications release document.
- To say “but to no longer consider him a member,” is materially different from what JAEHO PARK said at the first meeting and had been verbally agreed to.

These statements in the letter mislead the congregation into thinking that I simply and stubbornly never met with you. This is at least, factually inaccurate and a misrepresentation of the truth, or at most, an outright lie and a deliberate cover up by leadership. This misleads the congregation by slanderous assertions of blame that were not true, and a deliberate omission of facts and actions that demonstrate good faith on my behalf. This letter was spoken by BRUCE WILLIAMS, and signed by Elders JAEHO PARK and [REDACTED] and told to the entire singles ministry of approximately 150 people. Further knowledge of this has spread to the greater Los Angeles church population.

My repeated statements about the emotional and spiritual abuse that occurred has been ignored and not addressed by the church leadership, so I will reiterate them. There are other assertions within the “letter of disfellowshipping that I will speak to.

## **Exhibits (II-III)**

- 2 Letter of Disfellowshipping
- 3.1 Copies of emails sent to leadership
- 3.2 Samples of text communications

## Questions Part A

Now, aside from these conclusions, I have some questions that I am requesting your answers to:

1. As I have demonstrated the “clear and consistent” actions mentioned above in Section One, as a reasonable comparison, can you please state for each of the paid staff of each of the Sectors the OC Church, the answers to the following:
  - A) How many hours of professional counseling have you personally completed?
  - B) How many hours of recovery or support groups have you personally attended?
  - C) What are the approximate total monetary amounts you have personally spent on counseling or therapy?
2. Please fully explain why BRUCE WILLIAMS refused to attend the second leadership sit down meeting that he himself had requested?
3. The letter of disfellowshipping also asserts that I did not resolve with a brother and am therefore no longer a member. As this now sets a precedent for situations of lack of resolution, how do you plan to implement this policy going forward?
4. In the letter of disfellowshipping, [REDACTED] signed his name as an Elder. At the time of its writing, I had not spoke with [REDACTED] for many, many years. Why did [REDACTED] never talk to me to independently corroborate the facts before consenting to the opinion and signing the letter?

## SECOND LEADERSHIP MEETING

After the first leadership meeting (9/10/2017), I was contacted by [REDACTED] and told that the leaders wanted to meet with me again, but without my therapist in attendance.

I asked for a reason why, and he relayed that BRUCE WILLIAMS said it “WOULDN’T BE SHOWING TRUST IN LEADERSHIP”.

This answer was confusing and illogical. I conveyed that it was not about them, but that I wanted the support from my therapist.

On September 24th, 2017, I met with [REDACTED] for the second meeting with church leadership. This occurred after the presentation and verbal agreement of a reconciliation plan presented in the first leadership meeting. There was back-and-forth communication leading up to this meeting. However, I was told that BRUCE WILLIAMS would not be there. I was told that JAEHO PARK was out of town and could not attend. [REDACTED] verbally read a text message from BRUCE WILLIAMS of a judgment that leadership had made. Below is the response to the assertions made.

### LEADERSHIP JUDGEMENT “TEXT”

TEXT QUOTE: “... IT APPEARS TO US THAT HE IS MORE CONCERNED ABOUT HIS PERCEIVED EMOTIONAL AND SPIRITUAL ABUSE HAPPENING TO HIM THAN THE DAMAGE HE HAS CONTINUED TO DO TO OTHERS.”

BRUCE WILLIAMS says that my claims of emotional and spiritual abuse are “perceived,” and they are disregarded and invalidated.

1. However, I present over **285 pages** citing the effects of the emotional and spiritual abusive behavior from church leadership and representatives that has been mentioned above. Also see the 19 page citation summary.
2. I have repeatedly called out this abusive behavior to church leadership in person and texts.
3. In letter I had previously read to JAEHO PARK, I explained how I also suffered from suicidal ideation for a period of time.
4. In the first leadership meeting, my multi-page statement to JAEHO PARK regarding the existence of abusive behavior was acknowledged, and BRUCE WILLIAMS said that the issue would have to be addressed. There was knowledge of this information. Yet this was never addressed in the official disfellowshipping letter or brought up and I was summarily deemed no longer a member.
5. BRUCE WILLIAMS’ comments demonstrate that there is no concern whatsoever to the effects their behavior has had upon me. This response does not show a willingness to listen to claims of abuse from leadership, but rather a reckless disregard of such claims.
6. The church should be aware that instances of abuse have happened before in the ICOC. There have even been clinical studies regarding psychological abuse within the ICOC churches that have been conducted. (exhibited)

BRUCE WILLIAMS says that I have caused unspecified “damage” to certain women.

1. In fact, BRUCE WILLIAMS has never spoken with the women whom he claims I have damaged.

2. Neither have the Elders spoken to them.
3. **I have written statements from these sisters defending me.**
4. They do not speak of “damage” - but rather they defend my character and state that I treated them with respect.
5. BRUCE WILLIAMS’s allegation of “damage” is judgmental and uncorroborated.

