

# EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
-----X  
HOLY SPIRIT ASSOCIATION FOR THE UNIFICATION OF  
WORLD CHRISTIANITY,

Plaintiff,

-against-

WORLD PEACE and UNIFICATION SANCTUARY, INC.,

Defendant.

Index No: 3:18-CV-1508

-----X

1251 Avenue of the America  
New York, New York

March 25, 2019  
9:15 a.m.

Videotaped Deposition of Plaintiff, by  
HAK JA HAN MOON, taken pursuant to Order, before  
Rita Persichetty, a Notary Public of the State  
of New York.

1 APPEARANCES: (Cont'd)

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1 APPEARANCES: (Cont'd)

2  
3 ALSO PRESENT:

4 TIMOTHY ELDER, Check Interpreter

5 HYUN OOK SUH, Check Interpreter

6 KAYE ALLEN

7 DR. KI HOON KIM

8 OLGA MAJITOVA, ESQ.

9 WON JU McDEVITT

10 HO YUN YOUNG

11 MICHAEL McDEVITT

12 DAN MACOM, Videographer

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1 ----- I N D E X -----  
 2 WITNESS EXAMINATION BY PAGE  
 3 HAK JA HAN MOON MR. POLAK 6  
 4  
 5  
 6 ----- E X H I B I T S -----  
 7 EXHIBITS DESCRIPTION FOR I.D.  
 8 Exhibit 93 CD 118  
 9 Exhibit 94 CD 154  
 10  
 11  
 12 (EXHIBITS RETAINED BY MR. POLAK)  
 13  
 14  
 15  
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1 P R O C E E D I N G S  
 2 THE VIDEOGRAPHER: We're going on the  
 3 record. The time is 9:16 a.m. Today's  
 4 date is March 25, 2019. This deposition  
 5 is being held at the offices of Davis  
 6 Wright Tremaine in New York, New York.  
 7 Here begins the videotaped deposition  
 8 of Ms. Hak Ja Han Moon taken by the  
 9 defendant.  
 10 This case is filed in the United  
 11 States District Court for the Middle  
 12 District of Pennsylvania. The case number  
 13 is 3:18-CV-1508, in the matter of Holy  
 14 Spirit Association for the Unification of  
 15 World Christianity versus World Peace and  
 16 Unification Sanctuary, Incorporated.  
 17 My name is Dan Macom in association  
 18 with Stewart Richardson, which is located  
 19 in Indianapolis, Indiana. I'm the video  
 20 specialist today. Our court reporter is  
 21 Miss Rita Persichetty, also in association  
 22 with Stewart Richardson.  
 23 The appearances of all parties  
 24 present here will be recorded on the  
 25 written record. I'll ask at this time

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1 that our reporter please swear in the  
 2 interpreter and then the witness, please.  
 3 F R A N Y O U N,  
 4 Korean interpreter, having been sworn by  
 5 the Notary Public, translated as follows:  
 6 H A K J A H A N M O O N,  
 7 called as a witness, having been sworn  
 8 by the Notary Public, was examined and  
 9 testified as follows:  
 10 EXAMINATION BY  
 11 MR. POLAK:  
 12 Q Good morning, Mrs. Moon. My name is  
 13 Jonathan Polak. I'm the attorney for the  
 14 Sanctuary Church.  
 15 Do you understand that?  
 16 A I mean, this is the first time I'm  
 17 meeting you.  
 18 Q That's right. I don't believe we've  
 19 ever met before, have we?  
 20 A That's correct.  
 21 Q I know you've been deposed before; so  
 22 you understand the process. But I'd like to  
 23 explain a few things before we start, if that's  
 24 okay with you.  
 25 A Okay.

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1 Q The first is: As you know, because  
 2 you speak Korean and the jury that will be  
 3 hearing this deposition speaks English, we have  
 4 an interpreter here.  
 5 So because this is interpreted, I  
 6 would ask you to not answer until I complete my  
 7 question and to not start answering until the  
 8 interpreter has completed interpreting the  
 9 question for you in Korean.  
 10 A Yes.  
 11 Q Also, if you have a long answer to  
 12 one of my questions, I would ask that you break  
 13 it up into parts so that the interpreter can  
 14 correctly translate and interpret the  
 15 questions -- I'm sorry -- interpret your  
 16 answers.  
 17 A I do understand.  
 18 Q Okay. You do?  
 19 MR. POLAK: She does understand?  
 20 Thank you.  
 21 Q And if you need more time to complete  
 22 an answer, you need to let me know because I  
 23 want to give you the opportunity to provide a  
 24 full answer to my questions.  
 25 A Okay.

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1 Q Did you do anything to prepare for  
2 today?  
3 A No, nothing.  
4 Q Did you meet with any lawyers?  
5 A Yes.  
6 Q What lawyers did you meet with?  
7 A I mean, the ones who are here present  
8 in this room.  
9 Q Mr. Rosenfeld?  
10 A I mean, can you just ask their names?  
11 MR. ROSENFELD: I'm Mr. Rosenfeld.  
12 A Yes.  
13 Q Did you meet with any other lawyers?  
14 Do you want to raise your hand down  
15 there?  
16 A Yes, the gentleman who's sitting  
17 right next to him.  
18 MR. POLAK: Could you state your name  
19 for the record?  
20 MR. BENSFIELD: James Bensfield.  
21 Q Did you meet with them to prepare for  
22 your deposition today or before today?  
23 A I -- I met with them yesterday.  
24 Q What time yesterday?  
25 A Around 2:00 o'clock.

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1 Q Did you review any documents during  
2 that meeting?  
3 A No. I talked about myself.  
4 Q Who else was present at that meeting?  
5 A Dr. Kim.  
6 Q Anybody else?  
7 A No.  
8 Q Was your security detail there?  
9 A No. They were downstairs.  
10 Q When did you arrive into the United  
11 States?  
12 A On the 23rd, evening.  
13 Q How long will you be in the United  
14 States?  
15 A What does that have to do with this  
16 lawsuit?  
17 Q The way this works, Mrs. Moon, is  
18 that I ask questions, and if your lawyers have  
19 an objection, they will object. But,  
20 otherwise, you need to answer the questions.  
21 A I intend to stay here until  
22 mid-April.  
23 Q Do you have other business in the  
24 United States on this trip than being here  
25 speaking with me?

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1 A I'm supposed to speak at a -- at the  
2 mega church.  
3 Q Where is the mega church?  
4 A In Los Angeles.  
5 Q What day?  
6 A April 6th.  
7 Q How long has that speech been  
8 scheduled?  
9 MR. HYUN OOK SUH: I have objection  
10 to her interpretation.  
11 MR. POLAK: Okay. No, but you need  
12 to state the objection, what you think was  
13 the correct translation on the record in  
14 English.  
15 MR. ROSENFELD: And to speak up  
16 loudly.  
17 MR. HYUN OOK SUH: Oh, okay. I think  
18 she said that she asked when -- since when  
19 has she been preparing as your question  
20 was --  
21 THE INTERPRETER: No.  
22 Q My question was how long has the  
23 speech on April 6th been scheduled for, or  
24 something like that.  
25 THE INTERPRETER: May the interpreter

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1 make an objection to that objection? It  
2 was interpreted correctly. I asked the  
3 witness when -- how -- since when had that  
4 been scheduled. That's the question that  
5 I interpreted.  
6 MR. POLAK: Do we have an answer yet?  
7 THE INTERPRETER: No.  
8 MR. POLAK: Okay.  
9 A In 2012, I went around the world and  
10 I met with presidents of various countries; so  
11 there was a summit. I attended the summit.  
12 MR. HYUN OOK SUH: I object to her  
13 interpretation. Mother Moon said in 2018,  
14 not in 2012. In 2018, she toured the  
15 world where she hosted various summits,  
16 where she met with heads of states from  
17 these various nations.  
18 MR. ROSENFELD: And, Jonathan, I'll  
19 just -- just as a matter of procedure,  
20 I'll just assume that every time our  
21 interpreter has an objection, I'm not  
22 gonna jump in and state that I have an  
23 objection. That objection is sufficiently  
24 preserved for the record as our -- as our  
25 objection.

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1 MR. POLAK: Absolutely.  
 2 MR. ROSENFELD: Thank you.  
 3 THE INTERPRETER:  
 4 MR. ELDER: I object to the check  
 5 interpreter's translation. She did not  
 6 say hosted. She just said that there were  
 7 summits. She did not say host. That word  
 8 --  
 9 MR. HYUN OOK SUH: She said what?  
 10 MR. ELDER: She did not say she  
 11 hosted. The check interpreter said she  
 12 hosted some meetings. She did not say  
 13 host. That word was added by the check  
 14 interpreter.  
 15 BY MR. POLAK:  
 16 Q So, Mrs. Moon, as I understand it,  
 17 the purpose of this trip that you're on right  
 18 now is not only for this deposition but also  
 19 for this Los Angeles event.  
 20 A That's correct.  
 21 Q And your trip to the United States  
 22 for this Los Angeles event has been scheduled  
 23 for a long time.  
 24 A Yes.  
 25 Q Do you have other business here in

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1 the United States other than this April 6th  
 2 event?  
 3 A What does my private business have to  
 4 do with this litigation?  
 5 Q Again, Mrs. Moon, the way this  
 6 process works is that you're here to answer my  
 7 questions. And if your lawyers have an  
 8 objection to my question, they will make it.  
 9 And if they believe you shouldn't have to  
 10 answer, they will tell you not to answer. But,  
 11 otherwise, you need to answer my question.  
 12 A What was the question again?  
 13 Q What other business do you have here  
 14 in the United States between now and April 6th?  
 15 A I'm an international leader.  
 16 Q So what -- what types of things --  
 17 you don't have to tell me who you're meeting  
 18 with on each day at each time. I'm not asking  
 19 for that level of detail.  
 20 Is it -- is it enough to say that  
 21 you're going to be conducting church business  
 22 here in the United States until the date you  
 23 leave?  
 24 MR. ROSENFELD: Objection to form.  
 25 A Yes, that's correct.

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1 Q What is the Unification Church?  
 2 A It is -- Unification Church believes  
 3 in -- in True Parents.  
 4 MR. HYUN OOK SUH: I object. She  
 5 said the Unification Church is a church of  
 6 True Parents.  
 7 MR. ELDER: Yes. The check  
 8 interpreter's second interpretation is  
 9 correct. The Unification Church is the  
 10 True Parents' religion is what she said --  
 11 is what the witness said.  
 12 Q What does it mean to be the church of  
 13 the True Parents' religion?  
 14 A There's just one thing that -- it  
 15 fulfills the creator -- God's creation  
 16 principle.  
 17 MR. HYUN OOK SUH: I would object.  
 18 I'd like to say Mrs. Moon said, "It is the  
 19 church that implements the principle of  
 20 creation of God the Creator."  
 21 MR. ELDER: I object. She said it's  
 22 the church that brings to reality the  
 23 principles of the Creator. She did not  
 24 use the word "God."  
 25 MR. HYUN OOK SUH: Object. She did

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1 say (speaking Korean) God the Creator.  
 2 MR. ELDER: She said that not to the  
 3 lawyer but to the interpreter.  
 4 THE INTERPRETER: May the interpreter  
 5 ask something, please?  
 6 MR. POLAK: Sure.  
 7 THE INTERPRETER: Because in any  
 8 other Christianity, the word that she used  
 9 is God. But I just wanted to make sure  
 10 for further proceedings to have -- to use  
 11 the word "Creator" and not use "God."  
 12 MR. POLAK: And -- okay. So the word  
 13 in Korean was what?  
 14 THE INTERPRETER: God was the creator  
 15 or Creator God.  
 16 MR. HYUN OOK SUH: God the Creator.  
 17 MR. POLAK: Okay. So when we use  
 18 that word, we'll call it God the Creator.  
 19 I don't know if we're gonna be using the  
 20 word again, but we will use God the  
 21 Creator, does that work for everybody?  
 22 THE INTERPRETER: So it's okay for  
 23 the interpreter to use the word "God"?  
 24 Because I think that's the objection they  
 25 made, that --

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1 MR. POLAK: Yes. It sounds like we  
 2 need to say "God the Creator" for that  
 3 particular Korean word.  
 4 THE INTERPRETER: Okay. Okay.  
 5 BY MR. POLAK:  
 6 Q Okay. Who controls the Unification  
 7 Church?  
 8 MR. ROSENFELD: Objection to form.  
 9 A It's the founders, the True Parents.  
 10 Q Who are the True Parents?  
 11 A The only begotten son and the only  
 12 begotten daughter.  
 13 MR. ELDER: Objection. She listed  
 14 the only begotten daughter first. Only  
 15 begotten daughter and only begotten son.  
 16 Q Who is the only begotten son?  
 17 A 2,000 years ago, God the Creator  
 18 chose the Nation of Israel or people of Israel,  
 19 and through them he sent Jesus Christ, and he  
 20 is the -- the only begotten son.  
 21 Q Who is the only begotten daughter?  
 22 MR. HYUN OOK SUH: Objection.  
 23 MR. POLAK: Oh, sorry.  
 24 MR. HYUN OOK SUH: She said 2,000  
 25 years ago, God chose the people of Israel,

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1 and for the first time in 4,000 years, he  
 2 sent Jesus Christ as his only begotten  
 3 son.  
 4 Q So Jesus controls the Unification  
 5 Church?  
 6 A Jesus had to die on the cross. And  
 7 at the time of his death, he said he was going  
 8 to come back. And he was going to come back  
 9 and have a Celebration of Little Lamb. The  
 10 fact that he's coming back is because he did  
 11 not fulfill his -- fulfill his mission.  
 12 MR. HYUN OOK SUH: I object. Jesus  
 13 Christ had no choice but to be crucified,  
 14 and as he laid on the cross, he prophesied  
 15 that he would come again. He would come  
 16 again to host the holy wedding of the  
 17 land. And this means that as he laid on  
 18 the cross, Jesus did not fulfill his  
 19 responsibility; hence, he mentioned he  
 20 would come again.  
 21 Q Is Reverend Moon -- sorry -- Reverend  
 22 Sun Myung Moon, was he the only begotten son?  
 23 MR. HYUN OOK SUH: (Speaking Korean).  
 24 MS. ELI: Tell us what she said and  
 25 tell us your objection.

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1 MR. HYUN OOK SUH: She said (speaking  
 2 Korean); so that means only reverend is,  
 3 which is not the question.  
 4 Q Okay. Was Reverend Moon the only  
 5 begotten son?  
 6 A He was able to meet the only begotten  
 7 son in 6,000 years, and that's how he gained  
 8 that position. And in 1960, through holy  
 9 marriage, he became the True Parent.  
 10 MR. HYUN OOK SUH: Objection to that  
 11 interpretation.  
 12 Reverend Moon came as the only  
 13 begotten son, and he met the only begotten  
 14 daughter who came for the first time in  
 15 6,000 years. In 1960, through the holy  
 16 wedding, became the True Parents.  
 17 MR. ELDER: Objection. She used the  
 18 phrase, (speaking Korean). In other  
 19 words, that's translated because he met  
 20 the only begotten daughter --  
 21 MR. HYUN OOK SUH: Sure.  
 22 MR. ELDER: -- he became a True  
 23 Parent.  
 24 BY MR. POLAK:  
 25 Q Who is the only begotten daughter

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1 that you've been referring to?  
 2 A Myself, Han Hak Ja, who was born in  
 3 1943, is the only begotten daughter.  
 4 Q Are you familiar with the term  
 5 "denomination" in a religion?  
 6 A Yes, in Christianity.  
 7 MR. ELDER: Objection. She did not  
 8 say "yes." She -- did she say "yes"? I  
 9 didn't hear her say yes.  
 10 MR. HYUN OOK SUH: What is it?  
 11 Christianity?  
 12 MR. ELDER: She's asking a question  
 13 to the lawyer.  
 14 Q What is your definition of a  
 15 denomination?  
 16 MR. HYUN OOK SUH: Objection. She's  
 17 asking the meaning, but you're asking the  
 18 definition.  
 19 MR. POLAK: Yes.  
 20 A The Creator God created the world  
 21 based on his creation principles, and  
 22 everything exists as in plus and minuses or  
 23 male and female. And even in the animal  
 24 kingdom, there are male and female. And in the  
 25 human -- in humanity, created men and women.

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1 And he gave time for mankind to -- or men to  
 2 develop and grow, and during the time, the men  
 3 had to grow by being united with God or being  
 4 one with God.  
 5 And in order to bring about their  
 6 growth, there has to be absolute love, absolute  
 7 faith, and absolute submission. In order to  
 8 become the ancestors of all mankind, God has to  
 9 be with them, and that's what -- that's God's  
 10 plan.  
 11 MR. HYUN OOK SUH: Objection. I  
 12 would like to just interpret what  
 13 Mrs. Moon said. I've written down  
 14 everything.  
 15 God the Creator created humanity in  
 16 accordance with the principle of creation.  
 17 And according to the principle of  
 18 creation, God created everything in pairs,  
 19 plus and minus. In the plant world, we  
 20 have stamen and pistil. In the animal  
 21 world, we have male and female. God  
 22 created humanity as men and women.  
 23 And to human beings, God gave a  
 24 period of growth. During this period of  
 25 growth, there should be no self-awareness,

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1 in quotation, "selfishness," and human  
 2 beings should be absolutely one with God  
 3 in absolute love, absolute faith, and  
 4 absolute obedience.  
 5 After growing, they would receive the  
 6 blessing and become the True Parents, the  
 7 ancestors of humanity. In so doing, when  
 8 they become absolutely one with God, God  
 9 will live in communion with them. This  
 10 was God's dream and principle of creation.  
 11 MR. ELDER: Just an objection. At  
 12 the end there, God would live as the  
 13 Heavenly Parents, I believe she said,  
 14 (speaking Korean).  
 15 MR. HYUN OOK SUH: Right.  
 16 BY MR. POLAK:  
 17 Q When was the Unification Church  
 18 created?  
 19 A I would have to say in 1960 with a  
 20 True Parents as the center.  
 21 MR. ELDER: Objection. We must see  
 22 it as having been founded in 1960 centered  
 23 on the True Parents.  
 24 (Discussion held off the record.)  
 25 MR. POLAK: If we can go ahead and

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1 just turn off those external mics until we  
 2 get it figured out. Is that okay? I  
 3 don't think the security detail in the  
 4 other room should care too much about not  
 5 hearing it; so I'm gonna turn mine off.  
 6 MR. ROSENFELD: Those -- those are  
 7 the microphones.  
 8 (Discussion with IT personnel)  
 9 MR. POLAK: And that's what's causing  
 10 the problem up top. Thanks, Jim.  
 11 BY MR. POLAK:  
 12 Q So it's your belief that the Reverend  
 13 Moon did not start the Unification Church  
 14 first. It wasn't started until he married you.  
 15 A Yes, according to the providence.  
 16 MR. ELDER: Objection. That is the  
 17 providence.  
 18 Q In 1960, according to your testimony,  
 19 when the church was created, was there any  
 20 governing document that had rules about the way  
 21 in which the church was run, constitution or  
 22 bylaws or something like that?  
 23 MR. HYUN OOK SUH: Objection. She  
 24 said (speaking Korean), like a ideology,  
 25 theology. But what the lawyer asked is

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1 constitution and bylaws; so I'll interpret  
 2 that.  
 3 MR. ELDER: Objection.  
 4 MR. ROSENFELD: Can we go off the  
 5 record?  
 6 MR. POLAK: I'd rather keep going.  
 7 We can deal with this audio issue on a  
 8 break.  
 9 MR. ROSENFELD: Okay. All right.  
 10 We'll call you back. Thanks.  
 11 A After two people meeting together and  
 12 starting the providence, can you -- how can the  
 13 constitution be created all right away? It  
 14 takes time.  
 15 Q What I'm trying to understand,  
 16 Mrs. Moon, is whether there were any  
 17 organizational rules about the way in which the  
 18 church was run in 1960?  
 19 A In order to complete the will of  
 20 heavenly parents, the providence of heavenly  
 21 parents, it is imperative that there has to be  
 22 True Parents. So what should the True Parent  
 23 do?  
 24 MR. HYUN OOK SUH: Objection. With  
 25 regards to the completion of heavenly

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1 parents' providence, it is imperative that  
 2 True Parents be there. Therefore,  
 3 regarding falling human beings, what  
 4 should they do?  
 5 Q As I understood it, there presently  
 6 is a constitution called the Cheon Il Guk  
 7 Constitution that the Unification Church uses  
 8 for its business; is that correct?  
 9 A Yes.  
 10 Q That constitution was not adopted  
 11 until after the Reverend Moon died.  
 12 MR. HYUN OOK SUH: Objection.  
 13 That's -- she said that that constitution  
 14 was not -- it's the wrong interpretation.  
 15 If I may interpret.  
 16 MR. POLAK: Just state -- just state  
 17 your objection on what you think was said.  
 18 MR. HYUN OOK SUH: She said that  
 19 basically the constitution was not put in  
 20 effect until -- before Reverend Moon died.  
 21 THE INTERPRETER: May the interpreter  
 22 clarify that please?  
 23 MR. POLAK: Sure.  
 24 THE INTERPRETER: The interpreter has  
 25 interpreted adapted, not put in effect.

