

1  
2  
3  
4  
5  
6  
7  
8 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
9 FOR THE COUNTY OF WASHINGTON

10 BEAVERTON GRACE BIBLE  
11 CHURCH, an Oregon non-profit  
12 organization; and CHARLES O'NEAL,  
13 an individual,

14 Plaintiffs,

15 v.

16 JULIE ANNE SMITH, HANNAH SMITH,  
17 KATHY STEPHENS, JASON  
18 STEPHENS, and MEAGHAN VARELA  
19 individuals;

20 Defendants.

No. C121174CV

AMENDED COMPLAINT  
(Defamation)

PRAYER FOR AMOUNT:  
\$500,000

\$505.00 – Filing Fee  
Per Ch. 595, Sec. 15(1)(c)

NOT SUBJECT TO  
MANDATORY  
ARBITRATION

21 For their claim for relief against defendants, plaintiffs allege as follows:

22 JURISDICTIONAL FACTS:

23 1.

24 Beaverton Grace Bible Church is a duly registered Oregon non-profit organization.

25 2.

26 Charles O'Neal is an individual who resides in Washington County, Oregon and  
who, at all material times, has served as pastor of Beaverton Grace Bible Church.

///

1 3.

2 Julie Anne Smith is an individual who currently resides in Benton County,  
3 Washington; and who previously attended Beaverton Grace Bible Church.

4 4.

5 Hannah Smith is an individual who currently resides in Oregon; and who previously  
6 attended Beaverton Grace Bible Church.

7 5.

8 Kathy Stephens is an individual who currently resides in Washington County,  
9 Oregon; and who previously attended Beaverton Grace Bible Church.

10 6.

11 Jason Stephens is an individual who currently resides in Washington County,  
12 Oregon; and who previously attended Beaverton Grace Bible Church.

13 7.

14 Meaghan Varela is an individual who currently resides in Washington County,  
15 Oregon; and who previously attended Beaverton Grace Bible Church.

16 8.

17 Transactions material to these claims for relief occurred in Washington County,  
18 Oregon and over the internet.

19 **OPERATIONAL FACTS**

20 9.

21 On or about 2010, defendants and each of them began posting defamatory  
22 messages on the internet defaming both Beaverton Grace Bible Church and Charles  
23 O'Neal.

24 ///

25 ///

26 ///

1  
2 These messages consisted of, but were not limited to, the following false and  
3 defamatory allegations:

4 a) April 8, 2011 – Julie Anne Smith posted a message stating that the pastor has  
5 “chosen to mislead the congregation” and “destroy relationships.” It also accuses the  
6 pastor of “narcissism in the pulpit.”

7 b) September 29, 2011 – Julie Anne Smith posted a message stating that the  
8 “church” uses “control tactics” and “You will be fine at this church if you never question the  
9 elders or pastor.”

10 c) December 14, 2011 – Julie Anne Smith posted a message stating, “Something  
11 creepy about this church.”

12 d) December 20, 2011 – Julie Anne Smith posted a message stating that “the  
13 pastor of this church thrives on control” and that “sadly, BGBC is more about the reputation  
14 of the pastor than real church” and “It is important for people to have an understanding of  
15 why this church is not a healthy place and would shout from the rooftop if my review  
16 prevents another family from getting sucked into the spiritual abusive environment and  
17 false teaching presented by the current pastor.” It specifically targets the pastor: “To  
18 Chuck: if you would have manned up and acknowledged that we were parting ways  
19 because we weren’t seeing eye-to-eye on certain issues, you never would have heard from  
20 us again. But for you to lie to the congregation . . .” and “I am calling you out as a Wolf for  
21 lying . . .” and “we had information that would be damaging to your reputation . . .” Also  
22 states “You are really brilliant, Chuck, but not so brilliant. Quite a few people can see  
23 through the false teaching and self-aggrandizement.”

24 e) December 22, 2011 – Julie Anne Smith republished the same message from  
25 December 20, 2011, quoted above.

26 ///

1 f) December 28, 2011 – Julie Anne Smith republished the same messages from  
2 December 20 and 28, 2011, quoted above.