## PASTORAL COUNSELING ICOC POLICY

The **International Church of Christ Minimum Standards policy document** states in the **Pastoral Counseling** section the following:

*“From time to time, issues arise during counseling sessions that require assistance beyond the minister’s expertise. ... When faced with these issues, the ministry staff is cautioned to refer such individuals to outside professional counseling to help the person resolve these difficult issues in the best way possible. It is imperative that each staff person documents the referral to professional counseling and make sure that the church keeps a record documenting the referral.”*

This explains in a policy document that ICOC church leadership are to work with professional counselling personnel. Policy language like “cautioned” and “imperative” directed towards leadership stress the importance of this policy - which was ignored by the OC leadership. On the contrary, by my actions I clearly demonstrated and voluntarily sought out higher level of care. I recite the following facts.

1. I personally, voluntarily, sought out professional counseling starting in March 2017.

2. I sought out input from four different therapists\*.
3. One licensed therapist I spoke to, currently on staff in another region of the Los Angeles church, provided valuable feedback.
4. I was referred to a local therapist by another brother in the OC church.
5. Two other brothers in the OC church have visited this same therapist.  
They were [REDACTED] and [REDACTED]
6. I later signed a waiver allowing BRUCE WILLIAMS to communicate directly with my therapist, and this was conveyed to him by [REDACTED]
7. BRUCE WILLIAMS never called or communicated with him.
8. I was never referred to counseling by ministry staff.
9. The Elders/Evangelists did not want the therapist at the second meeting.
10. Their assertion was that it was ‘NOT DEMONSTRATING TRUST’ in leadership.
11. BRUCE WILLIAMS refused to attend the second leadership meeting.
12. Nor was JAEHO PARK in attendance.
13. BRUCE WILLIAMS only sent a text message to [REDACTED] be read to me.

It is very clear that the church leadership was not following the official church policy - and acting suspiciously as well. In the Letter of Disfellowshipping it again states I must “DEMONSTRATE[D] TRUST IN THE LEADERSHIP OF THE CHURCH..” By again stating this, both publicly and in writing, it reinforces the implication of an anti-policy and anti-therapist stance by leadership.

**Exhibits (IV-IX)**

4 Journal entries citing emotional distress (19+288)

5.1 Written statement from Sister #1

5.2 Written statement from Sister #2

5.3 Written statement from Sister #3

6 ICOC Minimum Standards - Pastoral Counseling section and referral form

7 Therapy Waiver to share information, Emails to Therapists

8.1 "DISCIPLE ABUSE" Discipleship Journal, Issue 30

8.2 Clinical study: "Brief Report: Perceived Psychological Abuse and the Cincinnati Church of Christ" (ICOC)

8.3 Clinical study: "An Investigation of a Reputedly Psychologically Abusive Group That Targets College Students" (ICOC)

8.4 Clinical study: "Boston Church of Christ Movement Study Reveals Cultic Group's Abuses" (ICOC)

8.5 Review: "The Boston Movement: Critical Perspectives on the International Churches of Christ"

9 Transcribed SMS text from BRUCE WILLIAMS

\*One referred 'therapist' had only completed required educational classes to become a licensed therapist but I learned he had not taken the licensing examination.

**Questions Part B**

1. In the text sent by BRUCE WILLIAMS, he claims that I have caused unspecified “damage” to certain women:
  - A) Please specify exactly what “damage” he is referring to.
  - B) When did it take place? What were the times, dates, and locations?
  - C) Which women did he speak with? When did the interviews take place?
2. With regards to church member counseling skills, can you please state, for each of the paid staff of each of the Sectors the OC Church, the
  - A) educational qualifications,
  - B) certifications earned,
  - C) training received, and
  - D) continuing education units fulfilled,that demonstrate the personal training and skills acquired to effectively counsel the members of the church?
3. How many professional counseling referrals has the Orange County leadership issued in the past 5 years? In the past 10 years?
4. Where is the documentation of such referrals being saved?

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5. Explain why the elders and evangelists are refusing to communicate with a licensed therapist?
  6. Please explain why the church leadership did not take seriously the reports of emotional and spiritual abuse within the church?
  7. What actions has the leadership taken since that time to investigate any instances of abusive behavior?
  8. Church leadership is asserting that seeing a therapist or having a therapist in attendance at a meeting, is somehow not “DEMONSTRATING TRUST IN LEADERSHIP.”  
What then will be the consequences for the two other brothers who also saw a therapist?  
( [REDACTED] and [REDACTED]

## **FIRST LEADERSHIP MEETING**

On September 10, 2017, I met at residence of [REDACTED] to sit down with church leadership.

In attendance was [REDACTED] JAEHO PARK, BRUCE WILLIAMS, my therapist, and myself.