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1 MR. ELDER: Adopted -- I think the  
 2 lawyer said adopted.  
 3 MR. POLAK: Adopted.  
 4 THE INTERPRETER: Is that what you  
 5 said?  
 6 MR. POLAK: Yeah, yeah. Adopted, put  
 7 in effect, I use those two terms as  
 8 synonyms.  
 9 MR. HYUN OOK SUH: If I could  
 10 reinterpret what you said into Korean.  
 11 MR. POLAK: Okay. Well, let me --  
 12 let me read the question back. Can you  
 13 read the question back, have it  
 14 interpreted by the main interpreter? And  
 15 then if you have a different objection,  
 16 you can state it.  
 17 (Record read.)  
 18 MR. HYUN OOK SUH: She said "before,"  
 19 which is -- you said "after." So that's a  
 20 big difference in my opinion.  
 21 THE INTERPRETER: May the -- may the  
 22 interpreter correct something, please?  
 23 This -- many interpreters say not  
 24 until, not before.  
 25 MR. POLAK: Okay. Let me just start

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1 over with the question.  
 2 MR. ELDER: I'm sorry. I have to  
 3 agree with the check interpreter.  
 4 MR. POLAK: Okay. Let me -- let me  
 5 try to get -- let me ask a different  
 6 question. Maybe it'll translate better.  
 7 BY MR. POLAK:  
 8 Q What I'm trying to understand,  
 9 Mrs. Moon, is to confirm that the constitution  
 10 that you are referring to was not adopted until  
 11 after Reverend Moon had died.  
 12 MR. HYUN OOK SUH: She didn't say  
 13 "adopted."  
 14 A I completed it.  
 15 Q After he had died?  
 16 A Yes. After he died, I completed it.  
 17 Q When --  
 18 MR. ELDER: Just delete the word  
 19 "yes." Objection. She did not say "yes."  
 20 MR. HYUN OOK SUH: She did not say  
 21 yes.  
 22 Q When was the process started for the  
 23 creation of the Cheon Il Guk Constitution?  
 24 MR. ROSENFELD: Objection to form.  
 25 MR. HYUN OOK SUH: Objection. I

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1 think she says, "From when was the Cheon  
 2 Il Guk Constitution made?" And I think  
 3 that's quite different from when was the  
 4 process begun?  
 5 Q I'm trying to get at when -- when the  
 6 process started.  
 7 THE INTERPRETER: May the interpreter  
 8 actually ask something, please?  
 9 MR. POLAK: Yeah.  
 10 THE INTERPRETER: Because that's  
 11 exactly what I said, but, however, he  
 12 wants to put it in different ways. I  
 13 understand, but I would really ask --  
 14 would like to ask him to maybe ask -- wait  
 15 until how she answers because usually  
 16 the -- I mean, I don't understand how  
 17 other -- how else I can explain because he  
 18 seems to say the same thing in --  
 19 MR. POLAK: I think that's a good  
 20 suggestion that -- I think that's a good  
 21 suggestion. What we do is -- is withhold  
 22 our objections until the witness has  
 23 completed her answer, even if that  
 24 objection relates to the question itself.  
 25 And because otherwise I think what's gonna

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1 happen is that -- well, we're gonna really  
 2 bog down here. Let's give it a shot for a  
 3 little bit. If that doesn't work and you  
 4 don't think that that's workable and  
 5 doable, let's talk about it. Is that  
 6 fair?  
 7 MR. ROSENFELD: Yeah, I don't think  
 8 it's gonna work. I mean, if it's -- if  
 9 the question is misinterpreted, then she's  
 10 gonna be answering the wrong question.  
 11 MR. POLAK: It might be that it gets  
 12 ironed out in the wash, though, in terms  
 13 of what the actual answer is because it's  
 14 the answer and the testimony that is the  
 15 most important.  
 16 If it's just a yes or no, I would  
 17 agree with you that the question matters.  
 18 If it's a more substantive answer,  
 19 sometimes those answers are directly  
 20 responsive to questions, sometimes they're  
 21 tangential to the answer to the question.  
 22 Let's just see how it goes, and if -- but  
 23 if we do run into a problem on that and we  
 24 experience the type of issue you're  
 25 talking about, we're certainly happy to

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1 continue the conversation.  
 2 MR. ROSENFELD: Okay. So after  
 3 the -- after the answer, then you can  
 4 object to either the question or the  
 5 answer.  
 6 THE INTERPRETER: The only -- sorry.  
 7 The only reason that I'm asking is because  
 8 he and I -- I said the same thing, but  
 9 he's saying it in a different way. So  
 10 that's why I thought maybe in order to  
 11 move this -- facilitate this in a better  
 12 way --  
 13 MR. POLAK: Let's just -- let's just  
 14 try that for a little bit.  
 15 Could you read back the question  
 16 again, please?  
 17 (Record read.)  
 18 THE INTERPRETER: May the interpreter  
 19 ask the witness to -- to repeat that  
 20 answer, please? Because she did not -- it  
 21 was, like, so philosophical and  
 22 theological, she didn't understand.  
 23 A The planning started when we began as  
 24 a -- began as the True Parents in 1960.  
 25 Q So it took you almost 60 years?

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1 A Yes, 60 years.  
 2 MR. ROSENFELD: Do you have an  
 3 objection?  
 4 MR. HYUN OOK SUH: The objection was  
 5 that what Mother Moon mentioned before was  
 6 quite important, and I was thinking  
 7 whether you would like me to interpret  
 8 that.  
 9 MR. ROSENFELD: I mean, I do want to  
 10 state I think what we're doing now is -- I  
 11 know -- I know the way it's proceeding is  
 12 cumbersome. I think it's gonna be more  
 13 cumbersome, when I object to it, to not  
 14 have -- allow objections to the questions.  
 15 I think we're gonna go on a lot of false  
 16 starts and have a lot of answers to the  
 17 wrong questions.  
 18 Both sides have been objecting; so  
 19 there are a lot of legitimate corrections.  
 20 I think we should do the question, allow  
 21 an objection, do the answer, allow an  
 22 objection, as we started off doing.  
 23 MR. POLAK: I actually felt like  
 24 we're actually making progress over the  
 25 last three, four minutes, but we actually

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1 were moving faster. We haven't heard --  
 2 MR. ROSENFELD: I didn't hear a  
 3 translation of the whole speech that she  
 4 gave. I didn't hear a translation of what  
 5 the interpreter said originally. I need  
 6 to know what's going on in order to  
 7 object, and the -- you know, it's too much  
 8 to go by and then object after, and we're  
 9 gonna have a lot of false starts. I  
 10 really don't think we should do it that  
 11 way.  
 12 MR. POLAK: Well, just understand,  
 13 everything is a matter of timing, and I  
 14 think the judge anticipated that we would  
 15 get this done in ten hours --  
 16 MR. ROSENFELD: Yes.  
 17 MR. POLAK: -- because it was moving  
 18 quickly.  
 19 I don't feel that we're moving  
 20 quickly at all. Okay? We've been going a  
 21 little less than an hour, and I've barely  
 22 been able to get questions answered  
 23 probably to -- what? -- 15 questions.  
 24 MR. ROSENFELD: That's an error in  
 25 this process.

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1 MR. POLAK: Exactly.  
 2 MR. ROSENFELD: It could be worse if  
 3 we do it the way that you're suggesting.  
 4 MR. POLAK: Well, I just want it to  
 5 be very clear that if we get through this  
 6 and it continues to be an issue in terms  
 7 of the pace, I'll have no choice but to go  
 8 back to the judge and ask for more time.  
 9 And I would expect that we might need to  
 10 do that tomorrow at some point or sometime  
 11 this week because it seems like Mrs. Moon  
 12 is gonna be here for a while.  
 13 I just -- I'm not trying to --  
 14 MR. ROSENFELD: I mean, everybody is  
 15 being cooperative.  
 16 MR. POLAK: I'm just agreeing that  
 17 you are. I'm not disagreeing.  
 18 MR. ROSENFELD: Nobody is trying  
 19 to -- it's just a cumbersome process.  
 20 MR. POLAK: I agree.  
 21 MR. ROSENFELD: So, obviously, we  
 22 will strenuously oppose that.  
 23 MR. POLAK: I just want to -- on the  
 24 record, I want to --  
 25 THE INTERPRETER: Or maybe --

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1 MR. POLAK: Yeah, the interpreter has  
 2 a suggestion.  
 3 THE INTERPRETER: Yes, yes. The  
 4 interpreter can see already the gentleman  
 5 sitting over there is -- he knows exactly  
 6 how to interpret what Mrs. Moon is saying  
 7 because obviously he's been interpreting  
 8 for a very long time. And most of the  
 9 answers are very theological and -- which  
 10 the interpreter is not familiar with.  
 11 How about if he does -- because she's  
 12 gonna go on, this interpreter assumes,  
 13 this way of answering, do you mind if just  
 14 he becomes the main interpreter and the  
 15 interpreter becomes the check interpreter  
 16 to facilitate it?  
 17 MR. POLAK: We can't really do that.  
 18 That's the problem. Because I believe  
 19 you're a member of the church.  
 20 MR. HYUN OOK SUH: Right.  
 21 MR. POLAK: He is "quote" interested.  
 22 He would not be disinterested.  
 23 THE INTERPRETER: Okay.  
 24 MR. POLAK: And I don't think that we  
 25 can do that. It's not a comment on your

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1 abilities. It's just an issue of a  
 2 conflict of interest.  
 3 THE INTERPRETER: All right, Timothy.  
 4 Because my understanding is he's also --  
 5 MR. POLAK: He's stuck in the same  
 6 boat, yeah. So we wouldn't be able to do  
 7 that. Let's just keep on working.  
 8 THE INTERPRETER: Yes. Because this  
 9 interpreter can only -- things that she  
 10 does not know she can only translate  
 11 literally, and that may not be good enough  
 12 for the other interpreters.  
 13 MR. POLAK: I'm gonna circle back  
 14 around a bit on maybe some more direct  
 15 things.  
 16 BY MR. POLAK:  
 17 Q When did you meet the Reverend Moon?  
 18 A Early 1960.  
 19 Q How old were you?  
 20 A Seventeen.  
 21 Q You didn't meet when you were 11  
 22 years old?  
 23 A Well, it wasn't a meeting that  
 24 concerned the -- for the selection to become a  
 25 True Parent.

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1 Q Okay. Well, Mrs. Moon, I didn't ask  
 2 you when it is that you were selected as a True  
 3 Parent. What I asked you is when you actually  
 4 first met the Reverend Moon. And you were 11  
 5 years old at that time, weren't you?  
 6 A No, I can't recall whether I was 11  
 7 or -- or not because I met him with my mom.  
 8 MR. HYUN OOK SUH: Objection. She  
 9 said, "I met him following my mother, but  
 10 I cannot recall that I was 11 years old."  
 11 Q Well, you were younger than 17,  
 12 though, weren't you?  
 13 A I believe so.  
 14 Q After you met him, what happened?  
 15 A Well, he asked me what my name was,  
 16 and I gave him my name. And after hearing my  
 17 answer, he said -- he was thanking God, saying,  
 18 "Thank you, God, that" -- he was thanking God  
 19 that I was born in the great nation of Korea.  
 20 Q When was the next time that -- well,  
 21 first of all, how old was Mr. Moon --  
 22 Reverend Moon?  
 23 A I can't recall.  
 24 MR. HYUN OOK SUH: "I can't remember  
 25 exactly."

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1 MR. ELDER: I agree with -- I agree  
 2 with the check interpreter. "I do not  
 3 remember exactly."  
 4 MR. POLAK: I don't know that there's  
 5 a big difference between "I don't recall"  
 6 and "I don't remember exactly," but I  
 7 would just ask you to -- as check  
 8 interpreters, to look for things that are  
 9 important and material and let's not slow  
 10 things down with things that are not.  
 11 MR. ROSENFELD: Yeah, I agree. And  
 12 that's the agreement we came to in the  
 13 protocol that I think I showed you, that  
 14 if it's not important, we don't need to  
 15 object. If it's meaningful, you should  
 16 definitely continue to object.  
 17 MR. HYUN OOK SUH: Okay.  
 18 MR. ROSENFELD: Thank you.  
 19 MR. POLAK: And I'll leave it to you  
 20 to figure out what you think is important  
 21 and what's not. I'm not gonna argue with  
 22 you about that. I'm just asking you to  
 23 think about that as you make your check  
 24 objections.  
 25 MR. HYUN OOK SUH: Okay.

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1 BY MR. POLAK:  
 2 Q Do you remember what year you became  
 3 married to the Reverend Moon?  
 4 A March 16, 1960, in lunar year.  
 5 Q What happened between the date that  
 6 you met the Reverend Moon when you were younger  
 7 to the date that you became married to him?  
 8 A I mean, during the time, I was  
 9 studying; so there was no other meeting.  
 10 Q Prior to the date that you became  
 11 married to the Reverend Moon in 1960, had the  
 12 Reverend Moon already started the Unification  
 13 Church?  
 14 A Correct.  
 15 Q So the Reverend Moon was already the  
 16 leader of the Unification Church at that time.  
 17 A Correct.  
 18 Q Did he continue to be the leader of  
 19 the Unification Church all the way through the  
 20 date of his death?  
 21 A I mean, we were True Parents. He was  
 22 the True Father and I was the True Mother, and  
 23 I -- we were always together.  
 24 Q So you used the word "founders"  
 25 before. What did you mean by that?

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1 A The True Parents of the mankind who  
 2 will carry out the -- the purpose of creation  
 3 and God's providence; therefore, the ancestors  
 4 of mankind.  
 5 Q When you use the word "founders," are  
 6 you referring to you and the Reverend Moon as  
 7 founders of the Unification Church; that is,  
 8 you started it?  
 9 A Yes, you could say that.  
 10 Q But you already told me the  
 11 Reverend Moon started the Unification Church  
 12 before he married you.  
 13 MR. ROSENFELD: Objection to form.  
 14 Mischaracterizes.  
 15 A Well, the principle of Creator God's  
 16 creation is that, like I said before, man alone  
 17 cannot achieve the goal. And according to the  
 18 creation principal of God, there has to be man  
 19 and woman; therefore, that's why, when Jesus  
 20 came, he was a man and he had to come back.  
 21 He -- Pastor Moon may have been a  
 22 founder; however, until I appeared or I came --  
 23 until he met me, he had to strive forward. So  
 24 what I'm saying is he was not able to complete  
 25 the work by himself. Only after meeting me it

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1 was completed.  
 2 Q The Reverend Moon had had other wives  
 3 prior to marrying you; correct?  
 4 A Correct.  
 5 Q Was he married when he met you when  
 6 you were 11?  
 7 A No, he was divorced.  
 8 Q When you married the Reverend Moon,  
 9 do you recall how old he was?  
 10 A Forty.  
 11 Q Would you agree with me that at the  
 12 time that you were married to him,  
 13 Reverend Moon was running the Unification  
 14 Church, he was in control?  
 15 MR. ROSENFELD: Objection. Asked and  
 16 answered.  
 17 A Yes, I'd have to say that.  
 18 Q And that was true all the way up  
 19 until the day that he died; correct?  
 20 MR. ROSENFELD: Objection to form.  
 21 A Not by himself.  
 22 Q When did he stop controlling the  
 23 church by himself?  
 24 MR. ROSENFELD: Objection to form.  
 25 A How many times do I have to repeat

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1 it? I don't know how you cannot understand,  
 2 because I've been repeating it many times.  
 3 He alone could not complete the work.  
 4 So after meeting me, he was able to complete  
 5 the work.  
 6 MR. HYUN OOK SUH: Yeah, I think the  
 7 answer was a little different. Not  
 8 "complete the work," but after -- there  
 9 can be perfection. He could not complete  
 10 the work by himself. And after meeting  
 11 me, we began our work together as True  
 12 Parents.  
 13 Can I take a little break?  
 14 MR. POLAK: Yeah.  
 15 THE VIDEOGRAPHER: We're now off the  
 16 record. The time is 10:15 a.m. This ends  
 17 Tape No. 1.  
 18 (Recess taken.)  
 19 THE VIDEOGRAPHER: This marks the  
 20 beginning of Tape No. 2. We are now back  
 21 on the record. The time is 10:34 a.m.  
 22 BY MR. POLAK:  
 23 Q Mrs. Moon, I've used the term  
 24 "Unification Church" here today. Do you recall  
 25 that?

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1 A Yes.  
 2 Q I understand the Unification Church  
 3 presently goes by a different name called  
 4 Family Federation; is that correct?  
 5 A Yes.  
 6 Q Do you recall what year it was that  
 7 the Unification Church started using the term  
 8 "Family Federation"?  
 9 A I can't remember what year that was.  
 10 Q Do you have -- maybe you can't  
 11 remember the exact year, but could you give me  
 12 a range?  
 13 A Well, over 40 years ago.  
 14 Q So it was a name used by the  
 15 Unification Church while Reverend Moon was  
 16 alive?  
 17 A Correct.  
 18 Q Who came up with the name Family  
 19 Federation?  
 20 A It came from Creator God.  
 21 Q Do you prefer to identify your church  
 22 as the Family Federation or as the Unification  
 23 Church or as some other name?  
 24 A You mean presently?  
 25 Q Yes.

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1 A Well, it has ascended to the Family  
 2 Federation World Peace and Unification.  
 3 Q So if I use the term "Family  
 4 Federation," you understand what that means;  
 5 right?  
 6 A Yes.  
 7 Q And as I understand it, the Family  
 8 Federation Church has both an international  
 9 organization and then it also has organizations  
 10 in different countries that are separate.  
 11 A What do you mean? What are separate?  
 12 Q Meaning that they're -- they're under  
 13 the same name but they're run by different  
 14 presidents.  
 15 A Well, it's run by one person.  
 16 Q Who is that one person?  
 17 A True Parent.  
 18 Q Meaning you?  
 19 A Yes, of course.  
 20 Q So just so I'm clear in my  
 21 understanding, are you telling me that you are  
 22 the highest person of authority at the Family  
 23 Federation international church?  
 24 MR. ROSENFELD: Objection to form.  
 25 A Yes, of course.

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1 Q And are you also the highest person  
 2 of authority at the Family Federation USA?  
 3 MR. ROSENFELD: Objection to form.  
 4 A It's just in USA, but every country  
 5 that the organization is in, it's -- it's  
 6 around 200 countries. The organization is  
 7 registered under the name Family Federation  
 8 and/or Unification Church.  
 9 And God's -- Creator God's purpose of  
 10 creation was to -- to have family movement.  
 11 And the reason that mankind is waiting for the  
 12 Jesus Christ was -- was -- the reason that the  
 13 mankind was waiting for the Jesus Christ was to  
 14 restore the fallen families; therefore,  
 15 blessing the true families.  
 16 MR. HYUN OOK SUH: Objection. I just  
 17 want to correct her on the last portion.  
 18 Mother Moon mentioned that the reason  
 19 why fallen humanity was waiting for Jesus  
 20 as the savior and also the reason why  
 21 fallen humanity is waiting for True  
 22 Parents is to be born again and receive  
 23 rebirth through the True Family values.  
 24 Q So what I was asking you, Mrs. Moon,  
 25 is whether you are the highest person of

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1 authority at the US church. Is that what  
 2 you're telling me, that you are?  
 3 MR. ROSENFELD: Objection to form as  
 4 to "highest person of authority."  
 5 A If the Family Federation is in the  
 6 United States, live in the Creator God and also  
 7 in the True Parents, then who should be the  
 8 highest authority? The answer is the True  
 9 Parent.  
 10 Q So the answer to my question,  
 11 Mrs. Moon, is you are the highest person of  
 12 authority at the Family Federation USA.  
 13 MR. ROSENFELD: Same objection.  
 14 Confusing and misleading.  
 15 A I am the highest authority in the  
 16 United States, in the Great Britain, and in  
 17 France.  
 18 Q Are you familiar with the term  
 19 "providential organization" inside the Family  
 20 Federation Church?  
 21 A Yes, I am familiar.  
 22 Q What is a providential organization  
 23 inside the Family Federation Church? I'm not  
 24 asking you to give me -- give me the name of an  
 25 entity. I want an understanding of what that

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1 term means inside the church.  
 2 A Well, the responsibility of True  
 3 Parents is to fulfill God's dreams or  
 4 objectives and to also help realize the wishes  
 5 of fallen humanity.  
 6 And in order to save the fallen  
 7 humanity, True Parents have to help the mankind  
 8 become the True Sons and daughters of Creator  
 9 God. And through our church activities and  
 10 organizations and groups within the church,  
 11 we -- we engage in True Family movement.  
 12 MR. HYUN OOK SUH: Objection. I  
 13 think -- if I may give my version of the  
 14 interpretation.  
 15 The responsibility of True Parents is  
 16 to realize God's dream. And the wish of  
 17 fallen humanity -- the people who realize  
 18 the wish of fallen humanity are the True  
 19 Parents; therefore, True Parents have  
 20 founded various organization to help in  
 21 the salvation of fallen humanity.  
 22 In order to bring about the rebirth  
 23 of humanity as God's beloved sons and  
 24 daughters, True Parents have engaged in  
 25 these activities, whether church

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1 activities, or all organizations are  
 2 engaged in the True Family values  
 3 movement, whether in politics or in  
 4 religion.  
 5 Q Are you familiar with the New Yorker  
 6 Hotel?  
 7 A Yes.  
 8 Q Does the church have a providential  
 9 organization around the ownership and the  
 10 management of The New Yorker Hotel?  
 11 MR. ROSENFELD: Objection to form.  
 12 MR. HYUN OOK SUH: Objection. She  
 13 omitted "ownership and management," which  
 14 I think is essential.  
 15 A I cannot answer that question in one  
 16 sentence.  
 17 Q Can you answer it in two?  
 18 A What do you mean? How?  
 19 Q All I'm wanting to know is whether or  
 20 not you consider The New Yorker Hotel to be a  
 21 part of a providential organization of the  
 22 church.  
 23 A Not just The New Yorker Hotel. Any  
 24 other organizations that are under the  
 25 ownership of the Family Federation there for

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1 the USA. And not only for USA; there for the  
 2 world.  
 3 Q And so these providential  
 4 organizations also are controlled by you as  
 5 True Parent?  
 6 MR. ROSENFELD: Objection to form.  
 7 A I'm trying to answer that question by  
 8 giving you an example about the Catholic  
 9 church.  
 10 There's a Pope in Rome, and there are  
 11 cardinals in different countries. Then --  
 12 well, would the Pope in Rome be micromanaging  
 13 each cardinal? No. They're delegated with  
 14 their responsibilities.  
 15 Q When the Reverend Moon was alive, did  
 16 people refer to him as the "Heavenly Father"?  
 17 MR. HYUN OOK SUH: Objection. It's  
 18 not Cheon Il Guk. She said "the father of  
 19 heaven," which is a little bit different  
 20 in our theology.  
 21 A I don't know if anyone had called him  
 22 the heavenly father. He was just referred to  
 23 as the True Father.  
 24 MR. HYUN OOK SUH: And True Parents.  
 25 A And I would be heavenly mother, if

1 that's the case.  
 2 Q Well, my question is, do you recall  
 3 hearing people refer to the Reverend Moon as  
 4 heavenly father?  
 5 A No.  
 6 Q You had referred to him as True  
 7 Father?  
 8 A Well, he was my husband.  
 9 Q So is the answer, yes, that people  
 10 would refer to him as True Father?  
 11 MR. ROSENFELD: Objection to form.  
 12 A Well, it was each people's own  
 13 discretion. Some people referred to him like  
 14 that, and some other called him reverend.  
 15 Q Could Reverend Moon have been the  
 16 heavenly father if he had married anyone else  
 17 other than you?  
 18 A No.  
 19 MR. ROSENFELD: Objection to  
 20 "heavenly father" in that question.  
 21 Q What does it mean to be True Mother?  
 22 A It refers to a parent, a mother who  
 23 can restore the fallen mankind to the state  
 24 prior to the fall, and, therefore, without me,  
 25 the blessing ceremony or -- would not exist.

