

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.

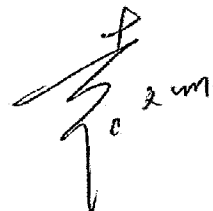
AMERICAN SCHOOLS OF ORIENTAL
RESEARCH, ARK SEARCH, LLC,
GARY A. BATES, AMY LOUISE BEAM,
RICHARD CARL BRIGHT, ERIC H.
CLINE, CREATION MINISTRIES
INTERNATIONAL, GRETCHEN M.
FOUCHECOURT, MICHAEL S. HEISER,
LIBERTY UNIVERSITY, ONE.COM, JOHN
RANDALL PRICE, ANDREW TSAI,
CARL WIELAND, DON ROSS
PATTON, ANDY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

Defendants.

DECLARATION OF YUEN MAN FAI

Yuen Man Fai, 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 Yuen Man Fai, I am over eighteen years of age, and the following is based upon my personal knowledge.
2. I participated in several explorations on greater Mount Ararat, in eastern Turkey, during October of 2009 and June of 2015.
3. During these occasions, I was joined first by Ahmet Ertugrul, several Turkish citizens, and several individuals from Hong Kong, and later by a similar group, individuals from the Peoples Republic of China, and John Moen.
4. At elevations more than 4,000 meters above sea level on greater Mount Ararat, I entered and explored two enormous wood structures.

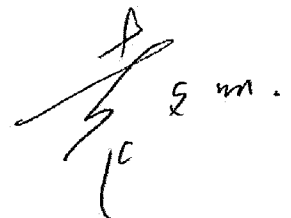


5. These structures on Mount Ararat were very difficult to get to and were at elevations more than 4,000 meters above sea level (or greater than 13,123 feet), on greater Mount Ararat, in eastern Turkey. To reach the structures many meters under the surface of the mountain, I had to use a rope and have assistance to get to the structures. The wood structures were built of wood beams, displayed wood joints, namely mortise-and-tenon joints, and showed wood planks connected into wood sockets covered by a mud-like material. The structures are archaeological because it is impossible to have recently constructed the structures at the Ararat locations because the wood structures are very large, comprise enormous wood planks, weigh many tons, are only accessible by narrow holes that are sharply angled from the surface, many meters under the surface of the Mountain, and are covered by hundreds of tons of rock and ice layers. The site is old because the wood is rotting, there are no modern materials at the site, and the architecture, artefacts, and building methods reflect ancient assemblages.

6. After myself and other announced the discovery, the defendants in this law suit: Amy Louise Beam, John Randall Price, Don Ross Patton, and Richard Bright, Andrew Tsai, Andy Chit Kit Wong, and others published websites or social media content making false statements about our group that we were supporting a hoax and a fraud, that the site was modern, and that we were lying.

7. Later, Dr. Joel Klenck confirmed the locations and supported the authenticity of the archaeological sites on Mount Ararat. Klenck was then treated more harshly and was attacked by the defendants because he spoke English, was educated at Harvard, and was an archaeologist. Amy Beam, Randall Price, Richard Bright, and Don Patton, Andy Chi Kit Wong, Andrew Tsai and others attempted and are continuing to try to destroy the reputation, career, and family life of Dr. Klenck by publishing many websites attacking Klenck.

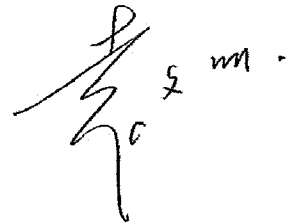
8. Dr. Klenck is telling the truth and the defendants are lying. I have personally entered the archaeological structures on Mount Ararat, which are huge wood constructions, more than 4,000 meters above sea level, on greater Mount Ararat, and contain old archaeological features, architecture, and artefacts.

Handwritten signature and initials, possibly "A" and "JC", with some scribbles and the letters "S" and "m" nearby.

9. Now, nineteen (19) eyewitnesses have been to the archaeological features on Mount Ararat. These eyewitnesses included Dr. Klenck and three other professional archaeologists. The direct witnesses of the site come from Belgium, the Netherlands, Peoples' Republic of China, Republic of Turkey, and the United States representing many ethnicities. But several eyewitnesses after entering the site and researching the materials are frightened to report the structure because of the defendants' abuse and attacks on Dr. Klenck. Also, it is difficult to publish anything about the site because the defendants' lies and attacks on individuals trying to preserve these archaeological sites on Mount Ararat.

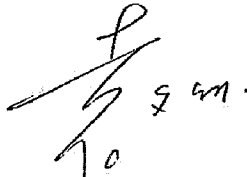
10. I hope this Court makes the defendants accountable so the archaeological sites on Mount Ararat will be protected, the defendants will stop persecution and lying about us, and that scientists and government officials will be able to protect, preserve, and research the archaeological sites on Mount Ararat without fear of being attacked or their reputations hurt by the defendants.

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

Handwritten signature and initials, possibly "P. Klenck" or similar, with a small "5" and "m" to the right.

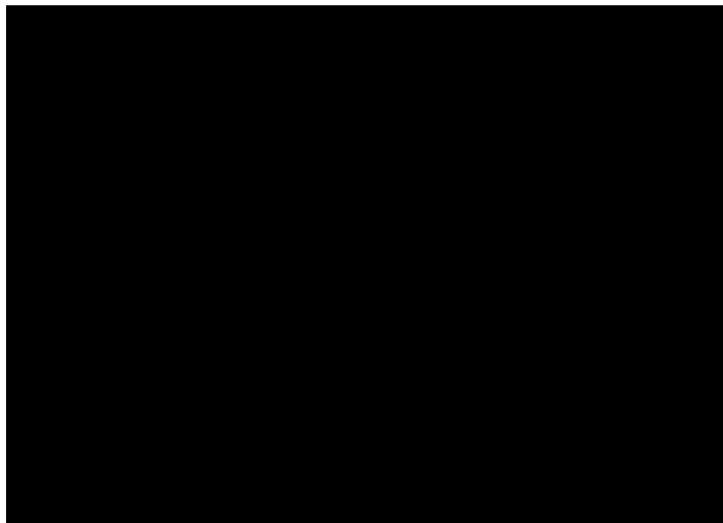
Section 92.525, Fla. Stat. Verification, In Lieu Of Notary Seal

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.



YUEN MAN FAI

EXHIBIT A: IDENTIFICATION OF YUEN MAN FAI



Handwritten marks, including a checkmark and a vertical line with a downward-pointing arrow, are visible to the right of the redacted area.