### **(Discuss your membership in the church)**

Although I thought the meeting would discuss matters with my relationship with my ex-girlfriend, the leaders opened the meeting saying that this was to discuss my membership in the church.

1. There was no discussion about giving counseling to our relationship.
2. No questions were asked about the state of our relationship
3. No help offered or acknowledgements of requests I had made.

### **(Policies of the Church)**

BRUCE WILLIAMS spoke about how my behavior went against the policies of the church.

1. However, there are no policy documents explained to the members regarding membership in the church.
2. Nothing is posted on the church websites regarding membership policy documents.
3. There are no church policy documents given to any church members on a recurring annual basis.
4. There are no such documents given to any members upon baptism or entering the church.
5. No arbitration agreements are ever signed by membership.

The **International Church of Christ Minimum Standards policy document** also states:

*“03.03 Membership in the church: Each church shall establish written qualifications of membership including methods for voting on all corporate matters in accordance with corporate bylaws and for purposes of the Biblical exercise of church discipline.”*

No “written qualifications of membership” exist for the church members, nor have ever been distributed annually to membership to my knowledge of the church for over 28 years.

**(“YOU'RE A PREDATOR”)**

During the meeting, [REDACTED] made harsh assertions against a sister and myself.

[REDACTED] said

“YOU.. TOOK ADVANTAGE OF AN EMOTIONALLY BROKEN WOMAN.. YOU’RE A PREDATOR!”

These inflammatory and judgemental assertions made openly are an about-face from all previous discussions I had with Eric.

1. I had repeatedly asked for counseling for myself and ex-girlfriend.
2. [REDACTED] wife [REDACTED] knew I wanted to meet with them. At a midweek meeting in late August, Rissa greeted me and acknowledged that we would be meeting with them soon.
3. My ex-girlfriend had called [REDACTED] months prior, asked about meeting, and mentioned we still liked each other.
4. [REDACTED] had said multiple times when I previously met with him, that he wanted to

1 be my advocate.

- 2 5. [REDACTED] has publicly admitted (while talking about his purity group) that he had  
3 formerly been sexually immoral multiple times while in the campus ministry, and now sat  
4 casting judgemental allegations against me.  
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7 **(Not to be in Kids Kingdom - Childcare)**

8 During the meeting, JAEHO PARK said that I was not to serve in Kids Kingdom. I had not  
9 served in Kids Kingdom for well over 15 years, yet church leaders have now cast me as a threat  
10 to children. This is irrational and unfounded.  
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13 **(Attitudes toward leadership)**

14 When I shared about letter I had read to JaeHo, there was a surprised response and BRUCE  
15 WILLIAMS asked if I had any “attitudes toward leadership.” I shared how I had struggled with  
16 it, and there was obvious dismay from the leaders. This displayed the unspoken rule that you  
17 must not have ‘bad attitudes’ toward leadership, and cannot question or have dissenting opinions  
18 about the leaders.  
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21 Then BRUCE WILLIAMS shifted the conversation and said “..WE’RE HERE TO TALK  
22 ABOUT YOUR ADDICTION.” It was clear that, without being licensed therapists themselves,  
23 the leaders held pre-judgements firmly in their minds without corroborating all the facts. While  
24 leaving the meeting, I talked with my therapist and asked asked him if he thought that I was an  
25 “addict,” he replied that he did not think that I was an “addict.” And this was after many months  
26 of having therapy sessions with him and discussing all events leading up to the meetings, and  
27 hearing my side of the story.  
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3 **(“We will be patient with you”)**

4 Towards the end of the meeting, BRUCE WILLIAMS said “WE WILL BE PATIENT WITH  
5 YOU” as the next steps were decided upon. However, this was counteracted by the  
6 ‘disfellowshipping letter’ stating that I was now “no longer a member” of the church.  
7

8 **(Came to Agreement)**

9 By the end of the meeting a verbal agreement was made with the therapist’s input, about  
10 3-month plan, and subsequent meeting again. I sent an email two days later, recapping meeting,  
11 and delivering the Reconciliation Proposal. However, the church leadership never replied to my  
12 emails, and later rejected this plan from the therapist, and subsequently disfellowshipped me.  
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16 **Exhibits (X-XI)**

- 17 10 ICOC Minimum Standards - written qualifications for membership  
18  
19 11 Texts asking for assistance, Copies of emails sent to leadership.  
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22 **Questions Part C**