1 Q We talked before about HSA USA.  
 2 We've also referred to it as the Family  
 3 Federation USA. Do you know what I'm talking  
 4 about there?  
 5 A Yes.  
 6 Q And you understand that Family  
 7 Federation USA has a president, Mr. Dunkley?  
 8 A Uh-huh.  
 9 Q Is that a yes?  
 10 A Yes.  
 11 Q Did you appoint Mr. Dunkley to that  
 12 position of presidency for HSA USA?  
 13 A That's correct.  
 14 Q There were other -- there have been  
 15 other presidents in the past of HSA USA as  
 16 well; correct?  
 17 A Well, prior to that time, the  
 18 decision was made -- decisions were made or --  
 19 THE INTERPRETER: May the interpreter  
 20 ask Mrs. Moon to clarify something,  
 21 please?  
 22 MR. POLAK: Yes.  
 23 A Prior to that time, Reverend Moon and  
 24 I always thought alike; therefore, we appointed  
 25 based upon our mutual agreement.

1 MR. HYUN OOK SUH: I'm sorry. She  
 2 said "prior to that time," which is not  
 3 correct.  
 4 Mrs. Moon mentioned while  
 5 Reverend Moon was alive, which I think is  
 6 a big difference.  
 7 Q Okay. So the president of HSA USA  
 8 before the Reverend Dunkley was Reverend  
 9 Buessing. Did you appoint Reverend Buessing as  
 10 president?  
 11 A Yes, I did.  
 12 Q And before him was a Dr. Balcomb.  
 13 Did you appoint Dr. Balcomb?  
 14 A Yes.  
 15 Q You understand that HSA USA also has  
 16 a board of directors?  
 17 A Yes.  
 18 Q Do you appoint those directors to the  
 19 board?  
 20 A Well, the board members are selected  
 21 based on various opinions in the USA, and the  
 22 candidate -- they were picked from various  
 23 candidates.  
 24 MR. HYUN OOK SUH: I object. I think  
 25 that was a poor translation.

1 Basically the members of Family  
 2 Federation USA collect their opinions, and  
 3 under the agreement from the members,  
 4 these candidates are selected.  
 5 Q So you're telling me that you do not  
 6 tell HSA USA who to put on their board?  
 7 MR. ROSENFELD: Objection to form.  
 8 A That's correct.  
 9 Q What about removal of board members  
 10 at HSA USA? Do you make the decision on when a  
 11 board member should be removed?  
 12 THE INTERPRETER: Well, may the  
 13 interpreter ask Mrs. Moon what the subject  
 14 of her sentence --  
 15 MR. POLAK: Yes.  
 16 A There's an appointed person who are  
 17 in charge such as Mrs. -- Mrs. Duncan  
 18 (phonetic) -- Dunkley.  
 19 MR. ROSENFELD: Mr. Dunkley.  
 20 THE INTERPRETER: Mr. Dunkley.  
 21 Sorry.  
 22 A And the responsibility is delegated  
 23 to Mr. Dunkley. There are many, many  
 24 countries, and I cannot micromanage every  
 25 organization.

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1 Q How is it that you communicate with  
 2 HSA USA?  
 3 A The only order that I gave to HSA USA  
 4 was that all the families in the Unification  
 5 Church have to be blessed family and -- and  
 6 become the tribal messiah.  
 7 MR. HYUN OOK SUH: Objection. She  
 8 did not translate correctly. Mother Moon  
 9 did not say "the only."  
 10 The order I gave to all members,  
 11 blessed families of the Unification Church  
 12 in the United States was to become tribal  
 13 messiahs, and the person in charge of  
 14 America needs to only do that.  
 15 A While my order was basically to  
 16 become the families that can be -- that God can  
 17 embrace, the blessing doesn't -- shouldn't just  
 18 stay within the family. It has to go outside  
 19 of the family, outside of the environment.  
 20 Q Mrs. Moon, I--  
 21 MR. HYUN OOK SUH: Objection. She  
 22 didn't interpret the whole sentence. She  
 23 read, I think, half of it.  
 24 And the order I give to the Family  
 25 Federation USA was that the blessing

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1 should not just remain one's own blessing.  
 2 It needs to be multiplied, and we need to  
 3 expand our environment. And through the  
 4 True Family values movement, we can become  
 5 the children of God who God can embrace,  
 6 and we need to do our very best to fulfill  
 7 this mission. This is the order I gave.  
 8 Q I'm not talking about specific  
 9 orders. I'm asking you about the process of  
 10 how it is that you communicate with either  
 11 Reverend Dunkley or with members of the board.  
 12 How do you go about doing that if you  
 13 want to tell the board or the president  
 14 something?  
 15 A Well, I -- I receive reports through  
 16 mission headquarters.  
 17 Q Are these written reports?  
 18 A Yes, I would say that -- written  
 19 reports and --  
 20 Q What about oral reports?  
 21 A Based on need.  
 22 MR. ROSENFELD: Excuse me?  
 23 THE INTERPRETER: Based on need.  
 24 Q Who prepares the written reports?  
 25 A What do you mean? These are reports

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1 coming from the local organizations. So what  
 2 do you mean, who prepares them?  
 3 Q Okay. So, for example, if HSA USA --  
 4 well, scratch that question. I'm sorry. Let  
 5 me start over.  
 6 Are you telling me that HSA USA sends  
 7 you written reports on their activities?  
 8 A Yes, I would say that.  
 9 Q Does that mean that those reports  
 10 come from Reverend Dunkley or from Dr. Kim or  
 11 from somebody else?  
 12 A Yes, through Mr. Dunkley and Mr. Kim.  
 13 Mr. Kim is in charge of the USA chapter.  
 14 Q So Mr. Kim is in charge of the United  
 15 States church? So let me -- let me scratch  
 16 that question.  
 17 So Mr. Kim is responsible for getting  
 18 these reports to you from the United States?  
 19 A Yes.  
 20 Q Are these reports that are written  
 21 given to you on a computer or, like, a piece of  
 22 paper?  
 23 A I mean, by paper documents or via  
 24 Internet, all the advance technologies used for  
 25 communication.

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1 Q Do you have an E-mail address?  
 2 A No.  
 3 Q Can people send you an E-mail if  
 4 someone else reads it for you?  
 5 A Yes.  
 6 Q Do you know what that E-mail address  
 7 is?  
 8 A I do not.  
 9 Q If I wanted to send you an E-mail and  
 10 I asked you, "How do I send you an E-mail?"  
 11 What would you tell me?  
 12 A I would say to send it to my  
 13 secretary.  
 14 Q And what's your secretary's name?  
 15 A Won Ju Chong.  
 16 Q How often do you get reports from HSA  
 17 USA?  
 18 A I mean, I'm in charge of more than  
 19 six continents. It's not just USA.  
 20 Q I understand that. I'm only asking  
 21 you about HSA USA.  
 22 A I mean, it varies; so I cannot give  
 23 you the number. It could be every day or once  
 24 every 15 days; so I can't give you the answer.  
 25 Q Okay. Do you meet regularly with

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1 Mr. Kim, the continental director for HSA USA,  
 2 on a regular basis?  
 3 MR. ROSENFELD: Objection to form.  
 4 A Yes, at least four times a year. We  
 5 meet regularly.  
 6 Q Is that in person?  
 7 A Yes, in person.  
 8 Q At those meetings, do you talk HSA  
 9 USA business?  
 10 MR. HYUN OOK SUH: Business in  
 11 Korean -- I object because I would say  
 12 (speaking Korean). It's more, like, the  
 13 work rather than business. Because if you  
 14 translate business into Korean, it means  
 15 economic business.  
 16 MR. POLAK: Okay.  
 17 Q I'm not -- I'm not talking about  
 18 economic business. I'm talking about work.  
 19 A Yes, I receive reports from him.  
 20 Q During those -- and are those written  
 21 reports that he provides you?  
 22 A No. I receive -- the  
 23 four-times-a-year meeting that I mentioned was  
 24 a meeting where all the presidents from all  
 25 continents of the world come together.

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1 MR. HYUN OOK SUH: And I received  
 2 their reports together.  
 3 MR. ELDER: Objection. She did not  
 4 say "presidents." She's referring to the  
 5 continental directors, meaning one -- one  
 6 person from each continent.  
 7 Q During these reports, are they  
 8 providing you something in writing, or is it  
 9 all oral?  
 10 MR. HYUN OOK SUH: I'm sorry. She  
 11 said "whether they write reports and give  
 12 it to her," but she omitted the oral part,  
 13 if I could mention that. (Speaking  
 14 Korean)  
 15 A It's oral report.  
 16 Q Those types of four-times-a-year  
 17 meetings with the continental directors,  
 18 including Mr. Kim, have occurred all the way  
 19 back since the time that Reverend Moon died;  
 20 right?  
 21 A Yes, you could say that.  
 22 Q During that period, from the date  
 23 that Reverend Moon died to today, at these  
 24 meetings with the continental directors, has  
 25 the Sanctuary Church ever been discussed?

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1 A No.  
 2 Q Why not?  
 3 A After the True Father died, I told  
 4 Hyung Jin to wait for three years. Based on  
 5 the opinions of myself and also the blessed  
 6 families, Hyung Jin needed to -- Hyung Jin was  
 7 not adequate. He needed to grow and learn, and  
 8 he did not recognize the providential --  
 9 providence of -- providence of God and also of  
 10 the True Parents. So in order to provide him  
 11 time to study, I asked him to wait for a few  
 12 years. I told him to stop -- stop his  
 13 involvement with the organization, and I told  
 14 him to study for three years. I told him that  
 15 I was going to show him how he can go toward  
 16 one word under God.  
 17 MR. HYUN OOK SUH: I have objections.  
 18 The first part is -- she used the  
 19 word "adequate," which is not a correct  
 20 interpretation.  
 21 What Mother Moon says, "In my  
 22 opinion, in the opinion of blessed  
 23 families, Hyung Jin was immature. He  
 24 needed to grow and he needed to learn. He  
 25 doesn't understand True Parents'

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1 providence and he doesn't understand  
 2 heaven's providence. He needed to study  
 3 more. That is why I asked him to wait for  
 4 three years. I asked him to step down  
 5 from all positions and study for  
 6 three years."  
 7 And what she just added right now is,  
 8 I will show him how to reach one world  
 9 under God.  
 10 MR. POLAK: I would object to that as  
 11 being nonresponsive.  
 12 Q Do you have more of your -- do you  
 13 have more answer you want to give, Mrs. Moon?  
 14 A Okay. Then maybe I didn't  
 15 understand, like, what the point of the  
 16 question is -- was.  
 17 Could you ask the question again,  
 18 please?  
 19 Q Yes. I'm not asking you  
 20 conversations that you had with Sean Moon yet.  
 21 My question related to these four-times-a-year  
 22 meetings with the continental directors.  
 23 And I asked you whether Sanctuary  
 24 Church had been discussed at any time during  
 25 these meetings since the Reverend Moon's death,

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1 and you told me no.  
 2 And so I followed that up and I asked  
 3 you, "Well, why had you not had any  
 4 conversations at those continental director  
 5 meetings about Sean Moon?" Was it just not a  
 6 topic that you chose to discuss?  
 7 A Because he was not mature. That's  
 8 why it was not discussed. I told him to wait  
 9 for three years, and I thought he was gonna  
 10 grow during -- in that time. I gave him time.  
 11 Q Are you familiar with the events at  
 12 Sanctuary Church in February of 2018 concerning  
 13 a publicized blessing event involving firearms?  
 14 A Yes, I heard about it.  
 15 Q How did you hear about it?  
 16 A Through my secretary.  
 17 Q And it's your recollection that that  
 18 event was never discussed at this -- or these  
 19 continental director meetings?  
 20 MR. ROSENFELD: Asked and answered.  
 21 A Well, it was not important enough to  
 22 discuss about it, and I said it was -- the USA  
 23 should take care of it by itself.  
 24 MR. HYUN OOK SUH: I object. There's  
 25 a difference, in my opinion, between "not

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1 important enough" and Mother Moon said  
 2 there was "no value to discussing it."  
 3 Q Did you have any conversations with  
 4 Mr. Kim, the continental director, separately  
 5 about the February 2018 event?  
 6 A Well, the substance of our discussion  
 7 was -- is that there -- the providence of True  
 8 Parent existed for 40 years in the United  
 9 States. And the Family Federation of USA was  
 10 going in the wrong direction, and just because  
 11 he's my son, should I just overlook -- overlook  
 12 it?  
 13 MR. HYUN OOK SUH: I object. I think  
 14 it's a fundamentally different  
 15 interpretation.  
 16 She did not say "the substance of our  
 17 discussion." And what she said was,  
 18 "After receiving the report I mentioned,  
 19 that this is the shame of America. For  
 20 40 years there was a providence, and this  
 21 is meaning True Parents have engaged in a  
 22 providence for 40 years in America. And  
 23 how is it possible that even though my son  
 24 is walking the wrong path or walking the  
 25 path that shouldn't be walked, Family

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1 Federation can stay idle and just watch?"  
 2 Q So that was a discussion you had with  
 3 Mr. Kim?  
 4 A It was not a discussion. I said it  
 5 should be corrected by the USA federation.  
 6 Q Okay. So I'm trying to determine the  
 7 actual conversation you had with Mr. Kim.  
 8 What is it the two of you spoke about  
 9 concerning that February 2018 --  
 10 A I'm the True Parent and True Mother  
 11 of the mankind, and I'm the true mother who  
 12 reveals the truth of heavenly providence and  
 13 also the truth about the history.  
 14 The mankind -- the entire 7.6 billion  
 15 are my children, and I'm the formal True  
 16 Parent.  
 17 MR. HYUN OOK SUH: I'll object. "I  
 18 am the public True Parent."  
 19 A And I cannot just sit idle just  
 20 because he's my son when he's going the wrong  
 21 way. There's no successor to the True Parent.  
 22 There can only be central figures who the True  
 23 Parent acknowledges. Well the theologies that  
 24 he's the second leader.  
 25 MR. ELDER: Objection. She said

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1 "founder."  
 2 A So there cannot be a successor. The  
 3 True Parent is permanent.  
 4 MR. HYUN OOK SUH: No, I object.  
 5 Yeah, there's only one eternal True  
 6 Parent. There is no successor.  
 7 Q Is it your understanding that  
 8 Reverend Moon believed that, that there could  
 9 be no successor?  
 10 A Well, it cannot -- well, a successor  
 11 cannot be determined. If there can be a  
 12 successor, then it would be the True Mother.  
 13 MR. HYUN OOK SUH: So, sorry, the  
 14 successor cannot be decided. If there  
 15 were one, it would be True Mother.  
 16 Q Did Reverend Moon appoint Sean Moon  
 17 as his successor before Reverend Moon died?  
 18 A I didn't say appoint -- appoint. He  
 19 is still not mature. He has to grow. And you  
 20 can -- it's impossible for a success -- it's  
 21 not possible that there is a successor.  
 22 And he can be a central figure;  
 23 however, there has to be an agreement -- mutual  
 24 agreement between the True Mother and True  
 25 Father. True Father alone cannot decide. None

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1 on my sons I would consider as mature.  
 2 Or if there are people from the  
 3 blessed families who uphold to the traditions  
 4 of the True Parent, then -- and who also  
 5 practices true love, then I can appoint that  
 6 person as the central figure.  
 7 MR. HYUN OOK SUH: Objection. She  
 8 didn't say "I can appoint." She said,  
 9 "They can be appointed as central  
 10 figures."  
 11 Q I want to go back to what we were  
 12 talking about a little bit ago, about the  
 13 conversation that you had with Mr. Kim about  
 14 the Sanctuary Church in February of 2018.  
 15 MR. ROSENFELD: Can you repeat the  
 16 question, please? Can you read it back?  
 17 (Record read.)  
 18 MR. ROSENFELD: Objection.  
 19 Mischaracterizes.  
 20 A Okay. Go ahead.  
 21 Q Did you basically tell Mr. Kim to do  
 22 something about this?  
 23 MR. ROSENFELD: Objection to form.  
 24 A I instructed him to educate my son,  
 25 who was -- who was acting in his greed and --

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1 and illogically, because all the blessed  
 2 families were -- were working as -- working  
 3 united as one in order to achieve the purpose  
 4 of Creator God's purpose of creation, and all  
 5 of the blessed families were committed to  
 6 working to act as the tribal messiahs.  
 7 MR. HYUN OOK SUH: Objection. I  
 8 object to her interpretation. If I could  
 9 just offer mine.  
 10 All blessed families in the United  
 11 States are united as one with True Parents  
 12 and, in order to accomplish God's purpose  
 13 of creation, are doing their very best to  
 14 become heavenly tribal -- fulfill their  
 15 mission as heavenly tribal messiahs.  
 16 However, this son, who is motivated  
 17 by self-centeredness or greed and engaging  
 18 in nonsensical activities, I asked that he  
 19 be educated.  
 20 Q What do you mean by "educated"?  
 21 A It meant do not insist on the way --  
 22 there was -- on something that's not the way.  
 23 Well, he has to be one with his -- he  
 24 has to be one with the mother to live -- if he  
 25 rejects the mother, then he -- there is no way

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1 for him. In the Bible, it says if you reject  
 2 the Messiah, it can be forgiven, but if you  
 3 reject the Holy Spirit, it cannot be forgiven.  
 4 And my son was going toward destruction.  
 5 MR. HYUN OOK SUH: I object to that  
 6 translation, and I also object to the  
 7 translation before.  
 8 What Mother Moon mentioned is do not  
 9 persist in walking along what is not the  
 10 path, and there can be no son who denies  
 11 his own mother. It is written in the  
 12 Bible, "He who speaks against the Messiah  
 13 can be forgiven; however, he who speaks  
 14 against the Holy Spirit cannot be  
 15 forgiven."  
 16 We live in the last days; therefore,  
 17 he needs to unite together with the mother  
 18 and live in unison with the mother. If he  
 19 ignores the mother, then there will be no  
 20 path for him to go.  
 21 Q Did you authorize the filing of the  
 22 lawsuit by HSA USA against Sanctuary Church?  
 23 A Well, I didn't know about it. I only  
 24 found out recently -- recently that I had to  
 25 come to this proceeding.