3 g) January 4, 2012 – Julie Anne Smith posted a message stating “Leaders of cults  
4 convince their people that their church is the only true place to be . . .” and “turn a blind eye  
5 to known sex offenders in the church...” The message accuses the church of “spiritual  
6 abuse,” and states “I am working on compiling numerous pages of notes that were taken  
7 over the time we were active at this church . . . this will be posted to a website for all to see  
8 . . .”

9 h) January 5, 2012 – Julie Anne Smith republished the message from January 4,  
10 2012, adding “What we had was indoctrination . . . That is how cult leaders work. Don’t  
11 waste your precious lives and relationships by being held emotionally/spiritually captive at  
12 this so-called church.”

13 i) January 9, 2012 – Julie Anne Smith republished the messages from January 4  
14 and 5, 2012, adding “. . . how can she forget that her own beloved pastor knew about a sex  
15 offender in the church who had access to the nursery and children on a weekly basis and  
16 did not have any safeguards in place.”

17 j) January 13, 2012 – Julie Anne Smith republished message from January 4, 5,  
18 and 9, 2012.

19 k) January 20, 2012 – Julie Anne Smith posted a message stating that “This is a  
20 very destructive and disturbing “church.” . . . The extra-Biblical legalistic teaching is wrong.  
21 The gossip/slander, disclosure of what goes on in private counseling sessions, sex  
22 offenders having free reign in childrens’ areas with no disclosure to parents . . . This is not  
23 a safe place.”

24 l) February 24, 2012 – Julie Anne Smith stated on her blog that people had  
25 “suffered at the hands of the pastor of Beaverton Grace Christian Church.”

26 ///

1 m) February 25, 2012 – Julie Anne Smith stated on her blog that “lives are at risk”  
2 due to the “abuse of power going on” at Beaverton Grace Christian Church.

3 n) March 1, 2012 – Julie Anne Smith stated on her blog that Chuck O’Neal was a  
4 liar who “was forced to fabricate a lie that we were under church discipline.”

5 o) March 3, 2012 – Julie Anne Smith stated on her blog that the pastor “abused”  
6 them, that they were “spiritual abuse victims” and that “spiritual lives are at stake.”

7 p) March 20, 2012 – Julie Anne Smith stated on her blog that Beaverton Grace  
8 Christian Church had an “oppressive and abusive environment.”

9 q) March 30, 2012 – Julie Anne Smith stated on her blog that a “former pastor” was  
10 “interfering in our lives.”

11 r) January 10, 2012 – Jason Stephens posted a review on DEX stating “I am  
12 someone this church is shunning too. A practice they use when you question or just don’t  
13 agree with the pastor.”

14 s) January 12, 2012 – Jason Stephens republished on Google the above message  
15 from January 10, 2012.

16 t) December 11, 2011 – Hanna Smith posted a review on Google stating “Chuck  
17 micro-manages everything down to the tiniest detail, like having to have EVERY song  
18 approved by him before its sung. But he ignores, or shoves under the carpet dangerous  
19 activities and bullies people to get his way . . . that is no-way Biblical. Grace is the Last  
20 thing you’ll find at that church.

21 u) May 17, 2010 – Kathy Stephens posted a comment to the blog Suspicious  
22 Berean ([www.suspiciousberean.blogspot.com](http://www.suspiciousberean.blogspot.com)) stating that “You should be suspicious of  
23 him because Chuck O’Neal is a wolf.” This comment has been published continuously from  
24 May 17, 2010 and is still published.

25 ///

26 ///

1 v) May 19, 2010 – Kathy Stephens posted a comment to the blog Suspicious  
2 Berean stating that “Yes, He’s definitely a wolf,” referring to Charles O’Neal. This comment  
3 has been published continuously from May 19, 2010 and is still published.

4 w) November 2, 2010 – Kathy Stephens posted a review on Google stating “bad  
5 place, don’t take yourself or your family to this hell whole [sic]” This has been published  
6 continuously from November 2, 2010 and is still published.