- 23 1. After I had repeatedly asked for relationship counseling assistance, why was this ignored  
24 by church leadership?  
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27 2. Why did the leadership JAEHO PARK say he did not want me serving in Kids Kingdom?  
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3. I have been a member of the church for 28 years - from the age of 19 to 47 - having made lifelong friendships and family relationships, and serving the church in many ways, over decades; so why was I now suddenly considered a threat to the church?.
  4. Why has there never been any “written qualifications for membership” provided to its members? What actions will you take to correct this?
  5. [REDACTED] has been a self-taught and supposedly subject-matter expert who has conducted church “purity groups” for many years. He often would receive phone calls from region leaders around Los Angeles for assistance dealing with difficult situations and provide advice. What formal education has he received and professional licenses has he obtained which qualifies him to provide specialized counseling and therapeutic advice to the elders and evangelists in the church?
  6. There are many Christian Counseling organisations such as:
    - National Christian Counselors Association ( <http://www.ncca.org/> )
    - American Association of Christian Counselors ( <http://www.aacc.net/> )
    - Southern Baptist Association of Biblical Counselors ( <http://www.sbabc.org/> )
    - National Association of Nouthetic Counselors ( <http://www.nanc.org/> )
    - Association of Biblical Counselors ( <http://www.christiancounseling.com/> )

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Have any of the OC leadership staff maintained membership in any such counseling organizations at any time?

## MEETING WITH JAEHO

### Summary of Incidents from Letter to Elder

On May 20th, 2017, I met with Elder JAEHO PARK and read to him a letter (summarized below) that chronicled for over a year, the emotionally and spiritually abusive behavior from leadership:

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### Background

Prior to [REDACTED] becoming a bible talk leader, I felt like we were friends and could confide in each other. After he became a bible talk leader, I felt the friendship connection lessened and he spoke more out of authority than as a friend. I felt like he was using his authority to establish his dominance over me, like being the “Alpha dog.” I felt like we were in the same “foxhole” yet he was telling me to shoot faster.

### Idylwild Trip

During a trip to the mountains on or around April 9th, 2016, [REDACTED] criticized me for not completing a lesson beforehand, and confronted me for not helping bring luggage down to a car when I was speaking to someone. Later after the trip, I was criticized by him for actually giving a ride to one of the group members, a mother and her 2 children, saying it was “unwise.”

### Sunday Hospitality Service

Even before the service, I told him that I was running sound that Sunday and could not promise I could help out with setup/takedown in the fellowship hall because of the time it took to setup and

1 take down the gear before and afterwards. I didn't feel good about the last-minute poor planning  
2 of the activity. I was reluctant to help out, but I said I would come over after finishing with the  
3 sound. Steve saw me talking to a sister, and challenged me later on not helping out more. When I  
4 came in, the work had been done by campus brothers.  
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6  
7 Around April 2016, [REDACTED] confronted and accused me of allegedly wrong  
8 behavior and said, "YOU TEXTED [REDACTED]" ([REDACTED] was a sister in the bible talk  
9 who was labeled as "NOT DOING WELL SPIRITUALLY" by [REDACTED]  
10 Because of these continued conflicts, [REDACTED] escalated and wanted to have a  
11 meeting with BRUCE WILLIAMS, the evangelist of the North Orange County sector of the  
12 church.  
13

#### 14 15 **May 1st meeting - False Accusations**

16 The meeting happened on May 1st, 2016, at the church rental facility in Anaheim after the  
17 evening service. In attendance was [REDACTED] BRUCE WILLIAMS, and [REDACTED]  
18 [REDACTED] and myself.  
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20 In this meeting there were many false accusations [REDACTED] made about me. There  
21 were many inaccuracies and misrepresentations about what happened and where my intentions  
22 were at. Some of the false accusations which I disagreed to included:  
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- 24 1. Texting a sister in the discussion group who was perceived as "struggling," or "not doing  
25 well spiritually." (implying that there was something impure going on.)  
26
- 27 2. Giving unknown women "lingering hugs"  
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3. Giving a woman a hug with "a motion on the back."

4. Saying to a sister at church “you look beautiful.. thank you” (implying there were impure motives.)
5. Giving a ride to a small group weekend event to a single mother and her children.  
[REDACTED] said later that this was “UNWISE”. (implying there were impure motives.)
6. That there were “FOUR SISTERS” in the bible talk feeling uncomfortable around me.
7. That going to a Denny’s Restaurant at the end of a double date, to discuss an impasse in communication, with a woman whom [REDACTED] had known, was “UNACCEPTABLE!” (Also with the implication that there were impure motives.)  
When [REDACTED] said “UNACCEPTABLE!”, during the conversation, he slammed his hand down on the table with a bang, and said it loudly. This was harsh and shocking to me.

In these allegations,

- NO names of the women were provided,
- NO dates or times were provided,
- NO explanations were given about these.

The atmosphere of this meeting was confrontational and emotional. Because of the repeated false accusations against me, I did not feel free to respond and was coerced into obedience.

There was judgment and admonishment from BRUCE WILLIAMS, who at one point said,

“THERE’S A LOT OF DARKNESS IN YOUR HEART.”

BRUCE ordered me to go back into “purity group” - a voluntary and private men’s recovery group guided by [REDACTED] a volunteer in the church, and self-taught subject matter expert in “purity” issues, although not a certified therapist.