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1 Q What do you understand that this  
 2 lawsuit is about?  
 3 A My understanding is that it concerns  
 4 trademark infringement.  
 5 Q Do you know what trademark  
 6 infringement is?  
 7 A Well, I -- I don't know how US law  
 8 works.  
 9 Q Do you have an understanding, though,  
 10 without being a lawyer what trademark  
 11 infringement is?  
 12 A No, I don't understand.  
 13 Q Do you know what the trademarks are  
 14 that are at issue in this lawsuit?  
 15 A It's the trademark created by the  
 16 True Parent.  
 17 MR. HYUN OOK SUH: I think she meant  
 18 the symbol created by True Parents, not  
 19 the trademark.  
 20 Q I think it goes by either the name  
 21 Tongil or 12 Gates?  
 22 A Correct.  
 23 Q Do you, as True Mother, object to  
 24 sanctuaries' use of the Tongil symbol?  
 25 A It's not a church I recognize; so

1 they shouldn't use it.  
2 Q Why is that?  
3 A Without the owner's approval, it's  
4 not allowed. Okay. Let's say if you insist  
5 something is yours and if somebody misused it,  
6 then would you just sit back and do nothing?  
7 MR. HYUN OOK SUH: I object. I think  
8 the translation -- I think -- I would like  
9 to reinterpret it.  
10 You cannot use it without -- what she  
11 said exactly, verbatim, is you cannot use  
12 it without the owner's consent. If you  
13 own something, you cannot use it anyhow  
14 without the owner's permission.  
15 Q Do you have an understanding as to  
16 why Sean Moon and Sanctuary Church believe they  
17 are allowed to use the Tongil symbol?  
18 MR. ROSENFELD: Objection. Lack of  
19 foundation.  
20 A Well, that's something I don't  
21 understand. Logically, it's difficult to  
22 understand. Even if he is a wise person, I  
23 can't understand. It doesn't -- that act  
24 doesn't have any future.  
25 MR. HYUN OOK SUH: I'm sorry. I

1 object. She did not say "even if he's a  
2 wise person, I don't understand this."  
3 Even a wise person wouldn't  
4 understand this. This is an act without a  
5 future.  
6 A Well, the True Parents have been  
7 committed to bring about one -- or united world  
8 and peaceful world.  
9 MR. HYUN OOK SUH: Sorry. She did  
10 not interpret everything that Mother said.  
11 True Parents have invested their  
12 entire lives into the realization --  
13 THE COURT REPORTER: I'm sorry. I  
14 need you to slow down.  
15 MR. HYUN OOK SUH: Okay. Sure.  
16 True Parents have invested their  
17 entire lives to realizing a unified world,  
18 a world of piece. They've invested  
19 everything to realize one unified world.  
20 A There cannot be two branches.  
21 Q I'm not asking you whether you agree  
22 with Sean Moon. I'm asking you whether you  
23 know what Sean Moon bases his argument that  
24 he's entitled to use the Tongil symbol at the  
25 Sanctuary Church.

1 MR. ROSENFELD: Same objection.  
2 A I do not.  
3 Q You don't have any idea on what basis  
4 it is that Sanctuary Church thinks it is  
5 permitted to use the Tongil symbol?  
6 MR. ROSENFELD: Same objection.  
7 Asked and answered.  
8 MR. HYUN OOK SUH: I'm sorry. Just  
9 one objection.  
10 She mentioned that he received  
11 permission. You didn't mention he  
12 received permission.  
13 A I said I don't know. I mean, tell me  
14 if you know.  
15 Q We'll get to that, Mrs. Moon. Right  
16 now I'm just asking you what it is you know.  
17 Do you appoint the board members for  
18 the Washington Times?  
19 A Washington Times?  
20 Q I thought it was Washington Times.  
21 MR. ROSENFELD: Yes.  
22 Q Yeah.  
23 A I mean, there's no way I know about  
24 everybody, and I don't know about everyone. If  
25 there's a suggestion -- if a suggestion comes

1 to me about someone, then -- and -- and saying  
2 that there's -- this person so and so, then I  
3 said, okay, then I'll do it.  
4 MR. HYUN OOK SUH: Objection. I just  
5 want to add one very important point, and  
6 this is my interpretation.  
7 "I do not know everything; however,  
8 if a suggestion comes that this person or  
9 that person is appropriate and I receive  
10 an explanation for it, then I give my  
11 consent. I cannot know everything."  
12 Q Do you require absolute loyalty to  
13 you from all board members of providential  
14 organizations?  
15 MR. HYUN OOK SUH: Sorry. I think  
16 she said "do you expect," but I think  
17 you -- you mentioned -- you asked, you  
18 know --  
19 MR. POLAK: Well, let me -- let me  
20 rephrase the word because I see how that  
21 could get confusing in the interpretation.  
22 Q Do you require absolute loyalty from  
23 all persons appointed as board members for  
24 providential organizations?  
25 A You have to trust the people who are

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1 appointed position of public responsibility.  
 2 Q Did you, Mrs. Moon, as True Mother,  
 3 require absolute loyalty from those persons  
 4 whom you appoint to board positions at  
 5 providential organizations?  
 6 A Well, I don't require it. I don't  
 7 require it. However, they voluntarily -- they  
 8 volunteer in doing so. And if you can -- I'm  
 9 sure if you can educate yourself, you'll find  
 10 some things about it too.  
 11 MR. HYUN OOK SUH: Well, I object.  
 12 What Mother Moon said is that "I do  
 13 not require loyalty. They volunteer to be  
 14 loyal. And if you study the Divine  
 15 Principal, you would understand."  
 16 THE INTERPRETER: May the interpreter  
 17 ask for something, please? Because she  
 18 doesn't mention, like, loyalty when  
 19 answering that, like Koreans do not  
 20 answer. That's why.  
 21 And this interpreter is reluctant to  
 22 say -- put words, like, to point cross  
 23 dots -- connect the dots. But at some  
 24 point, the check interpreter actually as  
 25 himself and sometimes he fights -- if this

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1 interpreter says it, he rejects the  
 2 answer.  
 3 So I just wanted to ask the check  
 4 interpreter, would it be okay -- because  
 5 this interpreter understand that you have  
 6 to have an object like loyalty, but she  
 7 didn't actually mention those. So maybe  
 8 the check interpreter can give me some  
 9 room --  
 10 MR. POLAK: I think what we have to  
 11 do is just continue on with the process  
 12 where you do the best that you can do, and  
 13 then that's why these guys are here as  
 14 check interpreters, to sort of check.  
 15 I think from time to time there will  
 16 be objections. It's not personal. It  
 17 doesn't mean that anybody is a bad person  
 18 or a bad interpreter. It just means  
 19 that -- that there might be a difference  
 20 of understanding, and then we lawyers will  
 21 work it out later. Is that fair enough  
 22 for everybody? All right.  
 23 I, however, forgot the last question.  
 24 Could you -- could you go back and tell me  
 25 what the last question was, please?

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1 (Record read.)  
 2 Q Did you -- or, sorry.  
 3 Do you require absolute obedience  
 4 from members of the board of directors for  
 5 providential organizations? And when I say  
 6 "absolute obedience," I mean absolute obedience  
 7 to you as True Mother.  
 8 MR. ROSENFELD: Asked and answered.  
 9 A Well, like I said -- like I said  
 10 before, it is -- they have their free will. I  
 11 do not encourage them.  
 12 MR. HYUN OOK SUH: I'm sorry. Just I  
 13 want to change one thing. She didn't say  
 14 their "free will." It is their freedom,  
 15 it is their freedom.  
 16 Q So is it your view, Mrs. Moon, that  
 17 directors of the board of directors of  
 18 providential organizations are free to disagree  
 19 with you on matters that are important to the  
 20 organization?  
 21 A Yes.  
 22 Q Is there a penalty to be paid for  
 23 those that disagree with you on the boards?  
 24 A No.  
 25 Q Are you familiar with an individual

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1 named Jonathan Park?  
 2 MR. HYUN OOK SUH: I'm sorry. She  
 3 used "(speaking Korean)," which is  
 4 punishment, and that's different from  
 5 penalty.  
 6 MR. POLAK: I don't look at those two  
 7 things as different. But if there's a  
 8 translational issue, you can ask her if  
 9 her answer would be different based on  
 10 punishment.  
 11 A No, there's no penalty; however, I  
 12 do -- I spend some time to reflect on that to  
 13 try to figure out how that opposite answer --  
 14 how they answered it that way.  
 15 Well, since I'm True Mother, I am  
 16 giving time to the son whom I cannot understand  
 17 concerning his actions.  
 18 MR. HYUN OOK SUH: Yes, I'd just like  
 19 to object to what was mentioned before. I  
 20 think it's important.  
 21 "I take the time on matters that I do  
 22 not understand. Why was such an opinion  
 23 put forward or why was such -- why was  
 24 there such an opinion? And because I'm  
 25 the True Mother, if there is a son that I

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1 do not understand, I give him the time so  
 2 that I can understand him."  
 3 MR. ELDER: I object. I have a  
 4 different translation on the very last  
 5 sentence.  
 6 "If there is a son who does not  
 7 understand, I give him time to  
 8 understand."  
 9 Q Have you ever removed a director on a  
 10 board of directors for a providential  
 11 organization because that person disagreed with  
 12 you?  
 13 A Well, the people who are in charge of  
 14 the providential organizations, they understand  
 15 the providence; therefore, there cannot be  
 16 different opinions.  
 17 Well, there's only one way to -- I  
 18 mean, there's only one way to heaven, and  
 19 that -- a True Mother knows the way to heaven;  
 20 so you have to be connected to the mother in  
 21 order to get to heaven. Therefore, they do not  
 22 object.  
 23 MR. HYUN OOK SUH: I object.  
 24 What -- my understanding of what  
 25 Mother Moon mentioned is that the way to

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1 the Kingdom of Heaven is but one. There  
 2 can be -- there is only one way.  
 3 And the leaders, in quotations,  
 4 understand that they need to connect with  
 5 True Mother. Unless they do so, they can  
 6 not leave, and that is why there's no  
 7 opposing.  
 8 Q So the answer to my question then is,  
 9 yes, you have removed board members from  
 10 providential organizations due to disagreement?  
 11 MR. ROSENFELD: Objection.  
 12 Mischaracterizes.  
 13 A You can't twist my answer like that.  
 14 The persons who are appointed to the position  
 15 of responsibility for the people who are aware  
 16 of the providence of True Parents; so how can a  
 17 person who doesn't know the providence of True  
 18 Parents become -- be appointed to the position  
 19 of responsibility?  
 20 Hyung Jin didn't understand the  
 21 providence of a True Mother; therefore, I gave  
 22 him three years and to -- I told him to wait.  
 23 MR. ELDER: Object to the extent she  
 24 does not know the True Mother, not the  
 25 providence of the True Mother.

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1 MR. ROSENFELD: Jonathan, when you  
 2 get to a stopping point, can we take a  
 3 break?  
 4 MR. POLAK: I'm not quite to a  
 5 stopping point, but I will.  
 6 Q What I'm trying to understand,  
 7 Mrs. Moon, is whether or not you have ever  
 8 directed that a board of director member be  
 9 terminated from that position out of disloyalty  
 10 or disagreement with you.  
 11 A No.  
 12 Q Are you familiar with a person named  
 13 Jonathan Park?  
 14 A You mean Chin Son [sic] Park? Yes, I  
 15 do know.  
 16 MR. HYUN OOK SUH: That's his Korean  
 17 name.  
 18 MR. POLAK: Korean name? Okay.  
 19 Thank you.  
 20 Q Jonathan Park was on the board of  
 21 directors for HSA USA; right?  
 22 A Yes.  
 23 Q And you put him there. You appointed  
 24 him to be on that board; correct?  
 25 A Correct.

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1 Q And you also instructed that he be  
 2 removed from the board; correct?  
 3 A That's correct, because he was not  
 4 able to be one with the board of directors in  
 5 the United -- USA according to my instructions.  
 6 Q Okay. And that is because --  
 7 MR. HYUN OOK SUH: I object.  
 8 Because he could not become one with  
 9 the board of directors in America -- no,  
 10 no. I'm sorry. I'm sorry. There was an  
 11 important --  
 12 Q And is it true that at the time he  
 13 was removed, he was not showing you, as True  
 14 Mother, absolute obedience?  
 15 MR. ROSENFELD: Objection to form.  
 16 A The reason that he was removed from  
 17 his position was not because he did not -- he  
 18 did not have the absolute loyalty. It was  
 19 because -- concerning the work that he was in  
 20 charge of. He -- the direction that he was  
 21 going with that work was different than the  
 22 churches in the United -- USA.  
 23 MR. HYUN OOK SUH: I mean, if I could  
 24 refine it, would that be okay?  
 25 MR. POLAK: If there are objections

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1 that you have to the translation, you can  
 2 state them. I don't know about any  
 3 refinement, but ...  
 4 MR. HYUN OOK SUH: The major  
 5 objection I have is not about loyalty, but  
 6 it's not -- he was not removed because of  
 7 lack of obedience. It's -- she didn't  
 8 mention loyalty. It's obedience.  
 9 MR. POLAK: I think we'll take that  
 10 break now, Jim.  
 11 THE VIDEOGRAPHER: We're now off the  
 12 record. The time is 12:00 p.m. This ends  
 13 Tape No. 2.  
 14 (Luncheon recess taken at 12:00 p.m.)  
 15  
 16  
 17  
 18  
 19  
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 21  
 22  
 23  
 24  
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1 AFTERNOON SESSION  
 2 (Time noted: 1:01 p.m.)  
 3 HAK JAHAN, resumed and  
 4 testified as follows:  
 5 CONTINUED EXAMINATION  
 6 BY MR POLAK:  
 7 THE VIDEOGRAPHER: This marks the  
 8 beginning of Tape No. 3. We're now back  
 9 on the record. The time is 1:01 p.m.  
 10 BY MR. POLAK:  
 11 Q Mrs. Moon, over lunch you had an  
 12 opportunity to think about the testimony that  
 13 you gave this morning. I'm going to give you  
 14 an opportunity now -- if you had anything you  
 15 wanted to change in your answers from this  
 16 morning or add to your answers, I just wanted  
 17 to give you the opportunity to do that now if  
 18 you thought you needed to do that.  
 19 A The way it has been operating up to  
 20 this point is that it doesn't just apply to the  
 21 United States but it applies to the -- the  
 22 world. Since -- the people who were appointed  
 23 as -- appointed as those who are responsible  
 24 for their location, they had -- they were  
 25 delegated authority to make decisions.

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1 MR. HYUN OOK SUH: I'd like to  
 2 object. I'd just like to mention that  
 3 what she said is that -- she didn't  
 4 mention the way to discipline until now.  
 5 She just said that until -- "Not just  
 6 regarding the United States but the entire  
 7 world, I give all the authority to the  
 8 people in charge, and they've been  
 9 delegated with that authority."  
 10 A I gave all the authority to those who  
 11 were appointed to their positions concerning  
 12 expanding their areas. The authority was  
 13 delegated since I am not only the spiritual  
 14 leader but I -- but also the True Parent.  
 15 Q Mrs. Moon, you told me that you asked  
 16 Mr. Kim to educate Sean Moon on providence and  
 17 teachings of the church following that  
 18 February 2018 event at Sanctuary Church.  
 19 Do you recall that?  
 20 A What was that?  
 21 Q Okay. Well, what I'm trying to do is  
 22 I'm trying to go back to some of the testimony  
 23 you gave this morning. And I believe you told  
 24 me that you and Mr. Kim were talking about the  
 25 event in February of 2018 at the Sanctuary

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1 Church involving the firearms and that you  
 2 instructed Mr. Kim to go and educate Sean Moon  
 3 on your church theology.  
 4 A Yes.  
 5 Q Did Mr. Kim go and make an effort to,  
 6 as you said, educate Sean Moon?  
 7 A I wouldn't know that.  
 8 Q You wouldn't know that?  
 9 A I wouldn't -- I wouldn't know whether  
 10 he educated Sean or not.  
 11 Q Do you know whether Mr. Kim ever  
 12 attempted to speak with Sean Moon?  
 13 A Like I said before, I delegated the  
 14 authority. And I am thinking about -- I'm  
 15 concerned about the providence with regard to  
 16 the world, not to a specific district such as  
 17 US Family Federation churches, and so it's not  
 18 limited. And I am concerned about the physical  
 19 and spiritual realm of the entire world, and  
 20 that's what a True Mother does and that's the  
 21 mission of a True Mother or True Parent.  
 22 Q So other than asking Mr. Kim to go  
 23 and educate Sean Moon, did you do anything else  
 24 as the head of the International Family  
 25 Federation as a response to the February 2018

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1 events at Sanctuary Church?

2 MR. ROSENFELD: Objection to form.

3 MR. HYUN OOK SUH: I'm sorry. I just

4 want to object to one thing.

5 She used the word "did you act on

6 something?" but you mentioned, "Did you

7 order something?" I think that's

8 different. (Speaking Korean)

9 Q I think I said, "Did you do anything

10 in response?"

11 A I did not instruct anything to any

12 individuals other than that.

13 Q Who is Sean Moon?

14 A He's the son I bore. It's imperative

15 the son knows the mother. A person who doesn't

16 recognize the mother who bore -- who gave birth

17 to him and raised him cannot be her son.

18 MR. HYUN OOK SUH: I'm sorry.

19 She says -- it's not that he cannot

20 be our son. It's that there cannot be --

21 there cannot be a son who does not

22 recognize the mother who bore him and

23 raised him.

24 A What kind of son, while his mother is

25 still living, brings his father a new wife?

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1 This is against -- this is immoral and

2 unethical.

3 MR. HYUN OOK SUH: I'm sorry. I just

4 want to mention that -- especially one

5 particular point I'd object to is that

6 regarding -- with regards to the father

7 who has ascended, what unethical and

8 immoral son will find a new wife for his

9 deceased father while the mother is alive,

10 to complete the sentence?

11 Q So do you consider him to be your

12 son?

13 MR. HYUN OOK SUH: Sorry. She said

14 --

15 MR. POLAK: Hold on, Mrs. Moon.

16 MR. HYUN OOK SUH: She said (speaking

17 Korean), which means do you emphasize?

18 And you said, "Do you consider?" I think

19 that's very different.

20 A Physically I'm his mother; however,

21 someone -- he has lost his original -- his --

22 his core responsibility. So he cannot be

23 viewed as a son; so he's not a son. I didn't

24 abandon him. He abandoned me.

25 MR. HYUN OOK SUH: Just objection to

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1 the earlier translation.

2 "Physically I give birth to him; so

3 he is my son. However, he lost the

4 original character of a son. With regards

5 to providence, he's not my son."

6 MR. ELDER: No. She said, in a

7 complete sentence, "He is not my son."

8 Q When did he stop being your son, as

9 you have explained it?

10 A After the father ascended, I told him

11 to wait for three years and study; however, he

12 made a -- he publicly announced that he

13 rejected me.

14 MR. HYUN OOK SUH: I object. What

15 she said is "He made a treasonous or a

16 proclamation -- or a proclamation that

17 betrayed me.

18 MR. ELDER: Treasonous is much too

19 strong a word to be a correct translation.

20 Betrayal is a more accurate word.

21 MR. HYUN OOK SUH: Sure.

22 BY MR. POLAK:

23 Q Can you tell me specifically what you

24 recall Sean Moon saying that was a betrayal?

25 A In front of the providence and the

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1 truth, the True Parents is the only True

2 Parents and True Mother who can accomplish

3 God's dreams and the -- mankind's wishes.

4 However, he rejected me; therefore, like I said

5 before, there is no forgiveness if you reject

6 the Holy Spirit. I am the only begotten son,

7 [sic] True Mother and the Holy Spirit.

8 MR. HYUN OOK SUH: Just one

9 correction. She didn't say, "I'm the only

10 begotten son." She said, "I'm the only

11 begotten daughter."

12 Q So you asked him to wait for

13 three years before leading the church. And his

14 response was, "I don't want to wait

15 three years, and I don't recognize you as True

16 Mother." Is that what happened?

17 MR. ROSENFELD: Objection to form.

18 Mischaracterizes.

19 A Well, I asked him to wait for

20 three years and study during that time, and I

21 told -- I said, "I would show you -- I will

22 show you in three years." However, he gave up

23 everything and ran away to the United States.

24 I didn't send him away. He voluntarily went.

25 He doesn't know who God is and he

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1 doesn't know the true nature of Jesus and he --  
 2 he didn't know the True Parents, that's why I  
 3 said, "I will show you the historical truth."  
 4 MR. HYUN OOK SUH: I'd just add one  
 5 thing.  
 6 And then lastly, she said, "That's  
 7 why I asked him to -- I asked him to  
 8 wait."  
 9 A Well, Creator God created the heaven  
 10 and -- heavens and earth and everything in it,  
 11 including the ancestors of men and women  
 12 according to his likeness.  
 13 MR. ELDER: His image.  
 14 THE INTERPRETER: His image.  
 15 A Therefore, Father God was not alone.  
 16 He created everything according to -- in the  
 17 likeness of his image and to perish in the  
 18 mineral world or animal kingdom and in  
 19 humanity.  
 20 MR. HYUN OOK SUH: Excuse me.  
 21 MR. ELDER: She's not finished.  
 22 A Creation cannot occur with just  
 23 father alone. There has to be mother. It's  
 24 imperative.  
 25 MR. HYUN OOK SUH: Sorry. Objection.