7 x) March 29, 2012 – Meaghan Varela posted a comment to  
8 [www.bgbcsurvivors.blogspot.com/2012/03/comparing-two-part-2.html](http://www.bgbcsurvivors.blogspot.com/2012/03/comparing-two-part-2.html) falsely stating that  
9 “Chuck yelled all kinds of reviling remarks about us” and came to her house with “a mob of  
10 30 or more” with “hatred in their faces.” She also stated that people at the church were  
11 “being blindly persecuted.” This comment has been published continuously from March 29,  
12 2012 and is still published. Varela also posted that many folks were abused at Beaverton  
13 Grace Christian Church and that the website was established by Julie Anne Smith  
14 exposing the darkness and deception that existed at Beaverton Grace Bible Church. This  
15 comment has been published continuously from March 29, 2012 and is still published.

16 y) March 31, 2012 - Meaghan Varela posted a comment to  
17 [www.bgbcsurvivors.blogspot.com/1012/03/chuck-oneal-secretly-recorded-private.html](http://www.bgbcsurvivors.blogspot.com/1012/03/chuck-oneal-secretly-recorded-private.html)  
18 stating that she was harassed by church members. This comment has been published  
19 continuously from March 31, 2012 and is still published.

20 z) April 3, 2012 – Meaghan Varela posted a comment to  
21 [www.bgbcsurvivors.blogspot.com/2012/04/disobedient-children-and-metings-with.html](http://www.bgbcsurvivors.blogspot.com/2012/04/disobedient-children-and-metings-with.html)  
22 stating that “I cry for the abuse I allowed my children to endure because I was doing what I  
23 and my husband thought was the right thing to do . . .” and that her children suffered  
24 “humiliation and shame.” This comment has been published continuously from April 3,  
25 2012 and is still published.

26 ///

1 aa) April 5, 2012 – Meghan Varela posted a comment to  
2 www.bgbcsurvivors.blgospot.com/2012/04/no-talk-rule-is-not-allowed-here.html stating that  
3 members of the church were being “spiritually abused” and “silenced through fear.” This  
4 comment has been published continuously from April 5, 2012 and is still published.

5 11.

6 The above accusations were false.

7 12.

8 Both plaintiffs possess a substantial pecuniary interest in their good name, honor,  
9 integrity, standing in the community and in avoiding the other stigma or disability that would  
10 attach to and result from the defamatory statements related to their roles in the community.

11 13.

12 The above false and defamatory statements also related to O’Neal’s performance  
13 of his job as pastor at Beaverton Grace Bible Church.

14 14.

15 The accusations against O’Neal were false in fact and in innuendo and imposed a  
16 stigma of personal and professional misconduct upon O’Neal.

17 15.

18 Defendants acted with reckless disregard as to whether their accusations, as  
19 alleged above, were truthful or not.

20 16.

21 The allegations described above were published on the internet and widely  
22 circulated.

23 17.

24 Defendants’ statements quoted above were motivated by a desire to retaliate  
25 against plaintiffs.

26 ///







1  
2  
3  
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
5 FOR THE COUNTY OF WASHINGTON  
6

7 BEAVERTON GRACE BIBLE CHURCH,  
8 an Oregon non-profit organization; and  
9 CHARLES O'NEAL, an individual,

10 Plaintiffs,

11 v.

12 JULIE ANNE SMITH, HANNAH SMITH,  
13 KATHY STEPHENS, JASON  
14 STEPHENS, and MEAGHAN VARELA  
15 individuals;

16 Defendants.

No. C121174CV

CERTIFICATE OF SERVICE

17 I, Roger Hennagin, hereby certify that I served a true and correct copy of  
18 AMENDED COMPLAINT on:

19 Linda K. Williams  
20 Attorney at Law  
21 10266 S.W. Lancaster Road  
22 Portland, Oregon 97219

Herbert G. Grey  
Attorney at Law  
4800 S.W. Griffith Drive, Suite 320  
Beaverton, Oregon 970054-8716

23 by placing a copy thereof in a sealed, first-class, postage prepaid envelope, addressed to  
24 each attorney's last-known address and depositing it in the U.S. mail at Lake Oswego,  
25 Oregon on the date set forth below.

26 DATED this 26<sup>th</sup> day of April, 2012.

ROGER HENNAGIN, P.C.



Roger Hennagin, OSB #73134  
Of Attorneys for Plaintiffs