### **Resolution Talk**

On May 29, 2016, I sat down with [REDACTED] and [REDACTED] for the purpose of having a “resolution talk.” I shared that there are many points raised by [REDACTED] that I felt were used against me unfairly and out of context. There was no fact-checking, but rather repeated accusations. At that time [REDACTED] admitted that he had a “self-righteous, judgemental” attitude. However, the earlier accusations were not recanted.

### **Other Texts**

There were other text conversations that went on between myself and [REDACTED] that were emotionally abusive.

- “IT’S NOT ABOUT USING THINGS AGAINST YOU..
- “GOD WILL NOT BE MOCKED..”
- “YOUR SIN WAS EXPOSED FOR WHAT IT WAS..”
- “AND PLEASE TAKE NOTE THAT AFTER RECEIVING ADVICE FROM THE MEN, A SOLID DIRECTION WAS GIVEN TO YOU..”
- “YOU’RE BACKPEDALING TOM..”
- “I UNDERESTIMATED THE MAGNITUDE OF YOUR SIN..”

## Midweek Conflicts

I had conflicts with [REDACTED] during midweeks. After one midweek we got into an argument in the back patio where [REDACTED] had said -

“YOU’RE IN DEEP SIN!”

I disagree with slandering one another with such accusational phrases. At another midweek, [REDACTED] accused me of being “UNREPENTANT” or “GOING ROGUE” by not having "d-times" with [REDACTED]

This would lead to him demanding that we sit down with BRUCE WILLIAMS. Over the following days there were heated text exchanges.

The truth was that my discipling partner at the time, [REDACTED] had cancelled getting together three times in a row. [REDACTED] later confessed that from the beginning he didn’t want to be my discipler due to bitterness from past history, and that he considered me “A LOST CAUSE.” (spoken on/around April 29, 2016)

This was hurtful to hear, from a brother with a reputation of being such a strong leader of the bible study series and being in the church many years.

## Met w BRUCE WILLIAMS

[REDACTED] had demanded that I sit down with BRUCE WILLIAMS again after perceived lack of repentance with "d-times" as mentioned above.

- I did not want to meet but had been threatened by [REDACTED] for unwillingness.
- I was under duress.
- When I shared in the meeting the nature of my distress, it was invalidated.

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2  
3 The meeting was arranged for May 1, 2016. In the meeting, I shared Galatians 6:10, “But if you  
4 are always biting and devouring one another, watch out! Beware of destroying one another.” and  
5 I said I had now felt terrified by [REDACTED]

6 The emotional abuse I was describing was ignored and invalidated, and instead BRUCE  
7 WILLIAMS referred to a scripture from 2 Corinthians 6:11-13 and I was admonished and  
8 commanded to “open wide my heart” to Steve. In the meeting, BRUCE WILLIAMS said that he  
9 had spoken to other unknown Elders about me and my situation, and gave me a warning, said I  
10 was not to sing on stage, or be on the church’s dating website,  
11

12  
13 I met with my Purity Group the next night and told them what had happened. When asked if I  
14 had agreed with the decision, I said “Hell no!, I didn’t agree, but who can disagree with Bruce?”  
15

### 16 **Suicidal thoughts**

17 After that meeting I was very anxious and depressed and I struggling with suicidal thoughts for  
18 some weeks. I had envisioned in great detail a revolver before me, and thought about when &  
19 where to do it, before the congregation.  
20

### 21 **Seeking different bible talk**

22 In late 2016/early 2017 I felt it was important to seek out a different bible talk (small group).  
23 However, due to all that had transpired in the past year I did not feel free to be able to do so. I  
24 visited another bible talk. I spoke with [REDACTED] that I was thinking of changing  
25 bible talks. I spoke with [REDACTED] about it. None of them said it was a bad idea or that I  
26 could not do that.  
27  
28

1  
2  
3 **Getting resolved - created anxiety.**

4 In early 2017 [REDACTED] talked about the need to get “resolved” about the things in  
5 the past. However, his statements about this only stirred up emotional anxiety about the past  
6 hurts. I was open about my anxieties with [REDACTED] and [REDACTED]. After the  
7 anxiety had peaked and I talked to [REDACTED] his response was “time for a change.”  
8

9  
10 **Regional Singles Meeting (Disfellowshipping Announcement)**

11 There was a Regional Singles Meeting on Friday, March 3rd 2017, where it was announced the  
12 public disfellowshipping of another brother and sister, and a public confession by another sister.  
13 After the announcements were made by the elders, all the singles were commanded by BRUCE  
14 WILLIAMS to get into discipling groups to confess sins.  
15

16 After the discussion groups, I felt compelled to confess something personal to [REDACTED]  
17 [REDACTED]. However, I realized that due to all that had transpired the previous year, he again  
18 had an accusational attitude toward it. On the following Sunday after service, [REDACTED]  
19 [REDACTED] mentioned to me that I should talk to [REDACTED] and tell [REDACTED] or  
20 he will be sad. Because of all the emotional conflict that had transpired, I was hesitant. Before I  
21 had a chance to talk to [REDACTED] went ahead and told him, and [REDACTED] was sad because of it.  
22 I don’t know why [REDACTED] had done that. It hurt the relationships and this broke trust.  
23  
24