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1 Just to mention what she said before,  
 2 Mother didn't mention Father God is not  
 3 alone.  
 4 She said that "God created all of  
 5 creation in his image. There's plus and  
 6 minus in the mineral world. In the plant  
 7 world, we have stamen and pistil. In the  
 8 animal kingdom, we have male and female,  
 9 and in humanity, we have men and women;  
 10 therefore, it is not only God the Father."  
 11 That's what she mentioned before.  
 12 MR. ELDER: There's also "God the  
 13 Mother."  
 14 MR. HYUN OOK SUH: I do not recall  
 15 that she did say "God the Mother."  
 16 MR. POLAK: You recall her saying it?  
 17 MR. ELDER: I do.  
 18 MR. POLAK: Okay. All right.  
 19 Q What kind of son was Sean growing up?  
 20 A I thought I really needed to put an  
 21 effort in educating him.  
 22 Q Why?  
 23 A Because he didn't know God, he didn't  
 24 know the nature of God, he didn't know the  
 25 mission of a True Parent. That's why I thought

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1 he needed education -- needed educating. He  
 2 didn't know the true nature of Jesus. He  
 3 didn't know why Jesus said he was going to come  
 4 back again.  
 5 Q Was Sean a good student in high  
 6 school?  
 7 A You know, I'm a mother; so I have to  
 8 say that he was a good student.  
 9 Q He went to college; right?  
 10 A Yes.  
 11 Q He went to Harvard, didn't he?  
 12 A Well, I don't know if he was able to  
 13 graduate.  
 14 MR. HYUN OOK SUH: I'm sorry. She  
 15 said, "I don't know if he was able to  
 16 graduate properly."  
 17 Q Did he do well at Harvard?  
 18 A I wouldn't know that.  
 19 Q How would you not -- or why would you  
 20 not know how he did academically in college?  
 21 A Because I was the mother of a  
 22 universe -- mother of the universe, I could not  
 23 focus on one son alone.  
 24 MR. HYUN OOK SUH: Sorry. Objection.  
 25 "I cannot live looking at only one

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1 son."  
 2 Q Were you and Sean close when he was  
 3 growing up?  
 4 A You know, he was the youngest of my  
 5 sons; so I loved him a lot.  
 6 MR. HYUN OOK SUH: I think she used  
 7 (speaking Korean), which is the most. "I  
 8 loved him the most."  
 9 Q Were you and Sean close when he was  
 10 in college?  
 11 A You can do some research as to how  
 12 many times I went around the world, and in  
 13 order to have a -- have -- maintain or have the  
 14 closest relationship, you have to be physically  
 15 close.  
 16 Q After college, what did Sean do, if  
 17 you remember?  
 18 A He was exploring different religions;  
 19 so my understanding is he also got involved  
 20 in -- with Buddhism and also Catholic Church.  
 21 Q How do you feel about that?  
 22 A I didn't think that was a bad idea  
 23 that my son was doing that because the role of  
 24 a True Parent is to unify religions.  
 25 Q Did any of your other children go and

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1 explore other religions in the same way?  
 2 A No, none of my other sons did.  
 3 Q What about your other daughters?  
 4 A Not that I know of; however, they may  
 5 have delved into some studies.  
 6 Q Was Sean close with his father, the  
 7 Reverend Moon, growing up?  
 8 A In my view, yes.  
 9 Q Was he closer to his father than his  
 10 other brothers?  
 11 A When he was still young, he -- he  
 12 spent a lot of time with his father.  
 13 MR. HYUN OOK SUH: I'm sorry.  
 14 "Because he was still young, he spent  
 15 a lot of time."  
 16 Q Do you recall ever witnessing  
 17 disagreements over theology between Sean Moon  
 18 and the Reverend Moon?  
 19 A I don't know.  
 20 Q You don't know or you don't remember?  
 21 A I'm saying I don't know because I  
 22 never witnessed -- witnessed that. You know,  
 23 ten years -- for ten years before the True  
 24 Father ascended, I made multiple world tours.  
 25 So we were apart quite a lot.

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1 Q Did the Reverend Moon ever tell you  
 2 that he had had a disagreement over theology  
 3 with Sean Moon?  
 4 A You're asking me if Reverend Moon  
 5 ever said that? No.  
 6 Q Did Reverend Moon ever have  
 7 discussions with you about the need for his  
 8 successor?  
 9 A There was no mention of a successor.  
 10 Q Ever?  
 11 A Everyone is still immature. Physical  
 12 body alone does not make him your son. It's  
 13 impossible to explain about God -- or it was  
 14 impossible to explain about God to him. He  
 15 didn't understand the mission of the True  
 16 Parent, although he was -- although they were  
 17 born as sons and daughters of True Parent, they  
 18 did not understand the mission. And the True  
 19 Parents were -- are the messiah and savior and  
 20 the true parents of the mankind.  
 21 MR. HYUN OOK SUH: Objection. I  
 22 think that the order of the interpretation  
 23 was reversed, meaning that there's room  
 24 for ambiguity.  
 25 My understanding is that what she

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1 said is, "I repeat myself several times,  
 2 but he could not understand -- he could  
 3 not explain God. He cannot -- he does not  
 4 understand the mission of True Parents.  
 5 Although he may have been born as True  
 6 Parents' children, he do not -- he doesn't  
 7 understand True Parents. We are the  
 8 savior, messiah, and True Parents. We're  
 9 the True Parents of all 7.6 billion people  
 10 around the world. Even though he may be  
 11 my physical children -- not only my  
 12 physical children are my children, but all  
 13 of humanity are our children."  
 14 A If he was my son, then he should have  
 15 the -- the likeness of me.  
 16 MR. ELDER: Resemblance.  
 17 A However --  
 18 MR. ELDER: Resemblance of.  
 19 THE INTERPRETER: Resemblance?  
 20 A Resemblance of me; however, he  
 21 refused to resemble me.  
 22 Q Did Reverend Moon ever say anything  
 23 publicly that you disagreed with?  
 24 A Concerning what? My son?  
 25 Q Anything.

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1 A Well, I cannot pinpoint an incident.  
 2 Q But you told me before that the words  
 3 of True Parents were words that were formed by  
 4 both of you, not just Reverend Moon.  
 5 A That's correct.  
 6 Q So my question to you is whether you  
 7 ever recall Reverend Moon saying something  
 8 publicly that was not also the words of True  
 9 Parents.  
 10 A What I'm saying is for 60 years while  
 11 he was alive, we focused on working toward  
 12 accomplishing the God -- the parents' dreams.  
 13 Therefore, what I'm saying is in a public  
 14 forum, Pastor Moon did not say anything that  
 15 was not mutually agreed upon.  
 16 MR. HYUN OOK SUH: I disagree  
 17 regarding the last translation. My  
 18 translation would be, "In the public  
 19 forum, Reverend Moon did not speak based  
 20 on his own thoughts."  
 21 Q They were the thoughts of both you  
 22 and Reverend Moon?  
 23 A There was a providence.  
 24 Q Was Reverend Moon born with original  
 25 sin or without original sin?

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1 MR. ROSENFELD: Object to form.  
 2 A At 16 years of age, Reverend Moon --  
 3 Jesus appeared to Reverend Moon and said he was  
 4 going to come back, and he gave Reverend Moon  
 5 to carry on the responsibilities. Therefore,  
 6 since then, Reverend Moon has been walking the  
 7 life of a responsible -- walking the life to  
 8 fulfill the responsibility which was not  
 9 fulfilled by Jesus, who said that he was gonna  
 10 come back again during the time Korea was under  
 11 Japanese rule.  
 12 MR. HYUN OOK SUH: Objection. I  
 13 think this is particularly important. I  
 14 think this is what my understanding of  
 15 her -- of her words were.  
 16 "At the age of 16, Jesus appeared  
 17 before Reverend Moon and asked him to  
 18 carry on the mission for which he  
 19 mentioned he would come again. And Jesus,  
 20 the only begotten -- since then,  
 21 Reverend Moon walked the path of the only  
 22 begotten son to fulfill the mission that  
 23 Jesus could not fulfill. And at that  
 24 time, Korea was under Japanese  
 25 occupation."

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1 A If you look at your father's lineage,  
 2 he had one older brother and he had a lot of  
 3 younger siblings. There was one parent,  
 4 although he had a lot of siblings, and I cannot  
 5 say his siblings were born without original  
 6 sin. So you can deduct from that.  
 7 MR. HYUN OOK SUH: I'm sorry.  
 8 Objection.  
 9 "The Reverend Moon had one parent  
 10 and, however, like, we cannot say that the  
 11 siblings did not have original sin, and  
 12 you can make your own conclusion."  
 13 Q Well, what I'm asking --  
 14 MR. POLAK: Go ahead, Tim.  
 15 MR. ELDER: Reverend Moon and his  
 16 siblings had one pair of parents, yes.  
 17 They were the same parents, but not that  
 18 Reverend Moon had one parent. Obviously,  
 19 he had two.  
 20 MR. HYUN OOK SUH: Same parents.  
 21 Q Mrs. Moon, I'm really just asking you  
 22 for a yes or a no answer.  
 23 Is your view, as True Mother, that  
 24 Reverend Moon was born with original sin?  
 25 MR. ROSENFELD: Objection to form.

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1 A I believe I answered the question.  
 2 Q You did not, respectfully. I heard  
 3 you telling me I should draw my own  
 4 conclusions. But as you told me, you are the  
 5 highest religious authority in your church, and  
 6 I'm asking you, as that highest religious  
 7 authority in your church, to tell me whether,  
 8 in your theology, the Reverend Moon was born  
 9 with original sin.  
 10 MR. ROSENFELD: Objection to form.  
 11 Asked and answered.  
 12 A Reverend Moon was able to become the  
 13 True Parent only because he met me.  
 14 MR. HYUN OOK SUH: I'm sorry.  
 15 Objection.  
 16 She said, "Reverend Moon -- because  
 17 Reverend Moon met me, the only begotten  
 18 daughter, he could ascend to the position  
 19 of True Parents.  
 20 Q So let's go ahead and get that  
 21 translated.  
 22 A In 1943 -- I was born in 1943, and  
 23 Korea was liberated in 1945. And thereafter,  
 24 two Koreas divided to South and North Korea,  
 25 and I was born in the northern part -- north

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1 part of Korea.  
 2 MR. ELDER: Anju, Anju.  
 3 A Anju. And -- and God told me to go  
 4 to South Korea; however, God told him to go to  
 5 North Korea.  
 6 Why? Because Reverend Moon had to --  
 7 had a mission to carry out for Jesus, which was  
 8 to -- which was redemption.  
 9 MR. ELDER: Indemnify.  
 10 A To indemnify.  
 11 MR. HYUN OOK SUH: Objection just to  
 12 that part.  
 13 From the moment she said, "When God  
 14 asked Reverend Moon to go to North Korea,"  
 15 North Korea was still under Communist rule  
 16 at that time, and this was a position  
 17 where his life would be at risk or a  
 18 position where he could only die. This is  
 19 because upholding Jesus' mission, there  
 20 was something for Reverend Moon to  
 21 indemnify.  
 22 A So what I'm saying is that in the  
 23 process -- considering the process, until he  
 24 met me. And before he met me, I cannot say  
 25 that he was without the original sin.

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1 MR. HYUN OOK SUH: I object.  
 2 My understanding is, "In the process  
 3 to meet me, until the Reverend Moon met  
 4 me, we cannot say that he did not have  
 5 original sin. There was indemnity  
 6 conditions to be paid."  
 7 Q Were you born with original sin?  
 8 A Because I was born without the  
 9 original sin, that's why I am the only begotten  
 10 daughter. That's why God saved me.  
 11 Q But I thought Reverend Moon was also  
 12 the only begotten son.  
 13 A Meeting Jesus at age 16, he -- was  
 14 when he was given the qualifications as the  
 15 only begotten son.  
 16 However, since age 16, he still had  
 17 to walk the path of Jesus Christ for  
 18 indemnification and -- and redemption. And the  
 19 place for -- the time and place where -- when  
 20 he met me was when he became the only begotten  
 21 son.  
 22 MR. HYUN OOK SUH: Objection.  
 23 "At the age of 16, when Reverend Moon  
 24 met Jesus and he received the mission from  
 25 Jesus, was when he had the qualification

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1 as only begotten son. And from the age of  
 2 16, Reverend Moon had walked the path that  
 3 Jesus needed to complete and, therefore,  
 4 Reverend Moon fulfilled -- had conditions  
 5 of indemnity to pay. However, in 1963,  
 6 the holy wedding, by meeting me, then he  
 7 ascended to the position of only begotten  
 8 son."  
 9 MR. ROSENFELD: Can we ask Mrs. Moon  
 10 if she needs a break sometime?  
 11 MR. POLAK: Does she need a break or  
 12 you need a break?  
 13 MR. HYUN OOK SUH: She said she  
 14 wanted to break. I want to rest.  
 15 THE VIDEOGRAPHER: We're now off the  
 16 record. The time is 1:50 p.m. This marks  
 17 the end of Tape No. 3.  
 18 (Short recess taken)  
 19 THE VIDEOGRAPHER: This marks the  
 20 beginning of tape number four. We're now  
 21 back on the record. The time is 2:03 p.m.  
 22 Q Mrs. Moon, did you ever tell the  
 23 Reverend Moon that he had original sin?  
 24 MR. ROSENFELD: I'm going --  
 25 MR. POLAK: I know what your

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1 objection is. I'm going to connect it  
 2 here, but I can't ask the predicate  
 3 question yet.  
 4 MR. ROSENFELD: Okay. So let me just  
 5 put on the record under the Court's order,  
 6 the Court ruled that questions directed at  
 7 eliciting the private statements made by  
 8 the reverend and Mrs. Moon about each  
 9 other are prohibited unless the proponent  
 10 lays a foundation.  
 11 You can go ahead.  
 12 MR. POLAK: Thanks, Jim.  
 13 A I don't know why you keep  
 14 mentioning -- you keep talking about the  
 15 original sin. However, there was -- I never  
 16 talked about the original sin with him.  
 17 The True Parent found the only  
 18 begotten son only through the only begotten  
 19 daughter, and it took 6,000 years. So -- but  
 20 then, I mean, there should be -- there should  
 21 have been an answer.  
 22 Why do you keep asking about it?  
 23 MR. HYUN OOK SUH: Objection. I  
 24 think that that was not the correct  
 25 translation at all.

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1 With regards to True Parents, the  
 2 only begotten daughter who came for the  
 3 first time in 6,000 years without original  
 4 sin found the only begotten son. And that  
 5 should answer your question about the  
 6 original sin.  
 7 I don't know why you keep asking  
 8 these questions.  
 9 MR. POLAK: Jim, you're probably  
 10 going to object to this question, but  
 11 it's -- I have to ask it in this way in  
 12 order to make sure the predicate is laid,  
 13 okay?  
 14 Q My understanding is that you accused  
 15 the Reverend Moon of having original sin and  
 16 Reverend Moon's reaction was threatening to  
 17 divorce you.  
 18 Is that a correct statement or an  
 19 incorrect statement?  
 20 MR. ROSENFELD: I'll object. I'll  
 21 object to asking questions about intimate  
 22 details, including private discussions of  
 23 their relationship, which the Court has  
 24 ordered not do unless you lay a  
 25 foundation. And there is no foundation

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1 for that, so we'll object to it.  
 2 Q You can answer the question.  
 3 THE INTERPRETER: The interpreter  
 4 would like to indicate there was an  
 5 answer.  
 6 MR. POLAK: What was the answer?  
 7 A It's incorrect.  
 8 Q It's incorrect. Okay.  
 9 Did the Reverend Moon have to educate  
 10 you on Unification Church theology?  
 11 A No, he did not educate me.  
 12 The heavenly provident -- only  
 13 begotten son --  
 14 MR. ELDER: Daughter.  
 15 THE INTERPRETER: I'm sorry.  
 16 A Only begotten daughter. I understand  
 17 the heavenly -- and the creator father and the  
 18 heavenly providence. I already knew the  
 19 teachings before. I already knew the teachings  
 20 that Reverend Moon teaches.  
 21 So after Reverend Moon married me,  
 22 normally you had to go through a 40-day  
 23 fasting, a seven-day fasting, and 40-day  
 24 retreat. However, I did not go through that.  
 25 MR. HYUN OOK SUH: Objection. I'd

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1 just like to clarify just a few points  
 2 that I think were not interpreted  
 3 accurately.  
 4 As the only begotten daughter, I  
 5 already know heavenly parents providence,  
 6 I know heavens providence, and I know The  
 7 Mission of True Parents.  
 8 And before Reverend Moon taught his  
 9 theology, I already knew it. That is why  
 10 after Reverend Moon married me --  
 11 normally, in our church you have to go  
 12 through 14 days of fasting, workshops, and  
 13 seven days of fast. However, I did not  
 14 need to go through that.  
 15 And if I've explained this much, I  
 16 think you need to understand.  
 17 Q So did you understand the Unification  
 18 theology perfectly at age 11 when you first met  
 19 Reverend Moon?  
 20 MR. HYUN OOK SUH: One objection. I  
 21 think you mentioned "perfectly," and she  
 22 omitted it. So...  
 23 A Yes, I have to say I knew it  
 24 perfectly because at age 17 I had the  
 25 conviction to carry out the -- or complete the

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1 objectives of heavenly parent, and I knew it  
 2 had to be me to do that.  
 3 So think about it. I was 17, and I  
 4 married a 40-year-old man.  
 5 MR. HYUN OOK SUH: Objection. I  
 6 think one important passage was  
 7 mistranslated.  
 8 I can say that I knew it perfectly  
 9 because at the age of 17, I made a firm  
 10 resolve that if it were not for me, no one  
 11 else could realize God's dream. That is  
 12 why at the age of 17 I decided to marry a  
 13 40-year-old man. Think about it. Is that  
 14 possible?  
 15 A During the Korean War, Korea was  
 16 divided between north and south, and God sent  
 17 me from north to south, and God sent Reverend  
 18 Moon from south to north.  
 19 And he -- North Korea regime did not  
 20 recognize religions, so he spent time in  
 21 Hungnam jail. And he was looking -- he -- a  
 22 day before he was to be executed, my general  
 23 sent -- General MacArthur to Korea, and he  
 24 landed in Inchon, and that's how Reverend Moon  
 25 was released from Hungnam jail.

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1 MR. HYUN OOK SUH: Objection. I  
 2 think that, while accurate, that there's  
 3 some details that that were missing.  
 4 It's not with the Korean War. But  
 5 with the liberation of Korea, Korea was  
 6 divided into democratic south and the  
 7 communist north.  
 8 God guided me to South Korea while  
 9 God asked father to go to North Korea.  
 10 North Korea was under a communist regime  
 11 at the time. This was a place where  
 12 religion was not recognized.  
 13 Father was put into Hungnam  
 14 penitentiary, and the day before he was  
 15 due to be executed, thanks to God's  
 16 heaven's grace and protection, 16 U.N.  
 17 member nations were mobilized, and  
 18 President Eisenhower gave the directive to  
 19 General MacArthur to carry out the Inchon  
 20 Landing operation through which Reverend  
 21 Moon was liberated and democracy in South  
 22 Korea could be preserved.  
 23 Just looking at that, we can see  
 24 heaven's handiwork.  
 25 THE INTERPRETER: May the interpreter

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1 ask the same question again, please.  
 2 Because the answer was so confounding,  
 3 it's really difficult for the interpreter  
 4 to kind of get the grasp of the entire  
 5 answer.  
 6 Can I ask the question again?  
 7 MR. POLAK: Can you read the question  
 8 back?  
 9 MR. HYUN OOK SUH: May I offer to  
 10 interpret her last statement.  
 11 Yes, please. So the mission of the  
 12 only begotten son was to find the word  
 13 which Jesus was not able to promulgate in  
 14 his lifetime. Therefore, in order for  
 15 father to find the status as the only  
 16 begotten son, he needed to find the word  
 17 which is why following his liberation  
 18 father went to Pusan where he wrote -- he  
 19 found and he wrote down the word, and on  
 20 that foundation father had the  
 21 qualification as the only begotten son to  
 22 meet the only begotten daughter.  
 23 Q Prior to Reverend Moon's death, did  
 24 you ever have any discussions with Sean Moon  
 25 regarding who would take over as the leader of

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1 the Unification of [sic] Church after the  
 2 Reverend Moon died?  
 3 MR. HYUN OOK SUH: I'm sorry.  
 4 Objection. She said "take over," but I  
 5 think you mentioned "lead."  
 6 MR. POLAK: I thought I said "take  
 7 over," but I used probably would mean both  
 8 those words interchangeably.  
 9 A Concerning the providence, I cannot  
 10 view the Reverend Moon as completing the work  
 11 of providence on earth.  
 12 He mentioned about the kingdom on  
 13 earth; however, the one who proclaimed it and  
 14 opened it was myself.  
 15 MR. HYUN OOK SUH: I just want to say  
 16 that "Cheon il guk" means more than just  
 17 the kingdom that she mentioned.  
 18 MR. POLAK: Who said Cheon il guk?  
 19 The witness said Cheon il guk?  
 20 MR. HYUN OOK SUH: Yes.  
 21 MR. POLAK: And she interpreted using  
 22 the word Cheon il guk?  
 23 MR. HYUN OOK SUH: No, no. She said,  
 24 "kingdom."  
 25 MR. POLAK: Kingdom.

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1 And you're saying the term "Cheon il  
 2 guk" means more than just "kingdom"? It  
 3 means something different than that?  
 4 MR. HYUN OOK SUH: Yes.  
 5 MR. POLAK: Okay. I'm not going to  
 6 go down that theological rabbit hole right  
 7 now, but...  
 8 MR. HYUN OOK SUH: Sure.  
 9 Q Okay. What I'm trying to understand,  
 10 Mrs. Moon, is whether or not you and Sean Moon  
 11 ever had a conversation before the  
 12 Reverend Moon died over whether it would be you  
 13 leading the church or Sean Moon leading the  
 14 church.  
 15 A Well, you're asking me if there was a  
 16 conversation between Reverend Moon and myself?  
 17 Q No. I'm asking Sean Moon. Sean Moon  
 18 and you.  
 19 A Well, the circumstances did not allow  
 20 that sort of question to arise because Sean at  
 21 the time needed to grow much more, and he was a  
 22 male who was not complete, and even though I  
 23 was his mother, he was not my equal as to carry  
 24 on a conversation.  
 25 Your questions are very ignorant. I

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1 told you to remember two years he was not my  
 2 equal. I was the True Parent.  
 3 Q So is the answer to my question,  
 4 Mrs. Moon, that you never had a discussion with  
 5 Sean Moon about whether he would be taking over  
 6 leadership of the church?  
 7 A I just said it's impossible to have  
 8 that kind of a conversation because we were not  
 9 equals. So how could that be, that  
 10 conversation?  
 11 Hyung Jin needed to -- Hyung Jin was  
 12 in position to be absolutely -- Hyung Jin  
 13 needed to follow me completely.  
 14 MR. HYUN OOK SUH: Objection.  
 15 Q Hold on, Mrs. Moon.  
 16 Do you have an objection?  
 17 MR. HYUN OOK SUH: Yes.  
 18 She said, Sean Moon needed to follow  
 19 me unconditionally. He needed to attend  
 20 me.  
 21 Q Mrs. Moon, you wanted to complete  
 22 your answer. If you have nothing to add,  
 23 that's okay. You indicated before that there  
 24 was something else you wanted to say.  
 25 A Okay. Let's carry on to another

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1 question.

