

IN THE CIRCUIT COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

CASE NO.: 16-2015-CA-005978
DIVISION: CV-H

JOEL D. KLENCK,

Plaintiff,

v.

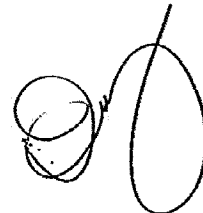
AMERICAN SCHOOLS OF ORIENTAL
RESEARCH, ARK SEARCH, LLC,
GARY A. BATES, AMY LOUISE BEAM,
RICHARD CARL BRIGHT, ERIC H.
CLINE, CREATION MINISTRIES
INTERNATIONAL, GRETCHEN M.
FOUCHECOURT, MICHAEL S. HEISER,
LIBERTY UNIVERSITY, ONE.COM, JOHN
RANDALL PRICE, ANDREW TSAI,
CARL WIELAND, DON ROSS
PATTON, ANDY CHI KIT WONG,

Defendants.

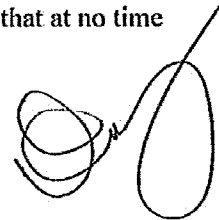
DECLARATION OF EVA NG

Eva Ng, of full age, declares under penalty of perjury pursuant to § 92.525, Fla. Stat., that the foregoing is true and correct:

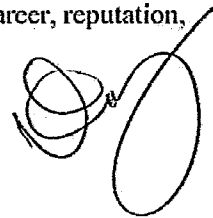
1. My name is Eva Ng, I am over eighteen years of age, and the following is based upon my personal knowledge.
2. From 2008 to the current period, myself and others have wanted government officials and scientists to protect, preserve, and continue research at large archaeological structures on Mount Ararat at elevations more than 4,000 meters above sea level.



3. I am the Director of Noah's Ark Ministries International Limited associated with The Media Evangelism Limited in Hong Kong.
4. Beginning in October of 2008, with Yiu Fai LEE joined in October 2009, members of our organization and their associates have climbed, entered, filmed, and photographed enormous archaeological structures, made of wood, with hundreds of artefacts, on greater Mount Ararat, at elevations more than 4,000 meters above sea level that we believe to be Noah's ark.
5. As I am privy to all reports on the site, I know these structures on Mount Ararat were difficult to access, on greater Mount Ararat in eastern Turkey, at elevations more than 4,000 meters above sea level (or greater than 13,123 feet), and found many meters under the surface of the mountain.
6. Now, the sites are under extreme threat from the recent melting of the ice near the summit of Mount Ararat and the receding glacier. The site on Mount Ararat is decaying and warping, which threatens both the preservation of the wood architecture at the site and the artefacts such as wood bowls, bone implements, seeds, and cords made of organic material.
7. After the discovery was announced, which we believed to be Noah's ark, the defendants in this lawsuit: John Randall Price, Don Ross Patton, and Richard Bright, Amy Louise Beam, Andrew Tsai, Andy Chit Kit Wong, and others published entire websites and social media content making false statements about our group that we were engaged in a hoax or supported a hoax.
8. One report asserted the group had arranged for the construction of the wood structures on Mount Ararat as a movie set.
9. These assertions are absolutely false. I state under the penalty of perjury, that at no time did any of our group construct any sites on Mount Ararat.

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10. At no time did any of our group carry any artefacts or materials resembling artefacts to the sites on Mount Ararat.
11. At no time did any of our group prepare or stage a locale to film a movie on Mount Ararat.
12. At no time did any of our group hear of any recently manufactured sites on Mount Ararat.
13. Instead, I assert under the penalty of perjury, that our organization filmed and photographed enormous wood structures, wood architecture, organic artefacts, that were already there on Mount Ararat before our personnel and film crews arrived.
14. To wit, the wood structures are located at elevations above 4,000 meters (13,123 feet) above sea level, in hazardous locations, in very cold temperatures, near the summit of greater Mount Ararat in eastern Turkey, accessible by narrow, angled passages, many meters beneath the surface of the site. These passages lead to enormous wood structures with storage areas and animal pens that must weigh thousands of tons, under many meters and hundreds of tons of ice and rock layers.
15. Further, the artefacts at the Ararat site are old: bone tools, stone tools, flax cords, small seeds, wood architecture with wood pegs and joinery, and in no way suggest that the site or artefacts at the sites on Mount Ararat are modern or recently constructed.
16. Later, Dr. Joel Klenck confirmed the locations and the archaeological periods of the sites and artifacts on Mount Ararat. Klenck was then subjected to horrible attacks and abuse because of his background and current profession in archaeology and because he accurately reported and defended the site in English.
17. Defendants in this lawsuit including Amy Beam, Randall Price, Richard Bright, Don Patton, Andy Chi Kit Wong, Andrew Tsai and others have tried to destroy career, reputation,

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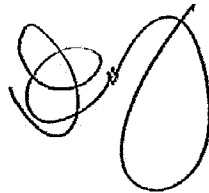
and personal relationships of Joel Klenck by publishing many websites against Klenck showing much of his private materials.

18. But Dr. Klenck is telling the truth and the defendants are lying. There are huge wood constructions, more than 4,000 meters above sea level, on greater Mount Ararat, and contain archaeological features, architecture, and artefacts.

19. In addition to Klenck, eighteen (18) other individuals have entered the archaeological structures on Mount Ararat from five countries. Some of these persons are frightened to come forward because the defendants so targeted Klenck with lies and by publishing his private materials on so many websites.

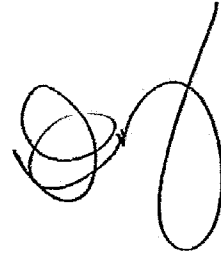
20. I have faith that this Court will find the defendants liable in this law suit so the archaeological sites on Mount Ararat will be protected, that scientists and government officials will be able to conserve and research the archaeological sites on Mount Ararat without fear of being attacked, lied about, and their personal information published on the World Wide Web, as the defendants have done to Dr. Klenck.

21. I have attached a copy of my identification card or passport, which confirms my identity. It is attached as Exhibit "A".

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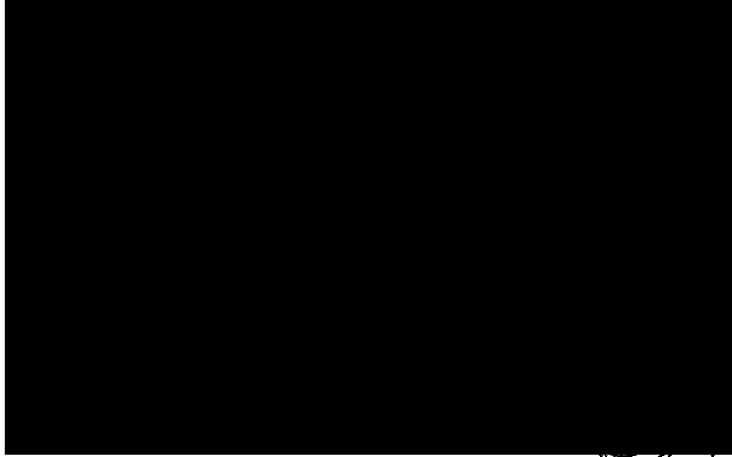
Section 92.525, Fla. Stat. Verification, In Lieu Of Notary Seal

Pursuant to § 92.525, Fla. Stat. (Verification of documents; perjury by false written declaration), and under penalties of perjury, I declare that I have read the foregoing Affidavit and that the facts stated in it are true.

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EVA NG

EXHIBIT A: IDENTIFICATION OF EVA NG



(Handwritten scribbles)