25 **Talked to [REDACTED] - March 5th**

26 I met with [REDACTED] on March 5th 2017. I told [REDACTED] that I had started to go to  
27 therapy. He expressed dismay that I had to go outside the church for help.  
28

1  
2  
3 **Slandered before leaders**

4 At a leader's meeting early March, [REDACTED] told the group slander about me by  
5 saying "HE'S IN SIN!", He's "GONE ROGUE!" and other discussions went on that I am not  
6 aware of. This was told to me by [REDACTED] who was present at the leader's meeting.  
7 This further broke trust.  
8

9  
10 **Sermon illustration from podium - March 21, 2017**

11 At the singles midweek service on March 21st, [REDACTED] gave the message to the  
12 congregation. From the podium, he used me as a sermon illustration. [REDACTED] said  
13 publicly:  
14

15 "THIS BROTHER, WHEN ASKED ABOUT HIS SIN, SAID 'IT'S PRIVATE!', AND A  
16 WALL OF PRIDE WENT UP IN HIS HEART!"  
17

18  
19 I was very hurt that he spoke down to me while preaching at the podium. I was publicly  
20 slandered. The facts were incorrect. Obviously [REDACTED] told [REDACTED]  
21 about our conversation, where when [REDACTED] asked what was talked about in my  
22 therapy sessions, I told him that it was private. I had signed a confidentiality agreement when I  
23 started seeing the therapist.  
24

25 I left a message for [REDACTED] about it. He replied later that he understood, and would  
26 keep the matter in mind regarding [REDACTED] leadership methods. I later spoke to  
27 [REDACTED] about what he had shared to [REDACTED]  
28

### **Ostracized from bible talk**

I have been ostracized from the bible talk because mistrust was spread among the women by

[REDACTED] In late March 2017, I had texted a friend in the bible talk. I heard later

from [REDACTED] that this “freaked her out” and she had talked to [REDACTED]

[REDACTED] about it. Since we have had a normal friendship up until this time, this showed that I was now mistrusted.

By [REDACTED] asking “how I’m doing spiritually,” showed that I had been cast in a bad light within the bible talk, and my “spirituality” was now judged and mistrusted.

He shared that it was announced in the bible talk that if anyone had questions about me, to talk to

[REDACTED] about it. I disagree with this controlling directive that was given,

separating me from relationships.

This same situation happened before a year prior when a sister, was supposedly “NOT DOING

WELL SPIRITUALLY.” Now [REDACTED] was treating me the same way. I disagree with this controlling behavior.

### **[REDACTED] previous behavior**

[REDACTED] was suspected of previous immorality in the singles ministry. Years ago, I

witnessed [REDACTED] being at a woman’s apartment, in her room privately, when the rest of us arrived for a group activity. There was awkwardness, and something had gone on.

Soon afterwards [REDACTED] and the sister left the church and eloped. Years later they would return to the church to get restored. Later after his separation or divorce, [REDACTED]

[REDACTED] admitted to me that he had been with another woman.

1  
2  
3 **Double standard, hypocritical**

4 I have struggled for more than a year because of [REDACTED] self-righteousness and  
5 judgmental attitude, all the while knowing that he has been immoral himself more than once.

6 I've endured false accusations that were used as ammunition against me to cast me as an  
7 unrepentant sinful brother to be brought before leadership and judged and slandered. I have cut  
8 off a best friendship in order to prevent sin, and then called a sinner and judged before others  
9 who have done worse than me. It was said that I'm "GOING ROGUE", when he was the one  
10 who left the church and eloped.  
11

12  
13 **Boundaries**

14 I refuse to be in same family group as [REDACTED] I must establish boundaries that are  
15 safe for me. I will not have any more sit-downs with [REDACTED] It is clear that  
16 [REDACTED] has a certain way of viewing and controlling others that is reminiscent of  
17 the Pharisees. This legalistic, judgmental attitude does not lead to true healing but only to  
18 condemnation. I have suffered enough emotional trauma because of [REDACTED]  
19 behavior, and I will not be tolerate further emotional abuse.  
20

21  
22 I have been very hurt by all that has transpired for over a year. Although the church is proud of  
23 its doctrine, in the name of zeal much harshness can occur, and judgement is condoned rather  
24 than real healing. I have been disillusioned by the legalistic self righteous culture that has been  
25 created.  
26  
27  
28

After sharing this information with a church elder, my complaints about leadership practices and my request for boundaries were not heard, but I was continued to be pressed to face the very people instigating emotional and spiritual abuse, without my side of the story believed in, nor with any protection against retaliation from those in authority.