2 Q Same question except as to you and

3 the Reverend Moon.

4 Did you two have conversations about

5 who was to take leadership of the Unification

6 Church after he died?

7 A Well, all the family or the church

8 family knows this.

9 MR. HYUN OOK SUH: Members.

10 A In the public forum, Reverend Moon

11 has mentioned that he was the leader and that I

12 was the number two leader. That meant that I

13 was his equal in every respect.

14 MR. HYUN OOK SUH: Sorry. I just

15 like to correct that. He didn't say

16 leader. (Speaking Korean) means like head

17 of the church.

18 MR. ELDER: Founder.

19 MR. HYUN OOK SUH: Founder.

20 Q My question for you was more than

21 that, Mrs. Moon. What I'm asking you is

22 whether you and Reverend Moon had specific

23 conversations over who would take over the

24 leadership of the church after he died?

25 A Since long ago Reverend Moon knew

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1 that since he was older, if he passes on, that

2 I was to take on all the responsibilities and

3 continue with the work. That's why he

4 mentioned that I was the number two, the second

5 founder. And he also educated or trained great

6 leaders who were able to support me or help me.

7 Q Now, you understand, though, that

8 before he died the Reverend Moon identified

9 Sean Moon as his successor?

10 A "Successor" is a word that shouldn't

11 be thrown around that easily. Like I said

12 before, True Parents -- for True Parents, there

13 are no successors. There can only be central

14 characters who --

15 MR. HYUN OOK SUH: Central figures.

16 A -- central figures who are appointed

17 by the True Parents. I can give you an example

18 for -- in Israel, in Judaism, there are --

19 MR. HYUN OOK SUH: The grand priest.

20 MR. ELDER: The high priest.

21 A -- high priest. And also Sean and

22 another son of mine don't have the right

23 information.

24 MR. HYUN OOK SUH: Are mistaken.

25 Q So are you saying that the

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1 Reverend Moon never identified Sean Moon as his

2 successor in any public statements?

3 A I never heard him say that.

4 Q Did you ever hear Reverend Moon

5 identify Sean Moon as his representative and

6 heir?

7 THE INTERPRETER: You need to repeat

8 the question, please, because the

9 interpreter --

10 Q Did you ever -- the question was did

11 you ever hear Reverend Moon identify Sean Moon

12 as his representative and heir.

13 A Okay. I know that you are preparing

14 video clip to show me; however, that doesn't --

15 that clip is not an indication that

16 Reverend Moon was appointing or naming Sean as

17 his heir. It was just a warning to other sons.

18 MR. HYUN OOK SUH: I'm sorry. She

19 omitted one very important passage.

20 And in order to become the heir, in

21 the proclamation there needed to be my

22 signature as well, but in that

23 proclamation my signature is not there.

24 Q Is that because you disagreed with

25 the Reverend Moon? Is that why your signature

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1 was not there?

2 A I knew that's what his intention was;

3 however, there are other -- another son who

4 claimed that he was the oldest son and who was

5 the rightful heir.

6 However, I know that Reverend Moon

7 was doing that because the son was close to him

8 and he listens to him and it was to protect his

9 son. It was an expression, Reverend Moon's

10 expression, to protect his son, as a means to

11 protect his son.

12 MR. HYUN OOK SUH: I'm sorry.

13 Objection. I think there is room for

14 ambivalence and ambiguity as to which son

15 is being mentioned; therefore, I'd like to

16 offer -- and also the last sentence was

17 missing.

18 I understood Reverend Moon's

19 intention. We have another son who claims

20 to be the eldest son and the rightful

21 heir. However, because meaning Sean was

22 close to father and could listen, the

23 intention was to protect him and also to

24 provide an armor to protect him.

25 Without two parents' signature, this

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1 proclamation cannot be considered as  
 2 valid.  
 3 Q Did the Reverend Moon ever say  
 4 publicly that he thought he needed a successor  
 5 other than you?  
 6 A He did not mention a successor.  
 7 Q I'm going to play a video for you,  
 8 Mrs. Moon.  
 9 A I mean, I have many sons.  
 10 Q Oh. I'm sorry.  
 11 A However, the central character should  
 12 have -- was to be someone whose life or who  
 13 lives with true love in the center. And there  
 14 was no one that we could name as the successor  
 15 because my children were not ripe or fully  
 16 grown.  
 17 MR. HYUN OOK SUH: Objection. I  
 18 think -- while the translation, I think  
 19 there's an important passage that was not  
 20 properly translated, especially towards  
 21 the end.  
 22 With regards to the successor, we  
 23 have many children. However, from among  
 24 our children, those who live for the sake  
 25 of others -- those who live a model and

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1 who work -- who live as models can be  
 2 appointed by True Parents as central  
 3 figures. Our True Parents do not  
 4 specifically target one particular child  
 5 and say this is my successor.  
 6 The children, the sons, were still  
 7 immature, and therefore, they were still  
 8 immature.  
 9 Q Mrs. Moon, what I'm going to show you  
 10 is a video from what "appears to be" an  
 11 inauguration ceremony -- quotes around it --  
 12 from 2008. I'm going to play the video for a  
 13 little bit just to refamiliarize yourself with  
 14 that event, and then I'm going to ask you some  
 15 questions about it.  
 16 Some of it's in Korean; some of it's  
 17 in English. We don't need to translate it. I  
 18 really just want you to look at the images.  
 19 (Video playing)  
 20 Q We're going to pause a second there,  
 21 Mrs. Moon.  
 22 MR. ROSENFELD: I want to put an  
 23 objection on the record.  
 24 So I'll object to the lack of  
 25 foundation for that exhibit and to the

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1 fact that I think it's confusing to take  
 2 it out of context and will object to the  
 3 English translation on it which I think is  
 4 incorrect and confusing.  
 5 MR. POLAK: Okay.  
 6 (Exhibit 93, CD, marked for  
 7 identification.)  
 8 MR. POLAK: Well, I wasn't showing it  
 9 to you for the English translation.  
 10 Q And I don't think, Mrs. Moon, you  
 11 were looking at the English translation. It  
 12 was in Korean.  
 13 I assume you under -- that was the  
 14 Reverend Moon that was on the video, wasn't it?  
 15 A Yes.  
 16 Q And he was speaking in Korean,  
 17 correct?  
 18 A Yes.  
 19 Q And do you recall him giving that  
 20 public statement?  
 21 A I don't remember what's the  
 22 circumstances that he was speaking that -- and  
 23 what kind of a public forum was that.  
 24 And does it have any explanation?  
 25 Q The video itself does not. I'm just

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1 asking you whether you recall it.  
 2 A It's not clear.  
 3 Q I believe it occurred in 2008.  
 4 A Looking at it from the True Parent  
 5 providence perspective, the background or  
 6 circumstances was not -- qualifying background  
 7 or circumstances was not there.  
 8 True Parents have to be approved by  
 9 the nation or the country, and it has to start  
 10 that way. If -- at the time of Jesus, if he  
 11 was recognized by a country, he may not have  
 12 died.  
 13 MR. HYUN OOK SUH: Objection. I  
 14 think that the passage was mistranslated.  
 15 Mrs. Moon did not mention the  
 16 qualifying background. The circumstances  
 17 were not there.  
 18 She says, it is -- the Bible is  
 19 written in symbols and parables, and True  
 20 Parents should have come on the national  
 21 level. Unfortunately, the necessary  
 22 supporting environment could not be  
 23 established.  
 24 In the case of Jesus, if Jesus had  
 25 proclaimed that he was the messiah in the

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1 Council of Elders in Rome, he may not have  
 2 needed to die or be crucified.  
 3 Q But having sat there and watched  
 4 those 54 seconds of video clip, would you agree  
 5 with me that the Reverend Moon is saying in  
 6 that clip that he needs to appoint a successor  
 7 to carry on his work after he dies?  
 8 MR. ROSENFELD: Objection.  
 9 Foundation.  
 10 A That wasn't my view.  
 11 Q What was your view?  
 12 A If all the blessed family agreed and  
 13 said, yes, that's correct, we would like this  
 14 person to become the central figure, then  
 15 that's another story. However -- and you have  
 16 to be -- that person has to be a respectable  
 17 person.  
 18 However, among my sons and daughter,  
 19 there's not a single person who is qualified to  
 20 be that person. They are too biased.  
 21 Q Mrs. Moon --  
 22 MR. HYUN OOK SUH: Just objection.  
 23 One thing. She omitted the last sentence  
 24 she said which is they cannot become  
 25 leaders.

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1 Q Mrs. Moon, did you hear the  
 2 Reverend Moon say that in there was -- in that  
 3 video clip that there was no other member of  
 4 the church at that time with the faith that  
 5 Sean Moon has, and that is why he was  
 6 appointing him as his heir and successor?  
 7 MR. ROSENFELD: Objection to form.  
 8 A So what.  
 9 Q So what?  
 10 A What's the question?  
 11 Q My question is did you hear that part  
 12 of the clip where the Reverend Moon was saying  
 13 that there was no other member of the church at  
 14 that time with the faith that Sean Moon has,  
 15 and that was the basis on which he was  
 16 appointing him as his heir and successor?  
 17 MR. ROSENFELD: Same objection.  
 18 A I don't think that's what he meant.  
 19 Q Is that what he said?  
 20 A I don't know if he said that on the  
 21 video.  
 22 Q Let's go ahead.  
 23 A I don't think that was his intention.  
 24 MR. HYUN OOK SUH: His original  
 25 heart.

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1 (Video playing)  
 2 Q Does that refresh your memory as to  
 3 what the video said in terms of whether  
 4 Reverend Moon said that there was no other  
 5 member of the church with the faith that Sean  
 6 Moon has and that Sean Moon is appointed?  
 7 A What that meant, among the sons --  
 8 Q Mrs. Moon, I'm not asking you what  
 9 was meant. I'm asking you what was said on the  
 10 video.  
 11 MR. ROSENFELD: Object to form and  
 12 foundation.  
 13 Q I'll ask you what you think he meant  
 14 in another question. I'm asking you whether  
 15 you heard him say it on the video.  
 16 A I can't -- I don't recognize that, or  
 17 I can't recognize it.  
 18 Q You can't recognize it because you  
 19 didn't hear it in the video?  
 20 A I don't honor it, whether I listen --  
 21 whether I heard it or not because Sean, Hyung  
 22 Jin, Moon was not qualified to become the  
 23 leader.  
 24 Q Yes. I understand, Mrs. Moon, that  
 25 you have a disagreement with Sean Moon over

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1 whether he was ready, but that's not really  
 2 what I'm asking.  
 3 I'm asking you about what you were  
 4 hearing in the video that I just played that  
 5 was in Korean, in your language.  
 6 I would ask for the peanut gallery  
 7 over here to please be quiet, Mr. Lay.  
 8 A I said I cannot honor that.  
 9 Q I understand you cannot honor it,  
 10 meaning that you won't agree with it.  
 11 What I'm asking you, Mrs. Moon, is  
 12 what you are hearing on the video.  
 13 MR. ROSENFELD: I'll object.  
 14 Q It is in your language. So you can  
 15 tell me what it is that you're hearing.  
 16 A I don't recall.  
 17 MR. ROSENFELD: Objection --  
 18 Q Okay. I'll play it again for you.  
 19 MR. ROSENFELD: -- as argumentative  
 20 and badgering the witness. I think you've  
 21 got the answer you're going to get from  
 22 her.  
 23 A Even if you replayed, I don't recall.  
 24 Q I'm not asking you whether you recall  
 25 the events at the time. I'm asking you to

1 listen to the video and tell me what you hear  
 2 the Reverend Moon saying.  
 3 (Video playing)  
 4 Q Mrs. Moon?  
 5 MR. ROSENFELD: The question is what  
 6 did he say?  
 7 Q I'm asking you what it is you hear  
 8 him saying in the video.  
 9 A Well, he mentioned that Hyung Jin had  
 10 great faith.  
 11 Q And did he say anything else about  
 12 Sean Moon in terms of appointing him?  
 13 MR. ELDER: Objection. Laura did not  
 14 say successor. He just said anything  
 15 about appointing him.  
 16 The translator said appointing him as  
 17 successor. The lawyer's question --  
 18 Q I did say "appointing him."  
 19 A No, I did not hear that.  
 20 Q We'll go back, and we can play it  
 21 again.  
 22 (Video playing)  
 23 MR. ROSENFELD: I think the problem  
 24 is, I'm told that it ends with him saying  
 25 do you understand. It doesn't have him

1 saying I appoint him.  
 2 MR. ELDER: No, I disagree. It  
 3 clearly states (speaking Korean) which  
 4 means --  
 5 MR. POLAK: Again, I'm not asking for  
 6 anybody to translate anything. I'm asking  
 7 her what she is hearing. That is the  
 8 basis of my question, and there's nothing  
 9 wrong with it.  
 10 So, Mrs. Moon, I'm asking you do you  
 11 hear Reverend Moon saying that he is  
 12 appointing Sean Moon in that video clip I  
 13 just played for you?  
 14 A You know, I made it clear to you.  
 15 The True Father cannot at his own discretion  
 16 make that decision without my consent. I am  
 17 the True Parent.  
 18 The True Parent does not consist of  
 19 the father. It also includes mother, and the  
 20 mother has more authority. So I should have  
 21 been the one. It should have come from me.  
 22 So what's the point of replaying that  
 23 again? Are you playing games?  
 24 Q Well --  
 25 A You don't understand the providence.

1 You don't understand the True Parents. Well,  
 2 just by looking at that short clip of the  
 3 video, you have no idea what his intentions  
 4 were when he was saying that.  
 5 So how do you expect me to make a  
 6 decision from that? And I kept telling him I  
 7 mentioned about True Parent. And the true  
 8 mother has the most authority. Life came from  
 9 the true mother, and true mother nurtured them.  
 10 MR. HYUN OOK SUH: Raised him.  
 11 Q So if the video shows the Reverend  
 12 Moon saying that he --  
 13 A The video plug -- the video clip was  
 14 not complete. It only shows the father's side.  
 15 It did not show the mother's side.  
 16 MR. ROSENFELD: Note my objections on  
 17 the video foundation and the taking it out  
 18 of context.  
 19 Q I'm going to show you the rest of  
 20 this video -- okay. But, first of all, let me  
 21 back up.  
 22 Now after having talked about that  
 23 particular video clip for the last ten minutes  
 24 or so, does it refresh your memory about when  
 25 and where and under what circumstances the

1 Reverend Moon was making that public statement?  
 2 MR. ROSENFELD: Objection to form.  
 3 A I don't know when. I don't know  
 4 where. That's not something that I'm  
 5 interested in.  
 6 Q I'm going to play another portion of  
 7 this video, and it's going to go for about  
 8 40 seconds or so.  
 9 (Video playing)  
 10 Q I'm stopping the video right now. I  
 11 just want you to watch the video. Much of this  
 12 is in English, and so the reason why I'm  
 13 showing it to you is to see if you remember  
 14 this event here because I'm going to ask you  
 15 some questions about it.  
 16 You are in the video in some of these  
 17 spots. You're not talking, but you're  
 18 depicted.  
 19 MR. ROSENFELD: This is 92.  
 20 MR. POLAK: Correct.  
 21 I believe this is all HSA -- I'm  
 22 sorry, Family Federation International  
 23 video clip. I don't think this comes from  
 24 Sanctuary.  
 25 (Video playing)

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1 Q So, Mrs. Moon, I understand that this  
 2 was a video from the inauguration ceremony for  
 3 Sean Moon as international president.  
 4 Is that your recollection now having  
 5 looked at this video?  
 6 A Yes, I do remember the international  
 7 president inauguration.  
 8 Q Okay. And you were there?  
 9 A Yes.  
 10 Q Who was it that made the decision for  
 11 Sean Moon to be the new international president  
 12 for Family Federation?  
 13 A Parents.  
 14 Q Who decided it first? You or the  
 15 Reverend Moon?  
 16 A Together. Both together.  
 17 Q Who raised it first?  
 18 A I did, because I wanted to develop  
 19 him.  
 20 MR. HYUN OOK SUH: Raise him.  
 21 A Because I figure that he was going  
 22 to -- it would help him to grow in every  
 23 respect if he was -- if he was able to see the  
 24 situations of the world or world environment.  
 25 MR. HYUN OOK SUH: Objection. That's

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1 not what she said.  
 2 She said that I raised it first  
 3 because whether artistically or from every  
 4 point of view, it would help in his  
 5 development.  
 6 Q Was this ceremony intended to do  
 7 anything other than present Sean Moon as the  
 8 new international president?  
 9 A The objective of him being  
 10 inaugurated as the international president was,  
 11 as I have traveled around the world, I wanted  
 12 him to travel around the world and become --  
 13 become a qualified international leader.  
 14 However, that's not what happened.  
 15 MR. HYUN OOK SUH: She missed one  
 16 important point which is that he could  
 17 also learn and grow from members through  
 18 his international tours, but he couldn't  
 19 do so.  
 20 Q Do you know who recorded this video?  
 21 A No.  
 22 Q Do you know whether this is a Family  
 23 Federation video?  
 24 A I don't know.  
 25 Q Would you agree with me that part of

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1 the Reverend Moon's message at this  
 2 inauguration ceremony was not only that Sean  
 3 Moon would be the new international president  
 4 but also that the church membership would come  
 5 to know him as the successor to the Reverend  
 6 Moon himself?  
 7 MR. ROSENFELD: Objection to form.  
 8 Lacks foundation.  
 9 A No.  
 10 Q Why not?  
 11 A I told you many times that there was  
 12 no successor. You are really slow in  
 13 understanding.  
 14 MR. HYUN OOK SUH: Not slow in  
 15 understanding. I'm sorry. She did not  
 16 say that.  
 17 She said, this is frustrating.  
 18 Q Do you recall there being media  
 19 reports about this inauguration ceremony in  
 20 Korea?  
 21 A What was the question again? What  
 22 did the media do?  
 23 Q Do you recall there being any media  
 24 reporting around this inauguration ceremony?  
 25 News story by newspapers or reporters, that

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1 kind of thing.  
 2 MR. HYUN OOK SUH: Sorry. I think  
 3 the right term for "media report" is  
 4 (speaking Korean).  
 5 A You know, I really don't know --  
 6 remember if it was reported by the media.  
 7 Q I'm going to jump to the  
 8 38-minute-and-56-second point here in this  
 9 video, if I can.  
 10 (Video playing)  
 11 Q This is a portion of the video that  
 12 talks about media reports. I want you to take  
 13 a look at these and see if that refreshes your  
 14 memory.  
 15 (Video playing)  
 16 Q It goes on with additional media  
 17 reports. Does that -- do you recognize any of  
 18 those media reports we just watched?  
 19 A No.  
 20 Q Okay. Do you recall -- well, does it  
 21 at least refresh your memory that there were  
 22 media reports around the inauguration ceremony  
 23 back in 2008?  
 24 A Yes, I believe there was media  
 25 reports.

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1 Q And do you recall there being any  
 2 concern at the Family Federation that any of  
 3 the media reports around his inauguration were  
 4 inaccurate?  
 5 MR. HYUN OOK SUH: I'm sorry. You  
 6 mentioned concern.  
 7 A My recollection is that there was  
 8 some incorrect media report with regard to  
 9 Hyung Jin's education, background.  
 10 MR. ELDER: Credentials. With regard  
 11 to his academic credentials.  
 12 Q That was it, though? That's the only  
 13 concern about the accuracy of the media  
 14 reports?  
 15 THE INTERPRETER: May the interpreter  
 16 ask Mrs. Moon to clarify something,  
 17 please.  
 18 A There was so many events. And  
 19 especially ten years prior to his ascension,  
 20 there were so many things -- so many issues  
 21 that were complicated. So I cannot say I can  
 22 remember everything.  
 23 Q Do you recall whether there were any  
 24 press releases issued around this by the Family  
 25 Federation?

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1 MR. HYUN OOK SUH: Sorry, I think she  
 2 mistranslated. "Press release" is  
 3 (speaking Korean).  
 4 A I'm sure, if we look for it, we can  
 5 find the press release documents.  
 6 Q Would you have been involved in the  
 7 approval of any press releases around this  
 8 inauguration ceremony?  
 9 A I mean, I don't understand the  
 10 question.  
 11 MR. HYUN OOK SUH: What she's  
 12 saying --  
 13 A You're saying the press releases go  
 14 out with -- only with my approval?  
 15 MR. HYUN OOK SUH: No, that's not  
 16 what she said.  
 17 She says that your question is  
 18 strange. What do you mean by approval for  
 19 media report?  
 20 Q That you looked at it and approved  
 21 the language in it.  
 22 A I mean, I have no knowledge of it.  
 23 MR. POLAK: Jim, I actually gave you  
 24 the exhibit copy there. Lamis has your  
 25 copy.

