

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.

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**DECLARATION OF WING CHEUNG YEUNG**

Wing Cheung Yeung, 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 Wing Cheung Yeung, I am over eighteen years of age, and the following is based upon my personal knowledge.
2. I participated in an expedition on greater Mount Ararat, in eastern Turkey, during October of 2009.
3. During these occasions, I was joined by Ahmet Ertugrul, several Turkish citizens, and several individuals from Hong Kong including Andrew YUEN Man Fai.

*Wing Cheung Yeung*

4. At elevations more than 4,000 meters above sea level, I entered and explored two wood structures. One was very large; the other was a corner of a large structure that was also explored by Yiu Fai Lee.

5. These structures on Mount Ararat were at very high elevations and were difficult to access. The structures were above 4,000 meters above sea level and I had to be helped down into the structures using ropes and assistance, through very narrow holes from the surface of the Mountain. The structures were built entirely of wood and were located many meters under the surface on Mount Ararat. The larger structures were inside a much larger wood structures because there were multiple passages from the surface that led to different large wood structures that were close to each other. The structures are archaeological because the wood was decomposing, did not show any modern artefacts, and were constructed using ancient materials including large wood planks, with rounded planks in wood sockets, with joints covered in clay material.

6. After myself and others announced the discovery, the defendants in this law suit including 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 me and others that we were supporting a hoax and a fraud. They attacked us in multiple websites, at conferences, they established entire websites saying that the site was modern, that we were lying, or that were supporting a fraud.

7. Dr. Joel Klenck confirmed the location of the site and with Prof. Oktay Belli attempted to protect, preserve, and support research at the archaeological sites on Mount Ararat. Subsequently, Amy Beam, Randall Price, Don Patton, Richard Bright, and other defendants attacked them. Joel Klenck received the worst of the treatment because he spoke English and was

*Ye Chung*

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an archaeologist educated at Harvard. The defendants attacked Joel Klenck in every aspect of his life and are trying destroy his reputation, career, and even his family life.

8. But Joel Klenck remains courageous and is telling the truth because there are enormous wood structures on greater Mount Ararat, at elevations more than 4,000 meters above sea level, from archaeological periods.

9. The defendants in this suit are lying. I am a direct eyewitness and personally entered the structures on Mount Ararat, which are huge wood structures, more than 4,000 meters above sea level, on greater Mount Ararat.

10. For me, the defendants' attacks have been very hurtful. It is difficult for me to talk about the pain the defendants have caused me and others.

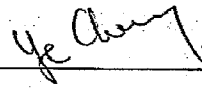
11. I hope this Court makes the defendants accountable so scientists and government officials will be able to discount the defendants' lies and begin protecting, preserving, and researching the archaeological sites on Mount Ararat.

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

*Joel Klenck*

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.



WING CHEUNG YEUNG

EXHIBIT A: IDENTIFICATION OF WING CHEUNG YEUNG



*Ye Cheung*