## CONCLUSIONS

For over two years, I have endured emotional distress caused by a pattern and practice of emotional and spiritual abuse at the hands of church leadership or its representatives. Leadership in the church employed abusive discipling practices creating an atmosphere of slander, defamation, and emotional and spiritual abuse, resulting in documented emotional distress. I was bullied for non-conformance, falsely accused of sin, admonished for what was not sin, retroactively punished for what I had already repented of (repentance was attested to), berated, bullied, ignored, invalidated, slandered privately and publicly at leaders meetings and before the congregation, publicly shamed, and wrongfully disfellowshipped. I had difficulty sleeping, persistent anxiety, suicidal thoughts, and loss of productivity at work.

Furthermore, the abusive experiences I endured are not an isolated incident but have occurred previously in the ICOC church, both in Los Angeles and elsewhere. It seems like every decade if not more frequently there are significant incidents which emerge through documented publications which highlight systemic problems that continue to resurface in the ICOC.

1 Already mentioned above and in exhibits are numerous studies published in the 80's and 90's  
2 citing psychological abuse within the ICOC.  
3

4  
5 In 2003 such practices were described in the infamous Henry Kriete letter "Honest to God," in  
6 which is says:

7 *By and large, intentional and unintentional, we have become a religious hierarchy that*  
8 *has created, fostered and sustained a culture of control and dependence on men, rather*  
9 *than freedom.*

10 *Over time, however, we've evolved into a culture that has not respected the dignity of*  
11 *human freedom, but instead has sought to control the lives of those under us and around*  
12 *us. Well-intentioned or not, we have failed to become a people pleasing to God. I believe*  
13 *that God is now opposing our cult of personality, and our abuse of spiritual authority in*  
14 *the strongest possible way.*

15 *We have universally maligned our critics, and tried to protect our members from reading*  
16 *'spiritual pornography'. Other materials are also censored from widespread*  
17 *circulation-brilliant and Scripturally insightful papers from some of our own teachers*  
18 *among them. Papers that have gone against the party line.*

19 *We have routinely humiliated and marginalized those members who speak out as 'critical'*  
20 *and 'disloyal.' Many of our churches have autocratic leaders. We give perks to the*  
21 *compliant, and bigger paychecks to those higher up the chain of command. We reward*  
22 *outward conformity.*

23 *We have also exerted 'influence' or suppressed suspicions by the use of 'spin', non-*  
24 *transparency, and double standards. For example, we are very open about the sins of*  
25 *those underneath us, but not those 'above' us, because 'it will hurt the church'. We have*  
26 *given our evangelists an authority greater than our elders, when clearly, the elders have*  
27 *higher moral and spiritual requirements for leadership as 'overseers of the flock' Men*  
28 *who are specifically commanded to guard that which was purchased by the blood of*  
*Christ. How can this be?*

*We have seen almost all criticism of the movement to be sinful. We accuse people of*  
*having bad hearts or bad attitudes or independent spirits, when very often, they have*  
*every right to feel as they do. When anyone does leave the church, they are automatically*  
*categorized as a 'fall away.' But why? Many have left because of conscience issues, or*  
*harsh treatment, or from feeling trapped and guilty by the way they've been led. Is it fair*  
*or right to declare that they have left God because they've decided to leave our ranks?*

Others choose to stay, but live in constant fear of being branded as divisive or disloyal if they disagree, and will routinely follow bad advice for the sake of submission. Others simply go numb, suffer in silence, sit at the back or just roll over and play dead.

#### *On Discipling*

*We have assumed, wrongly, that the sheep are stupid. We have trained them to depend on men, on us in fact, and not on Christ. 'Did you get advice' for the most part means 'Did you get permission.' Yes of course, they are vulnerable and open to attack, but they are not stupid. It is we who have been stupid, Biblically and spiritually. Should we not assume, rather, that a true, Spirit-filled Christian desires to please God, not to rebel? Ezekiel 36: 'I will give you a new heart and put a new spirit in you; I will remove from you your heart of stone and give you a heart of flesh. And I will put my Spirit in you and move you to follow my decrees and be careful to keep my laws'.*

*Through our discipleship partner theology, we have attempted, like modern-day Pharisees, to put a hedge around God's law. In trying to protect or control the Christians, we have routinely violated their liberty in Christ. We have not trusted disciples to live by their own convictions and decisions (and mistakes), and have fostered in them an unhealthy dependence, rather than freedom to grow and mature. Many of our discipling guidelines are nothing more than 'rules taught by men', condemned by Jesus as burdensome and legalistic. No control mechanisms, or traditions of men, or rules and culturally accepted regulations will keep anyone faithful who does not want to be faithful in their heart. But they will create rebellion and criticalness among sincere and liberated Christians. We did not become new creations to be controlled by men; rather, 'it is for freedom Christ has set us free'*

Then in 2014, the results of a formal arbitration in the Los Angeles church was published, in which it states circumstances of resurfaced abuses:

#### THE WESTSIDE CHURCH CONSULTATION A MINISTRY OF THE LA INTERNATIONAL CHURCH OF CHRIST CONCLUDING SUMMARY & REPORT (JUNE 30, 2014)

#### Part II - Assessments #2 Overly Assertive Leadership Group Confrontations

**#2—Overly Assertive Leadership Group Confrontations (renounced).**

*There was an era in the ICOC history in which it became prevalent in some regions for a leader to receive a “Discipleship Group correction” led by a higher-up leader for some reason—sin, performance, or lack of compliance. These styles of discipleship groups were practiced less and less over time but were not fully eradicated. Someone would show up to a meeting in which everyone, except the subject, was fed unfavorable information, possibly inaccurate or with incomplete perspectives, against the unsuspecting subject. Often the charge was “pride” and “pridefulness.” It was said, “You can always get someone on pride.” This approach puts someone in a no-win situation because it makes it impossible to defend oneself without being labeled “defensive.” The outcome of this ramped up approach, in the mind of the consultants, leans towards injustice.*

*One of the leaders who occasionally used this approach conceded that he would be frustrated when someone on staff seemed unresponsive. His response was “the Hail Mary pass” of stepping up the confrontation within a group setting, “which, looking back was less healthy and not at all helpful.” The group confrontation was a painful factor behind some of the critiques discovered within the OHA.*

*There are many problems with this tactic, which feels like “ganging up,” that we renounce, even for people struggling with pride, egotism, arrogance or hubris. While strong approaches may appear effective at times, they engender a culture of silent reservation, fear, unhealthy pacts, and contain a risk of emotional and psychological harm. During our interviews and following our teaching, no one has defended the heavy-handed practices of group confrontation.*

*We do support small group confrontations when they follow a sequence of impartial investigation, involve impartial third parties, the vetting of capable witnesses, and allow for advocacy and defense of the accused as well as prior transparency about the nature of such a meeting. Some of the previously hurt parties received apologies for these meetings prior to our arrival. The practitioners of the heavy “old school” approach agreed with our assessment.*

1 This same occurrence of abusive “ganging up” leadership confrontations mentioned in the  
2 WESTSIDE CONSULTATION document also happened to me in the Orange County Region -  
3 so to say that this was “renounced,” or that it was “practiced less and less over time” makes it  
4 appear as ended, but in Orange County it has continued happen, against myself and other  
5 members.  
6

7  
8 I have again documented the circumstances of church abusive practices that occurred in and after  
9 2016. As mentioned previously, at meetings I was forced to attend, unfavorable and false  
10 accounts were given about me, I was unable to defend myself, called demeaning things, judged  
11 by leadership assigning motives, suspected and criticized, and wrongfully punished. Whatever  
12 church policies existed, they have not been disseminated to the congregation nor does it seem  
13 they are followed.  
14  
15  
16

## 17 **Exhibits (XII)**

- 18 12.1 Excerpts from “Discipling Dilemma” - discipling hierarchy, confession to third parties
  - 19 12.2 Excerpts from “Honest to God” - Henry Kriete - 2003
  - 20 12.3 Excerpts from The Westside Church Consultation - 2014
- 21  
22  
23

## 24 **Questions Part D**

- 25 1. “Ganging Up” on people - this has happened to me and to others in Orange County - what  
26 policies will be enacted to stop this from happening in the future? What recourse will be  
27  
28

1 made available to lay members if they encounter this situation again?

- 2
- 3
- 4 2. The Westside Consultation document states there is no ‘method’ to bring complaint
- 5 against a leader - why has nothing been done by ICOC leadership about this ? what formal
- 6 program has been implemented?
- 7
- 8 3. There has been much documented controversy over the institution of a “discipling
- 9 hierarchy” in the church. What studies have been conducted and published by the ICOC
- 10 supporting its overall transformative effectiveness as compared to other models?
- 11
- 12
- 13 4. How specifically will the church leadership mitigate gossip and slander? What educational
- 14 communications, like letters, handouts, brochures, website postings, confidential
- 15 counseling, etc, will be implemented?
- 16
- 17 5. What published training classes are given to all bible talk leaders prior to them becoming
- 18 leaders? How often are bible talk leaders required to take any follow-up training or are
- 19 their leadership practices reviewed?
- 20
- 21
- 22 6. There have been repeated instances over time of harsh, aggressive discipling techniques in
- 23 the history of the ICOC and even recently. Promises have been made in the past without
- 24 formal policy changes. What specific public actions will the church take to prevent such
- 25 abusive behavior from happening in the future?
- 26
- 27
- 28

1 7. I was the fourth “disfellowshipping” in the Orange County Region in 2017, and there was  
2 another in early 2018, **totalling five** within a year’s time frame. How many of those  
3 disfellowshipped have been successfully rehabilitated and deemed healthy active members  
4 today? What post-action interviews or debriefings have been conducted with these people  
5 and how do they feel about the church policies and process?  
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13 **END OF SECTION TWO**  
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