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1 What I'm going to do is I'm going to  
 2 mark Exhibit No. 93 now. That's your  
 3 exhibit copy for 93.  
 4 Q Mrs. Moon, what I'm going to do is  
 5 I'm going to show you another video clip. This  
 6 one is entirely in Korean. I'm not going to  
 7 play the entire video for you.  
 8 Instead what I want to do is I just  
 9 want to play it for you. Let you watch it.  
 10 Let you hear it. I'll probably play 30 seconds  
 11 or so of the video, and I want to ask you some  
 12 questions about your memory of that event, what  
 13 it was around, that kind of thing, okay.  
 14 (Video playing)  
 15 Q I played the first 56 seconds of the  
 16 video, Mrs. Moon, and I stopped it right as --  
 17 it's a ceremony of some type, and I stopped it  
 18 right as you and the Reverend Moon are riding  
 19 in on a golf cart, and you're followed by Sean  
 20 Moon and his wife.  
 21 Do you see that?  
 22 A Yes.  
 23 Q Do you recall this ceremony?  
 24 A Yes.  
 25 Q What is this ceremony?

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1 A The explanation is long. Do you want  
 2 to listen to the whole explanation?  
 3 Q I don't need to understand the  
 4 theology behind it.  
 5 Is there a title for this ceremony?  
 6 A Well, I cannot tell you that. I  
 7 mean, you don't -- if you're not going to allow  
 8 me to give you the full explanation, how can I  
 9 just see that screen shot and explain it to  
 10 you?  
 11 Q Then go ahead and explain it to me.  
 12 If you could just try to break it up into small  
 13 chunks, though, if it's a really long answer.  
 14 A That event occurred because of the  
 15 True Parents. While True Parents are the  
 16 savior, messiah, and the king of all kings.  
 17 However --  
 18 THE INTERPRETER: May the interpreter  
 19 ask her to clarify?  
 20 MR. POLAK: Uh-huh.  
 21 A -- however, in order for the messiah  
 22 to be enthroned as the king of kings, there has  
 23 to be a nation. That was all symbolic. It was  
 24 symbolic in saying that there was a -- there  
 25 was a responsibility to accomplish that

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1 objective in the future.  
 2 It was -- that ceremony was symbolic  
 3 in paving the way to complete the creator  
 4 father's purpose of creation and for the  
 5 kingdom of God to --  
 6 MR. HYUN OOK SUH: Sorry. Just  
 7 objection.  
 8 A -- to be realized.  
 9 MR. HYUN OOK SUH: Objection. She  
 10 said that this event was symbolic in  
 11 paving the way to realize God's ideal of  
 12 creation in a unified world.  
 13 Q Mrs. Moon, did this ceremony have  
 14 anything to do in particular with Sean Moon?  
 15 MR. ROSENFELD: Objection. I don't  
 16 think the witness was finished with her  
 17 answer.  
 18 MR. POLAK: Okay.  
 19 A Okay. I still need to continue.  
 20 Like I said before, this was a  
 21 symbolic ceremony, and the road ahead was very  
 22 far.  
 23 MR. HYUN OOK SUH: Long.  
 24 A This was because the fallen mankind  
 25 and each family had to become a True Family,

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1 true tribe, and true nation. And in order to  
 2 become a united family with God at the center,  
 3 united family of mankind with God at the  
 4 center, it doesn't mean that it was achieved.  
 5 That's -- that's the purpose that we were  
 6 working towards.  
 7 However, in that path if you cannot  
 8 fulfill your responsibility, then it's possible  
 9 that you may have to have step down from your  
 10 position.  
 11 Q Mrs. Moon, what I'm -- let me ask you  
 12 this question: Did this ceremony have a  
 13 purpose with respect to Sean Moon?  
 14 A Well, the purpose of the ceremony was  
 15 to show that this world had to move toward the  
 16 world with God at the center. While Hyung Jin  
 17 was not lifted up or appointed because he was  
 18 perfect or complete but because we wished him  
 19 to realize his parents' wishes.  
 20 MR. HYUN OOK SUH: Objection to  
 21 both the previous translation and this  
 22 one.  
 23 The purpose of this ceremony was to  
 24 show the direction which the world needs  
 25 to go to realize a unified world. And the

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1 reason why Hyung Jin Jim was raised -- was  
 2 raised is because -- it was to -- so that  
 3 he could uphold True Parents. He was not  
 4 raised to that position because he was  
 5 fruitful or complete or perfect.  
 6 Q So are you saying that this was not a  
 7 ceremony to recognize Sean Moon as the  
 8 Reverend Moon's heir or representative or  
 9 successor?  
 10 A That's correct. He's still  
 11 incomplete.  
 12 MR. HYUN OOK SUH: There's still --  
 13 she said they are all still incomplete or  
 14 immature.  
 15 Q Here in the video frame that I paused  
 16 it on, which is the second 56, we see here that  
 17 Sean Moon is wearing a crown.  
 18 Why is he wearing a crown?  
 19 A Well, it wasn't because that he was  
 20 a -- he was a complete person. It was just an  
 21 indication that he had the potentials. And at  
 22 the time our other sons had issues, and through  
 23 this ceremony -- the ceremony was to indicate  
 24 to him that he needed to be a qualified person  
 25 that his parents can acknowledge.

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1 MR. HYUN OOK SUH: And she added that  
 2 he is not the successor, and he is -- he  
 3 still needs a lot to be qualified.  
 4 Q Mrs. Moon, you told me a lot there in  
 5 your answer about what the crown didn't mean,  
 6 and that really wasn't my question.  
 7 My question was why is he wearing a  
 8 crown? What does that mean?  
 9 MR. ROSENFELD: Objection to form.  
 10 A The meaning is that our wish for him  
 11 to resemble his True Parents.  
 12 MR. HYUN OOK SUH: Sorry. She did  
 13 not say wish. Basically, she said,  
 14 resemble True Parents.  
 15 Q So he's wearing a crown because you  
 16 and the Reverend Moon are wearing crowns?  
 17 A Okay. His parents have succeeded.  
 18 However, Hyung Jin had a long road ahead of  
 19 him. And my other sons were self-centered, and  
 20 it was showing just that, not because that we  
 21 acknowledged him.  
 22 MR. HYUN OOK SUH: Sorry.  
 23 A I mean, in reality, if a king chose a  
 24 successor, he would give his own crown to the  
 25 successor.

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1 MR. HYUN OOK SUH: Sorry. I have an  
 2 objection to the translation before. That  
 3 was mistranslated.  
 4 And the father and mother have been  
 5 successful. However, Hyung Jin still has  
 6 a far -- a long way to go. And all the  
 7 sons said that they were the central  
 8 figures; therefore, the crown was not a  
 9 sign that he was recognized but of what he  
 10 needed to do.  
 11 Q Was there anyone else at this  
 12 ceremony that wore a crown other than you,  
 13 Reverend Moon, Sean Moon, or Sean Moon's wife?  
 14 A I mean, does it show on the video?  
 15 because I don't know.  
 16 Q I don't believe there's anybody else  
 17 that I've seen that was wearing a crown at that  
 18 ceremony, but I'm just asking you and your  
 19 memory.  
 20 A The True Parents in 6,000 years, if a  
 21 child -- children are born to that true parent  
 22 and they are all princes and princesses, and so  
 23 in a kingdom when a prince is born, is he not  
 24 crowned? And if you look at the Korean  
 25 history, when a prince is born from a royal

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1 family, he gets to wear a crown.  
 2 Q Were any of Sean Moon's brothers or  
 3 sisters present at this ceremony? And if so,  
 4 were they wearing a crown?  
 5 A Not all of them because they were  
 6 raised up as central figures. However, when  
 7 they were -- after they were born, when they  
 8 were babies, they were wearing crowns.  
 9 Q Mrs. Moon, at this ceremony, at this  
 10 time in this video, no one else was wearing a  
 11 crown, were they?  
 12 A I told you: The crown that was on  
 13 him was symbolic for this -- at this ceremony.  
 14 Q My question, though, Mrs. Moon,  
 15 relates to not Sean Moon but to the brothers  
 16 that were present.  
 17 And you don't recall any of those  
 18 brothers wearing crowns.  
 19 MR. ROSENFELD: Objection to the  
 20 form.  
 21 A I don't know why you keep asking  
 22 questions. Because with regard to his other  
 23 siblings, this was a ceremony to raise them up  
 24 as central figures. That's why Hyung Jin was  
 25 the only one was wearing a crown.

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1 MR. POLAK: I think we're out of  
 2 tape.  
 3 MR. HYUN OOK SUH: Symbolically.  
 4 MR. POLAK: We're out of tape.  
 5 THE VIDEOGRAPHER: This marks the end  
 6 of tape number four. We're now going off  
 7 the record. The time is 3:31 p.m.  
 8 (Short recess taken)  
 9 THE VIDEOGRAPHER: This marks the  
 10 beginning of tape number five. We're now  
 11 back on the record. The time is 3:52 p.m.  
 12 Q I'll just hand you a couple of these  
 13 things here. If you can touch those for me,  
 14 please.  
 15 I just want the record to reflect  
 16 that we have served Mrs. Moon with the New York  
 17 lawsuit that was filed. We've also served the  
 18 International Family Federation lawsuit in  
 19 New York that was filed. Mrs. Moon, as being  
 20 the highest person, she's been served with  
 21 that.  
 22 I don't intend to ask those questions  
 23 but --  
 24 MR. ROSENFELD: We asked you not to  
 25 serve her directly during this, and we

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1 object to it.  
 2 MR. POLAK: I figured you would, but  
 3 that's okay. We can deal with the  
 4 proprietary of the service later but --  
 5 MR. LAY: We asked you to let us know  
 6 if you intended to do so we could respond  
 7 accordingly, but you didn't give us that  
 8 courtesy --  
 9 MR. POLAK: My concern was that she  
 10 wouldn't show up.  
 11 MS. MAJITOVA: That was very  
 12 inappropriate.  
 13 MR. POLAK: You guys can raise  
 14 whatever arguments you want to make later  
 15 on, but I think at this point she is  
 16 served and the International Family  
 17 Federation is served.  
 18 BY MR. POLAK:  
 19 Q Okay. So getting back to the  
 20 deposition itself here, Mrs. Moon, before we  
 21 took our break, we were looking at a video, and  
 22 it was Exhibit 93.  
 23 And now what I've done is I've  
 24 fast-forwarded to -- I guess the time here is  
 25 five-minute-and-33-second slot. And I'm going

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1 to play part of the video just to show you  
 2 where the Reverend Moon is speaking. I don't  
 3 know what he's saying because it's in Korean.  
 4 I don't expect to ask you any questions  
 5 specifically about it, but I just want to get  
 6 your memory about what you recall what Mr. Moon  
 7 was saying.  
 8 (Video playing)  
 9 MR. ROSENFELD: Put an objection on  
 10 the record --  
 11 MR. POLAK: I stopped at 6:04.  
 12 MR. ROSENFELD: -- about this tape  
 13 not showing something from a ceremony out  
 14 of context. And we'll object to the  
 15 translation which is not a certified  
 16 translation, and I'll object to playing  
 17 something in Korean that I don't have a  
 18 translation for. So this is an  
 19 inappropriate exhibit.  
 20 MR. POLAK: I don't believe there's a  
 21 translation of this. I think what you're  
 22 referring to when you say "translation" is  
 23 you're talking about the Korean language  
 24 that's underneath it?  
 25 MR. ROSENFELD: The Korean subtitles.

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1 Exactly.  
 2 BY MR. POLAK:  
 3 Q Mrs. Moon, do you recall separate  
 4 from the language that's on the video, the  
 5 Reverend Moon giving a speech during this  
 6 ceremony in January of 2009?  
 7 A No. There were so many events. I  
 8 cannot recall. Therefore, I don't have a clear  
 9 recollection.  
 10 MR. HYUN OOK SUH: She said she's not  
 11 certain.  
 12 Q Do you recall the Reverend Moon  
 13 speaking specifically about Sean Moon during  
 14 this ceremony?  
 15 A He probably didn't.  
 16 Q He did not?  
 17 A He probably didn't. Did not.  
 18 Q Okay. Why do you say that?  
 19 A That ceremony which is portrayed in  
 20 that video was a ceremony to acknowledge God's  
 21 kingship and True Parents -- and acknowledge  
 22 True Parents. So it was an event to uphold  
 23 God, creator God.  
 24 MR. HYUN OOK SUH: Objection. I just  
 25 want -- because these are very specific

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1 church terms, this was a coronation  
 2 ceremony for the kingship of God and so  
 3 the coronation for True Parents. It is a  
 4 place where we attended God. It was not  
 5 for Hyung Jin.  
 6 MR. ROSENFELD: Was this part of  
 7 Exhibit 93?  
 8 MR. POLAK: Yes.  
 9 Q Whose idea was it for this ceremony?  
 10 Yours or the Reverend Moon's?  
 11 MR. ELDER: It was a revelation from  
 12 heaven.  
 13 A Revelation from heaven.  
 14 Q Who was it revealed to?  
 15 A The original owner of the cosmos is  
 16 the creator, God.  
 17 THE INTERPRETER: May the interpreter  
 18 ask her to clarify something, please.  
 19 (Interpreting)  
 20 A Well, God was supposed to be the  
 21 master; however, with the fall of man, God did  
 22 not belong -- the man did not belong to God.  
 23 MR. HYUN OOK SUH: Objection. I  
 24 think that was mistranslated. First, I'd  
 25 like to translate what she mentioned

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1 before.  
 2 The owner was not able to act as an  
 3 owner. And later, additional explanation  
 4 she gave was that, originally, God was  
 5 meant to be the true owner; however, due  
 6 to the fall of man, God was not able to  
 7 properly be the owner of human beings.  
 8 A There are two terms that the  
 9 interpreter is completely unfamiliar with.  
 10 Could I just ask --  
 11 MR. POLAK: Maybe the check  
 12 interpreters might be able to assist.  
 13 MR. ELDER: What are the terms?  
 14 THE WITNESS: (Speaking in Korean)  
 15 MR. ELDER: "Vertical" or  
 16 "horizontal."  
 17 A The creator God is the True Parent,  
 18 and he's the vertical parent, and the earthly  
 19 parents were horizontal parents. And on earth  
 20 the earthly parents have -- the successful  
 21 earthly parents who are the only begotten son  
 22 and only begotten daughter have to return  
 23 everything to the God, the creator.  
 24 MR. HYUN OOK SUH: Objection. I  
 25 think -- I'd like to interpret what was

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1 said before and additional explanation  
 2 that was given.  
 3 Heavenly parent is -- should be the  
 4 true owner, and the people who can return  
 5 God to that position are True Parents.  
 6 While on earth, the only begotten son and  
 7 the only begotten daughter, True Parents,  
 8 need to host an event where they return  
 9 everything unto God.  
 10 The additional explanation she gave  
 11 was, if heavenly parent are the vertical  
 12 True Parents of humanity, then the only  
 13 begotten son and the only begotten  
 14 daughter are the horizontal True Parents  
 15 on earth, and they need to return  
 16 everything unto God. Basically, True  
 17 Parents wanted to raise God through this  
 18 event.  
 19 BY MR. POLAK:  
 20 Q Do you recall that there were three  
 21 separate ceremonies in early 2009 where Sean  
 22 Moon was identified by Reverend Moon as his  
 23 successor?  
 24 MR. ROSENFELD: Objection.  
 25 Foundation.

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1 A No, not a successor. He was not a  
 2 successor.  
 3 Q Do you recall any ceremonies in early  
 4 2009 where Sean Moon was identified by the  
 5 Reverend Moon as the Reverend Moon's successor?  
 6 MR. ROSENFELD: Same objection.  
 7 MR. ELDER: I think I heard the  
 8 translator say 2008.  
 9 MR. POLAK: 2009.  
 10 A No, I can't recall.  
 11 Q And so if others attending, for  
 12 example, the ceremony that we've been watching  
 13 on the video, which is Exhibit 93 -- if others  
 14 watching that ceremony came away with the  
 15 belief that Sean Moon was being identified by  
 16 the Reverend Moon as the Reverend Moon's  
 17 successor, that belief by those people is  
 18 inaccurate?  
 19 MR. ROSENFELD: Objection. Form and  
 20 foundation.  
 21 A That's inaccurate. The creator  
 22 father, after he created Adam and Eve, he gave  
 23 them time to grow --  
 24 MR. ELDER: Grow.  
 25 A -- and without that growth, you

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1 cannot be the central figure.  
 2 MR. HYUN OOK SUH: Objection. She  
 3 omitted quite a lot.  
 4 She said -- Mrs. Moon said that God,  
 5 the creator, created Adam and Eve and gave  
 6 them a period of growth for which they  
 7 should fulfill their responsibility.  
 8 It is the same for Hyung Jin. He  
 9 needs to fulfill his responsibility. If  
 10 he does not fulfill his responsibility,  
 11 True Parents cannot appoint him as a  
 12 central figure.  
 13 Q What does Sean Moon have to do to  
 14 fulfill that responsibility?  
 15 A His attitude towards parents,  
 16 especially to the True Mother -- not the true  
 17 father -- he should offer absolute faith,  
 18 absolute love and absolute -- absolute love and  
 19 absolute faith and absolute obedience. Without  
 20 that, he cannot be a central figure.  
 21 MR. HYUN OOK SUH: I have an  
 22 objection. Basically, there was a part  
 23 where the main interpreter mentioned "not  
 24 the True Father." That is not the case.  
 25 What Mrs. Moon, True Mother,

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1 mentioned is that with regards to the  
 2 parents, especially not the father but the  
 3 mother -- regarding the mother, he needs  
 4 to have absolute faith, absolute faith,  
 5 and absolute obedience. If he fails in  
 6 this responsibility, he cannot be a  
 7 central figure.  
 8 A As I mentioned before, I gave an  
 9 example of using a Bible quote. It said, if  
 10 you reject the messiah, you can be forgiven;  
 11 however, if you reject the Holy Spirit, then  
 12 there's no forgiveness.  
 13 Q Did Sean Moon reject you as the True  
 14 Mother before the Reverend Moon's death?  
 15 MR. HYUN OOK SUH: Objection. I have  
 16 two objections. One is the accurate  
 17 translation of (speaking Korean) is not  
 18 "reject" but is "to speak against" or "to  
 19 insult."  
 20 And she said that -- also, when she  
 21 translated the same or she did not -- she  
 22 said she did not recognize, whereas the  
 23 intention was to say "speak against."  
 24 Q Go ahead.  
 25 A What I'm saying is Hyung Jin did not

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1 know his mother. All of my sons and daughters  
 2 think that their mother was -- their father  
 3 raised their mother; however, that's wrong.  
 4 MR. ELDER: It's the opposite. It's  
 5 opposite she said.  
 6 A I was born as the daughter of God  
 7 because I know the thoughts of God.  
 8 MR. HYUN OOK SUH: Sorry. Objection.  
 9 That's misrepresentation.  
 10 Since I am the daughter of God, I  
 11 understand his thoughts or I know his  
 12 thoughts.  
 13 Q So the answer to my question was,  
 14 yes, Sean Moon rejected you as True Mother  
 15 before the Reverend Moon died?  
 16 MR. ROSENFELD: Objection to form.  
 17 A Okay. What I'm saying was that he  
 18 did not really know me. He did not understand  
 19 my missions.  
 20 Q Okay. Did the Reverend Moon know  
 21 that Sean Moon did not know you, as you've used  
 22 that phrase, before he died -- before the  
 23 Reverend Moon died?  
 24 A I'm sure Reverend Moon thought that  
 25 he, Sean, needed to -- there was a lot that

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1 Sean needed to learn.  
 2 Q So whatever it is that we've seen in  
 3 these videos that the Reverend Moon was saying,  
 4 he was saying that with an understanding that  
 5 Sean Moon did not yet know you, as you've used  
 6 that phrase?  
 7 MR. ROSENFELD: Objection to form.  
 8 A Are you asking me that's what  
 9 Reverend Moon did?  
 10 Q No. I'm asking you -- what I'm  
 11 trying to understand, Mrs. Moon, is whether or  
 12 not your disagreements with Sean Moon over his  
 13 respect for you existed only after the Reverend  
 14 Moon died, or did that lack of respect or  
 15 knowing you exist before the Reverend Moon  
 16 died, too?  
 17 MR. ROSENFELD: Objection to form.  
 18 A Even prior to the Reverend Moon's  
 19 passing, I thought Sean was inadequate. So I  
 20 told him to wait three years.  
 21 Q But you didn't tell him to wait three  
 22 years until after the Reverend Moon died,  
 23 right?  
 24 MR. ROSENFELD: Objection.  
 25 Mischaracterizes.

