

2. Plaintiffs Matthew Dickson and Jennifer Dickson (the “Dicksons” or “Plaintiffs”) are former members of the Christian religious order, GFA. *Id.* ¶¶3-5.

3. Mr. Dickson is also a former employee of GFA. *Id.* ¶5.

4. Contemporaneous with Mr. Dickson’s commencement of his employment with GFA, Mr. Dickson signed a Statement of Agreement (“Agreement”) that included an agreement to arbitrate any dispute related to his relationship with GFA. *Id.* ¶3 and Ex. 1-A. Mr. Dickson and Mrs. Dickson signed updated Statements of Agreement in 2009. *Id.* ¶4 and Exs. 1-B and 1-C. True and correct copies of the Dicksons’ signed Statements of Agreement are attached to the Carroll Dec. and are incorporated herein by reference.

5. Each Plaintiff signed the Agreement, which provides in relevant part:

I agree that any and all disputes of any kind arising out of the relationship between myself and GFA, or any other GFA member, shall be resolved by way of conciliation, or mediation, the parties agreeing that the matter will be submitted to final and binding arbitration in accordance with the rules and procedures set forth in the Unified Arbitration Act. Accordingly, I knowingly and willingly waive any and all rights to initiate any action before any administrative agency or court of law or equity.

Ex. 1-A at p. 4, Exs. 1-B and 1-C at p. 3 (emphasis added).

6. Plaintiffs filed this action alleging violations of the Racketeer Influenced and Corrupt Organizations (“RICO”) Act, common law fraud, violations of the Arkansas Deceptive Trade Practices Act (“ADTPA”), and unjust enrichment. *See generally* Complaint.

7. The Agreement is a valid arbitration agreement and the dispute is within the arbitration agreement’s scope.

8. Arbitration should be compelled pursuant to the Federal Arbitration Act (the “FAA”), 9 U.S.C. § 1 *et seq.*

9. The case should be stayed in favor of arbitration pursuant to Section 3 of the FAA.

10. Defendants are submitting a brief in support of this motion.

WHEREFORE, Defendants Gospel for Asia, Inc., Gospel for Asia-International, K.P. Yohannan, Gisela Punnose, Daniel Punnose, David Carroll, and Pat Emerick pray the Court: (i) compel Plaintiffs to arbitrate the claims; and (ii) stay this proceeding pursuant to 9 U.S.C. § 3 until such arbitration has been had in accordance with the terms of the agreement to arbitrate.

DATED: April 15, 2016.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that, on April 15, 2016, I electronically filed the foregoing document with the Clerk of the Court, to be served by operation of the Court's electronic filing system on the attorneys of record.

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Counsel for Plaintiffs & the Class

/s/ Steven Shults
Steven Shults

3. Attached hereto as Exhibits 1-A is the “Statement of Agreement” signed by Matthew Dickson on or about July 30, 2007. That agreement was signed contemporaneous with Mr. Dickson’s commencement of his employment with GFA.
4. Attached hereto as Exhibits 1-B and 1-C, respectively, are updated “Statements of Agreement” signed by Matthew Dickson (Ex. 1-B) and Jennifer Dickson (Ex. 1-B) on or about March 18, 2009.
5. Matthew Dickson was employed by GFA for nearly five (5) years, from 2007 – 2012. While Matthew Dickson was employed by GFA, he and his wife were part of the GFA community in Carrollton, Texas. Accordingly, it is my understanding that, in addition to performing under the Statements of Agreement in Texas, Matthew Dickson and Jennifer Dickson each signed and entered into each of those agreements in Texas.
6. From 2004 – 2014, Matthew Dickson and Jennifer Dickson made donations to GFA.
7. In addition to Mr. Dickson receiving employment, the Dicksons received training and other benefits by signing the Statements of Agreement and becoming members of GFA.
8. Based on his membership in the GFA Christian religious order, Matthew Dickson applied for a tax exemption, and GFA sent a letter to the IRS related to that application and noted that he was a member in good standing.
9. As a general matter, members of GFA agree to Biblical reconciliation and arbitration.
10. K.P. Yohannan, Gisela Punnose, Daniel Punnose, and Pat Emerick and myself are each committed to Biblical dispute resolution and arbitration.
11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 14, 2016.



David Carroll

STATEMENT OF AGREEMENT

As a Religious Order, Gospel for Asia (GFA) is wholeheartedly committed to reaching the lost in Asia with the Good News of salvation through our Lord Jesus Christ.

MISSION STATEMENT

Gospel for Asia exists for the following purposes:

1. To help evangelize and win to Christ the untold millions in third world Asian countries;
2. To build up Asian believers in Christian faith, character, world evangelism and knowledge of our Lord Jesus Christ;
3. To support by prayer and finances the national ministries of the Gospel of Jesus Christ in Asia;
4. To inform Christians in the West of the needs, and the effectiveness of native missionaries; and to provide opportunities for involvement through prayer, sponsorship, volunteer help, or project giving.
5. To see local New Testament churches planted throughout the Asian countries through the work of native missionaries.

As a member of Gospel for Asia, I agree to give my life totally for the task of reaching the unreached of Asia by working toward the fulfillment of the Missions Statement above. I further agree not to entertain any distractions from this God-given calling, i.e. other job opportunities, ministry opportunities, goals, ambitions, education, vocation, etc.

STATEMENT OF FAITH

WE BELIEVE in the verbal inspiration of the Bible, that both the Old and New Testaments constitute the divinely inspired Word of God, the final authority for life and truth.

WE BELIEVE in one God, eternally existing in the Holy Trinity of Father, Son, and Holy Spirit, each with personality and deity.

WE BELIEVE in the virgin birth of Jesus Christ, His atoning death and glorious resurrection, and in the visible and personal return of Jesus Christ to this earth. We believe that He purchased for us a finished salvation, and it is ours solely by grace through faith. Also, that we are sealed by the Holy Spirit and kept by the power of God through faith unto salvation, ready to be revealed in the last day.

WE BELIEVE that the Holy Spirit convicts, converts and continues the work of grace in a believer. We believe that heaven is the home for God and His children, and that hell is the home for the devil and his children.

WE BELIEVE in New Testament soul winning, the separated Christian life, and the local church.

I agree with the Statement of Faith listed above as affirming my own beliefs and desire to serve in accordance with it. I further agree that should my views change regarding any point of the above Statement of Faith, I will immediately report the change to the appropriate officers.

MORAL CONVICTIONS AND LIFESTYLE

I agree to live my life in a manner morally consistent with Biblical values and commandments and to flee from every appearance of evil. Although some things may be areas of freedom in Christ, I agree to abstain from any social habits that might lessen my ministry effectiveness and ability to represent our Lord and Gospel for Asia, including use of illegal drugs, tobacco, and alcohol, sexual immorality, immodest dress, offensive language, "R" or "X" rated movies, and gambling.

I agree to live frugally at a level necessary to meet my basic needs as set by GFA.

I agree to diligently work at raising and maintaining a prayer and financial support team to cover my total living expenses.

I agree to relate to fellow members of GFA as a family community by residing within close proximity to other members, meeting together regularly for prayer, fellowship, teaching, and encouraging one another, and helping other members as needs arise.

I agree to preserve and promote unity of the Spirit through the bonds of peace, to walk in the light of truth and settle disagreements quickly, Biblically, prayerfully and to never intentionally walk in a manner which would grieve the Holy Spirit.

I agree to make every effort to gather on time for all GFA prayer meetings as well as to uphold the praises and requests of the ministry during personal prayer times.

I agree to submit to the established authority structure of GFA, and to discuss any grievances with my immediate supervisor.

I agree to maintain a daily personal devotional life of Bible reading, worship and prayer.

FURTHER COMMITMENTS AND UNDERSTANDINGS

I agree to serve the Lord through Gospel for Asia for a minimum of two years following the successful completion of my training and probationary period.

I have carefully read and understand the policies put forth in the Gospel for Asia Human Resource Policy and Procedure Handbook and agree to abide by them to the best of my ability. I further understand that failure to do so could result in termination of membership.

I understand that I shall have no authority to enter into any contract or obligation on behalf of GFA, unless authorized by GFA's board of directors to do so.

I agree that any and all disputes of any kind arising out of the relationship between myself and GFA, or any other GFA member, shall be resolved by way of conciliation, or mediation, the parties agreeing that the matter will be submitted to final and binding arbitration in accordance with the rules and procedures set forth in the Unified Arbitration Act. Accordingly, I knowingly and willingly waive any and all rights to initiate any action before any administrative agency or court of law or equity.

This Agreement between Gospel for Asia and the undersigned has been entered into after prayerful consideration on the part of both parties. All commitments contained herein have been made freely and voluntarily. There are no promises made by either party to the other regarding anything not mentioned in this Agreement.

Member's printed name MATTHEW DICKSON

Signature *Matthew Dickson* Date 7/30/07

Training and probationary period were successfully completed on:

_____ Date _____ Department Coordinator

I consider that I first made this commitment when I joined the Order on or about _____ Date

M. Dickson



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through faith. Also, that we are sealed by the Holy Spirit and kept by the power of God through faith unto salvation, ready to be revealed in the last day.

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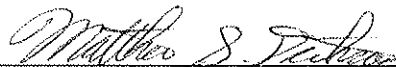
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Print Member Name MATTHEW S. DICKSON

Signature of Member  Date 3/18/09



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Print Member Name Jennifer Dickson

Signature of Member Jennifer Dickson Date 3/18/09