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1 A Yes, I told him that after  
 2 Reverend Moon passed away. However, prior to  
 3 his passing, Sean was still not perfect.  
 4 That's why I told him to wait.  
 5 Q I'm going to show you another video  
 6 clip. This one has been marked as Exhibit 94  
 7 for record purposes.  
 8 (Exhibit 94, CD, marked for  
 9 identification.)  
 10 Q And in the video you'll see here in a  
 11 minute I believe it was from June 5, 2010, and  
 12 in it there's a document that is being created  
 13 by the Reverend Moon with your assistance. I  
 14 believe that document is showing here on the  
 15 second page of Exhibit 13.  
 16 What I'm going to do right now is I'd  
 17 ask you to keep that Exhibit 13 page in front  
 18 of you, Mrs. Moon, but we're going to play this  
 19 video and watch it for a little bit. We'll  
 20 probably go a little longer on this clip than  
 21 we have with the other ones. We're going to  
 22 watch that clip, and then I'm going to ask you  
 23 some questions about it, okay.  
 24 (Video playing)  
 25 MR. POLAK: I played the first minute

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1 and 20 seconds of that video.  
 2 MR. ROSENFELD: Same objections as to  
 3 the video as to the prior videos.  
 4 Q Now, Mrs. Moon, first of all, that's  
 5 you in the video, isn't it?  
 6 A Yes.  
 7 Q Do you recall being there?  
 8 A Yes.  
 9 Q Do you know who it is that is  
 10 recording that video?  
 11 A My daughter-in-law.  
 12 Q Sean Moon's wife?  
 13 A Probably.  
 14 Q So who else is present in that room  
 15 at that time other than you, the Reverend Moon,  
 16 and Sean Moon's wife?  
 17 A No one.  
 18 Q Sean Moon is not also there?  
 19 A He was.  
 20 Q Anyone else present?  
 21 A I don't recall who else was there.  
 22 Q Okay. Now, we see that the  
 23 Reverend Moon -- well, actually, what time of  
 24 the day was this done?  
 25 A I think it was in the middle of

1 night. Like early in the morning.  
 2 MR. POLAK: Early morning?  
 3 MR. ELDER: Early morning.  
 4 Q Was that unusual, for the  
 5 Reverend Moon to make statements that early in  
 6 the morning, or was there nothing unusual about  
 7 that?  
 8 A Well, he does get up. However, on  
 9 that particular morning, Hyun Jin hurried over  
 10 and asked his father to create that because,  
 11 according to Hyun Jin, Hyung Jin was claiming  
 12 to be the successor.  
 13 Q Could we use American names because  
 14 it's a little easier for us since there's --  
 15 since there's so much similarity between Hyung  
 16 Jin and Hyun Jin. If we can use "Sean Moon"  
 17 and "Preston Moon" in the translation, that  
 18 would be helpful.  
 19 A So Sean came over and wanted his  
 20 father to express it in a strong manner.  
 21 MR. ELDER: I actually also did  
 22 notice where she was talking about  
 23 Preston, where she was talking about Sean,  
 24 she could make that clear for the  
 25 translation purpose.

1 A Well, Sean came early in the morning  
 2 to ask his father to draw that out because at  
 3 the time young Preston was claiming that he was  
 4 the successor and he was going to manage  
 5 everything.  
 6 So what do you think his father  
 7 should have done at this point to give  
 8 self-confidence to Sean?  
 9 MR. HYUN OOK SUH: No. No,  
 10 objection. That's not absolute -- that's  
 11 not what she said.  
 12 The father told Sean, what should I  
 13 do for you to move forward with  
 14 confidence?  
 15 Q What did Sean say?  
 16 A What do you mean what did he say?  
 17 His father created this document.  
 18 While I was there to assist him with  
 19 regard to either correct spelling or correct  
 20 verbiage, however, Sean still needed to fulfill  
 21 his responsibilities. He needed to take care  
 22 of his parents, not just his father. In order  
 23 to do that, there needed to be absolute faith,  
 24 absolute love, and absolute obedience.  
 25 MR. HYUN OOK SUH: Objection. I

1 think that she omitted something very  
 2 important, and she omitted the part that  
 3 this is not the decisive document. And  
 4 afterwards she said, I did not sign this  
 5 document.  
 6 Q When Sean came to Reverend Moon  
 7 asking for his father to create this document,  
 8 did you object?  
 9 A I did not object.  
 10 Q After the Reverend Moon was done  
 11 writing this, did you object?  
 12 A Like I said before, Sean was not --  
 13 Sean was not perfect. And also the person who  
 14 created the nation of cosmic peace and unity  
 15 was not the True Father. It was True Mother.  
 16 That's why I did not sign that.  
 17 MR. HYUN OOK SUH: Objection. I  
 18 think she omitted two important passages.  
 19 The first one is I did not object, and  
 20 however, since Sean Moon was not  
 21 perfected, this is symbolic. The person  
 22 who opened (speaking Korean), or the  
 23 nation of cosmic peace and unity, is not  
 24 true father. It is I.  
 25 Q Did the Reverend Moon ask you to sign

1 this?  
 2 A No, he did not. Even if he had  
 3 asked, I would not have signed it.  
 4 Q Well, there's a reason why he didn't  
 5 ask you, isn't there?  
 6 A I mean, you should ask it -- ask that  
 7 question to Reverend Moon.  
 8 Q Well, the reason why Reverend Moon  
 9 didn't ask you to sign it is because he didn't  
 10 think he needed your signature, did he?  
 11 MR. ROSENFELD: Objection to form.  
 12 A What kind of question is that? I  
 13 don't know.  
 14 MR. HYUN OOK SUH: She said, I don't  
 15 know what kind of question is that.  
 16 Q Can you pick up that document please,  
 17 Exhibit 13? And I'd ask you: Can you read  
 18 Reverend Moon's handwriting?  
 19 A Well, without the special glasses, I  
 20 cannot read that.  
 21 MR. HYUN OOK SUH: At this moment.  
 22 Q Do you have your special glasses with  
 23 you here today?  
 24 A I did not.  
 25 Q They are not in the other room?

1 A No.

2 Q They're not with your security

3 detail?

4 A Why should I be carrying -- why

5 should I carry my magnifying glasses? If you

6 really wanted me to read it, why don't you ask

7 Mr. Kim to read it because I can hear. I can

8 hear.

9 Q Okay. Are your glasses with you here

10 in the United States?

11 A I mean, I beg you. Due to my health

12 conditions -- I am a public figure. Do I have

13 to reveal to you the conditions of my eyes? I

14 mean, this isn't something that I can do.

15 Q I'm just asking you whether your

16 glasses -- the special glasses that you're

17 referring to are in the United States.

18 A I do not have those special glasses.

19 I am in the middle of medical treatments. I

20 think you're insulting me.

21 Q I certainly do not mean to insult

22 you, Mrs. Moon.

23 A This is an insult to my character but

24 because why do you repeatedly keep making me do

25 things that I don't want to say? Why must I

1 reveal about my condition, every condition to

2 you?

3 MR. ROSENFELD: Can we take a --

4 Q I have not asked --

5 A If I tell you that my physical health

6 is not well, then are you going to cure me?

7 Take care of me.

8 MR. ROSENFELD: We did tell you she

9 was going to have a problem reading the

10 exhibits. So if there is anything that

11 needs to be read to her --

12 MR. POLAK: Jim, she's the one who

13 said that she could read it with her

14 special glasses. That's what generated

15 this entire line of questioning.

16 MR. ROSENFELD: That's not --

17 MR. POLAK: That's exactly what she

18 said.

19 MR. ROSENFELD: Let's move on for a

20 minute --

21 MR. POLAK: No, I'm not going to move

22 on to it.

23 MR. ROSENFELD: You can --

24 MR. POLAK: I'm going to ask the

25 witness one more question here, and it

1 might lead to other questions.

2 BY MR. POLAK:

3 Q First of all, Mrs. Moon, I'm not

4 trying to insult you, and I'm not trying to

5 inquire into your medical condition.

6 You had said to me in a prior answer

7 that you could read this document if you had

8 your special glasses, and that's the only

9 reason why I'm asking you if you have them with

10 you. Because if you did, I'd ask you to get

11 them so you can read.

12 A I did not bring it with me, and I do

13 not own such reading glasses.

14 MR. POLAK: Do you have the

15 ability --

16 Check interpreter, do you have the

17 ability to read that out loud for her?

18 A Read it out loud.

19 MR. POLAK: Yes.

20 MR. HYUN OOK SUH: See, because of

21 the Chinese character, is it possible if I

22 read like Korean version, that I can read?

23 MR. POLAK: Do you have a copy of the

24 Korean version?

25 MR. HYUN OOK SUH: Yes.

1 MR. POLAK: If you are going to be

2 reading from something, I guess I need to

3 have that marked as an exhibit so we can

4 have whatever it is.

5 Did you come prepared already with a

6 Korean version of that?

7 MR. HYUN OOK SUH: No. I would look

8 for it.

9 But with all due respect, maybe

10 someone else can read it.

11 MR. POLAK: I don't want --

12 MR. HYUN OOK SUH: Maybe you could

13 ask her secretary to read it for her?

14 MR. POLAK: I don't want to get hung

15 up on the translation. I don't even want

16 to think about that for a minute. So you

17 just put that to the side right now, and

18 maybe Mr. Rosenfeld and I are going to

19 have a conversation off line about how to

20 deal with that.

21 BY MR. POLAK:

22 Q Okay. Mrs. Moon, did you have an

23 understanding as to what it was that Mr. Moon

24 wrote on that document at the time that he

25 wrote it back in 2010?

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1 A I mean, the content states that  
 2 Preston was not the leader, that he was neither  
 3 the leader or the -- nor the representative and  
 4 the Reverend was going to raise Sean.  
 5 Q Did the Reverend Moon confirm by this  
 6 document that Sean Moon was his representative  
 7 and heir to assume control of the church after  
 8 he died?  
 9 MR. ROSENFELD: I'll object to the  
 10 foundation based on asking about her  
 11 memory rather than limiting it to --  
 12 A That may have been the father's  
 13 intention, but I told you already that it was  
 14 not my intention. I mean, that was not -- it  
 15 was not a mutual decision to create that.  
 16 THE INTERPRETER: Sorry. I forgot, I  
 17 didn't write it down.  
 18 MR. HYUN OOK SUH: May I interpret?  
 19 This was not written by the father  
 20 and the mother. This is something that  
 21 the father did for the sake of the son.  
 22 However, as I mentioned before, Sean was  
 23 not perfected.  
 24 How many times do I need to repeat  
 25 myself?

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1 Q Did you have any conversations with  
 2 the Reverend Moon before he died about this  
 3 document?  
 4 A I have been telling the True Father  
 5 from long time ago that it was not yet time to  
 6 raise the son. Hyung Jin -- Sean and Preston,  
 7 all of them needed to go through discipline and  
 8 education from the True Father in order to  
 9 become leaders. Therefore, since long time  
 10 ago, I objected to that idea.  
 11 MR. HYUN OOK SUH: Objection. I  
 12 think one important part was omitted.  
 13 (Speaking Korean) Sean and Preston  
 14 were not yet ready to become leaders, and  
 15 they needed to study more, and they needed  
 16 to be trained more, meaning trained more,  
 17 and they needed to receive True Parents  
 18 education. That is why from a long time  
 19 ago true father and I've been in a  
 20 position.  
 21 A Well, if you have a chance, maybe you  
 22 can -- maybe through Family Federation you can  
 23 find out how these three sons did not do -- did  
 24 not fulfill their responsibility with the  
 25 positions that they were entrusted with in

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1 Korea.  
 2 So do not try to understand my  
 3 argument with human understanding. Try to  
 4 understand it from God's perspective and from  
 5 God's thoughts.  
 6 MR. HYUN OOK SUH: Objection. I  
 7 think that that was not accurate.  
 8 My argument is that do not try to  
 9 think with human intellect, and we need to  
 10 attend God and to listen and learn from  
 11 God.  
 12 A So to reach that point, my sons still  
 13 had a long way to go. That's why I didn't -- I  
 14 disagreed, and I did not sign the document.  
 15 Q Do you recall whether the  
 16 Reverend Moon ever said publicly that Sean Moon  
 17 was not ready after this video was made in  
 18 2010?  
 19 A He never mentioned that in a public  
 20 forum after that day because he was not in good  
 21 health.  
 22 Q What about prior to that day? Did he  
 23 ever mention that Sean Moon was not ready to  
 24 assume the role as successor?  
 25 A I don't know.

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1 Q I want you to listen to the video  
 2 here very carefully because the Reverend Moon  
 3 is talking and then you talk. And I'd like you  
 4 to tell me what it is that you hear yourself  
 5 saying.  
 6 (Video playing)  
 7 Q Did you hear what you said there?  
 8 A Yes, I did.  
 9 Q What did you say?  
 10 A You know, he was writing, and I was  
 11 correcting what was written wrong.  
 12 Q What were you correcting?  
 13 A Well, why don't you listen.  
 14 Q I don't understand Korean.  
 15 A I mean, it says destroyer.  
 16 Q So was -- I need to know what you  
 17 said. I can play it for you again, if you'd  
 18 like me to.  
 19 Why don't you go back, and we'll play  
 20 it one more time.  
 21 (Video playing)  
 22 A I only said "destroyer."  
 23 Q Did he not write the word "destroyer"  
 24 on the paper, or did he misspell it?  
 25 A Well, I don't know why you keep

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1 asking questions about this. While he was  
 2 writing, I was correcting him because due to  
 3 his age, he was not able to come up with words  
 4 sometimes.  
 5 So the word that he wanted to use was  
 6 "destroyer," and that's what I told him. So  
 7 what's the issue?  
 8 Q I'm going to go to a different part  
 9 here, and this is another section where you say  
 10 something. I'd like you to listen to it, and  
 11 you tell me what it is that you're saying.  
 12 (Video playing)  
 13 Q Could you hear that okay?  
 14 A Yes.  
 15 Q So I believe you said something about  
 16 this being a strong message or a strong  
 17 statement?  
 18 A Yes.  
 19 Q Why was this in your view a strong  
 20 statement?  
 21 A Well, due to the words that were  
 22 used, "heretic" and "destroyer," they were  
 23 strong words. So if you are to post it on the  
 24 Internet, this was an issue between the  
 25 siblings; so it wasn't going to benefit anyone.

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1 Q So were you saying it's a strong  
 2 statement because you didn't want him to  
 3 publish it, or were you saying it's a strong  
 4 statement because you agreed that it needed to  
 5 be strong?  
 6 MR. ROSENFELD: Objection. Form.  
 7 A I didn't want that to be posted on  
 8 the Internet, and also the message was too  
 9 strong.  
 10 One world and one culture. The  
 11 mankind was one family with heavenly parents at  
 12 the center, and if you post or if you announce  
 13 fights between siblings all over the world, who  
 14 is it good for? Who's going to like it? Only  
 15 Satan.  
 16 My intention was two sides to come to  
 17 an understanding and to become one.  
 18 MR. HYUN OOK SUH: Just one  
 19 objection. I think it's not one world but  
 20 it's a unified world. That carries quite  
 21 a significant meaning.  
 22 So the only change I would make is  
 23 the objective is to realize a unified  
 24 world, a unified culture, and a unified  
 25 world of Heavenly Parent. And also we

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1 want to have brothers who are united  
 2 centering on God.  
 3 If the brothers are fighting one  
 4 another, who would like it? Only Satan  
 5 would like it.  
 6 If possible, I wanted both to come to  
 7 an understanding and unite as one. That's  
 8 what I wanted to do.  
 9 MR. POLAK: Let the record reflect  
 10 that I played the video clip on this  
 11 exhibit from three minutes and five  
 12 seconds to three minutes and 30 seconds on  
 13 the video.  
 14 Q Mrs. Moon, at the end of that clip  
 15 that you were watching, I believe you started  
 16 asking the Reverend Moon to write something  
 17 about how only the president of the World  
 18 Mission Headquarters should be obeyed.  
 19 Do you recall hearing that in the  
 20 clip? I can play it again for you if you'd  
 21 like me to.  
 22 MR. HYUN OOK SUH: There's a  
 23 difference between World Mission  
 24 Headquarters and world president. What  
 25 was mentioned was World Mission

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1 Headquarters.  
 2 MR. ROSENFELD: Jonathan, I know I  
 3 told you we'd go till --  
 4 MR. POLAK: Can I get an answer to  
 5 the question?  
 6 MR. ROSENFELD: Oh. I'm sorry.  
 7 Sure.  
 8 MR. POLAK: I know where you're  
 9 going. We'll end up at that time.  
 10 MR. ROSENFELD: I did want to ask you  
 11 a question.  
 12 A So what was the question again?  
 13 MR. POLAK: Could you read it back.  
 14 It was a long one.  
 15 (Record read.)  
 16 A Yes, that's what I wanted to put in.  
 17 Q Why?  
 18 A Well, the Unification Church family  
 19 members all over the world, what would they  
 20 think when -- if the two sons of the True  
 21 Parents could not unite and they were, both,  
 22 each claiming that they were successors and the  
 23 older son. So, I mean, I was thinking of a way  
 24 to address this issue.  
 25 Q So if I understand you correctly,

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1 Mrs. Moon, what you were trying to accomplish  
 2 was that people would listen to Sean Moon and  
 3 not president -- I'm sorry, not Preston Moon?  
 4 A Well, Sean was the president of the  
 5 World Mission Headquarters, and Preston was in  
 6 charge of GPS [sic] which was -- GPF which was  
 7 external business. So Sean was basically in  
 8 charge of the internal business.  
 9 So it was -- the Unification Church  
 10 members had to listen to Sean in order to go  
 11 about with their religious life without  
 12 confusion.  
 13 MR. HYUN OOK SUH: Objection. I  
 14 think she omitted two very important  
 15 passages that mother said, and also the  
 16 subsequent translation was not accurate.  
 17 Prior to this translation, what  
 18 Mother Moon mentioned is that since Sean  
 19 Moon was appointed as international  
 20 president, my hope was that Preston would  
 21 listen to Sean's words.  
 22 And after that what she said is, as  
 23 an additional explanation, is that since  
 24 Sean was in charge of the church and  
 25 international headquarters, as an

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1 international president, at that time  
 2 Preston was in charge of GPF which was in  
 3 charge of external activities.  
 4 Therefore, if Preston could listen to  
 5 the more internal international  
 6 president's words, then members around the  
 7 world would not have any confusion. It  
 8 was the best way to practice our faith.  
 9 This is the reason why I mentioned this.  
 10 MR. POLAK: Jim.  
 11 MR. ROSENFELD: I was just to going  
 12 to say, I may have overpromised. I told  
 13 you 5:00 o'clock, but I'm told what  
 14 Mrs. Moon suggested was one hour which  
 15 we're past. So I just want to make sure  
 16 she was okay. It's almost 5:00 o'clock  
 17 anyway but...  
 18 MR. POLAK: I'll tell you that I'm  
 19 ready to stop for today --  
 20 MR. ROSENFELD: Okay.  
 21 MR. POLAK: -- but I appreciate you  
 22 saying what you said.  
 23 So I think tomorrow we can start at  
 24 9:00 o'clock again. Does that work?  
 25 There were -- I wanted to go back and

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1 address this issue of the service. Since  
 2 that was on the record and since you  
 3 stated objections, I want to make it very  
 4 clear. I know that and I recognize and  
 5 acknowledge that you asked me to tell you  
 6 whether we were going to do that. At the  
 7 time that you said it to me, I did not  
 8 have an intention of doing it.  
 9 But I remember I did send you an  
 10 E-mail, and I said will you accept  
 11 service. I never got any response back  
 12 from that. It became pretty clear to me  
 13 that, especially after hearing Mrs. Moon's  
 14 testimony about how she's here not really  
 15 for this deposition but she's here in the  
 16 country for business -- church business,  
 17 that it made sense to go ahead and serve  
 18 her.  
 19 So I appreciate the fact that you  
 20 have a different point of view on that,  
 21 and you could object to it, but that's the  
 22 reason why we went ahead and served her  
 23 with the summons, because she's here.  
 24 You're not accepting service on her  
 25 behalf. We hadn't gotten an indication

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1 that anybody else was accepting service on  
 2 her behalf. And because she's here  
 3 generally in the country for church  
 4 business, I think it made sense to go  
 5 ahead and serve her.  
 6 And I'll say Mr. Kim -- or Dr. Kim is  
 7 sitting here right now. I have a summons  
 8 here for him. He's a named defendant in  
 9 that case. I can hand it to him here  
 10 today, unless one of you wants to accept  
 11 service for it. But I think we need to go  
 12 ahead and accomplish that.  
 13 MR. ROSENFELD: I'll just respond.  
 14 Since you put that on record, I'll respond  
 15 on the record.  
 16 I think you'll find, if you look at  
 17 the E-mail chain, I did respond. I  
 18 absolutely did respond. If you didn't get  
 19 it, there's some technical problem.  
 20 And I asked you to let us know -- to  
 21 your last E-mail I asked you to let us  
 22 know. The reason was we wanted you to --  
 23 we were going to suggest that -- you know,  
 24 we were considering perhaps someone else  
 25 could accept service rather than have you

1 do that on the record with --  
 2 MR. POLAK: I will tell you, I did  
 3 not see that. And if you sent that and I  
 4 missed it, then I apologize for that, but  
 5 I don't recall seeing that. And if that  
 6 offer had been made, I would have taken it  
 7 up, but I did -- honestly, I did not see  
 8 that E-mail from you.

9 But, regardless, it doesn't really  
 10 matter as much since I think, you know,  
 11 it's been accomplished.

12 So why don't we go ahead, and I do  
 13 need to know what to do about Dr. Kim, but  
 14 it sounds to me as if -- if that was your  
 15 intention, regardless of whether I saw the  
 16 E-mail or not, to have someone else accept  
 17 service, I'd like to go ahead and get that  
 18 accomplished now.

19 MR. ROSENFELD: All right. Let us  
 20 just caucus for a moment, and we can go  
 21 off the record.

22 MR. POLAK: That's fine. All right.

23 THE VIDEOGRAPHER: We're going off  
 24 the record. The time is 4:55 p.m.

25 (Time noted: 4:55 p.m.)

CERTIFICATE

1  
 2  
 3 STATE OF New York )  
 4 :ss  
 5 COUNTY OF RICHMOND )

6  
 7 I, RITA M. PERSICHETTY, a Notary Public  
 8 within and for the State of New York, do hereby  
 9 certify:

10 That HAK JA HAN MOON, the witness whose  
 11 deposition is hereinbefore set forth, was duly  
 12 sworn by me and that such deposition is a true  
 13 record of the testimony given by such witness.

14 I further certify that I am not related to  
 15 any of the parties to this action by blood or  
 16 marriage; and that I am in no way interested in  
 17 the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set my  
 19 hand this 1st day of April, 2019.

20  
 21  
 22  
 23  
 24 \_\_\_\_\_  
 25 RITA M. PERSICHETTY