

In The Matter Of:

JERICO BAPTIST CHURCH MINISTRIES, INC.

v.

JOEL R. PEEBLES, SR., ET AL.

DOROTHY LOUISE WILLIAMS - Vol. I

May 26, 2011

MERRILL LAD

1325 G Street NW, Suite 200, Washington, DC
Phone: 800.292.4789 Fax: 202.861.3425

IN THE CIRCUIT COURT
FOR PRINCE GEORGE'S COUNTY, MARYLAND

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JERICO BAPTIST CHURCH MINISTRIES,)
 INC.,)
 Plaintiff/Counter-Defendant,)

v.) Case No.
 JOEL R. PEEBLES, SR., et al.,) CAL 10-33647
 Defendants/Counter-Plaintiffs/)
 Third-Party Plaintiffs,)

V.)
 GLORIA McCLAM-MAGRUDER, et al.,)
 Third-Party Defendants.)

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VIDEOTAPED DEPOSITION OF DOROTHY LOUISE WILLIAMS

Greenbelt, Maryland

Thursday, May 26, 2011

Job Number: 1-199507

Pages: 1 - 157

Reported by: Marney Alena Mederos, RPR

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<p>1 Thursday, May 26, 2011</p> <p>2 11:36 a.m.</p> <p>3</p> <p>4</p> <p>5</p> <p>6 Videotaped Deposition of DOROTHY LOUISE WILLIAMS,</p> <p>7 held at the offices of:</p> <p>8</p> <p>9</p> <p>10</p> <p>11 Joseph, Greenwald & Laake, P.A.</p> <p>12 6404 Ivy Lane</p> <p>13 Suite 400</p> <p>14 Greenbelt, Maryland 20770</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Pursuant to notice, before Marney Alena</p> <p>21 Mederos, Registered Professional Reporter and</p> <p>22 Notary Public in and for the State of Maryland.</p>	<p>1 A P P E A R A N C E S (Continued)</p> <p>2 ALSO PRESENT:</p> <p>3 Patrick Ruffner, Videographer</p> <p>4 Gloria McClam-Magruder</p> <p>5 Clarence Jackson</p> <p>6 Denise Killen</p> <p>7 Clifford Boswell</p> <p>8 William Meadows</p> <p>9 Joel Peebles, Sr.</p> <p>10</p> <p>11</p> <p>12 * * *</p> <p>13</p> <p>14</p> <p>15 C O N T E N T S</p> <p>16 EXAMINATION OF DOROTHY LOUISE WILLIAMS PAGE</p> <p>17 By Mr. Maloney 7</p> <p>18 By Mr. Marks 130</p> <p>19</p> <p>20</p> <p>21 * * *</p> <p>22</p>
Page 3	Page 5
<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 On behalf of the Plaintiff/Counter-Defendant/</p> <p>4 Third-Party Defendants:</p> <p>5 ISAAC H. MARKS, SR., ESQUIRE</p> <p>6 O'Malley, Miles, Nylan & Gilmore, P.A.</p> <p>7 11785 Beltsville Drive</p> <p>8 10th Floor</p> <p>9 Calverton, Maryland 20705</p> <p>10 (301) 572-7900</p> <p>11</p> <p>12</p> <p>13 On behalf of the Defendants/Counter-Plaintiffs/</p> <p>14 Third-Party Plaintiffs:</p> <p>15 TIMOTHY F. MALONEY, ESQUIRE</p> <p>16 Joseph, Greenwald & Laake, P.A.</p> <p>17 6404 Ivy Lane</p> <p>18 Suite 400</p> <p>19 Greenbelt, Maryland 20770</p> <p>20 (301) 220-2200</p> <p>21</p> <p>22</p>	<p>1 E X H I B I T S</p> <p>2 EXHIBIT NO DESCRIPTION PAGE</p> <p>3 (NONE)</p> <p>4</p> <p>5 * * *</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

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1 PROCEEDINGS
 2 THE VIDEOGRAPHER: Here begins tape
 3 number 1 in today's deposition of Dorothy Williams in
 4 the matter of Jericho Baptist Church Ministries,
 5 Incorporated versus Joel R. Peebles, Sr., et al.,
 6 versus Gloria McClam-Magruder, et al., in the Circuit
 7 Court for Prince George's County, Maryland, Case
 8 Number CAL 1033647.
 9 Today's date is May 26th, 2011. The
 10 time is 11:36 a.m. The videographer is Patrick
 11 Ruffner. This deposition is taking place at 6404 Ivy
 12 Lane, Greenbelt, Maryland.
 13 Counsel please voice identify yourselves
 14 and state whom you represent.
 15 MR. MALONEY: Timothy Maloney for the
 16 Defendants.
 17 MR. MARKS: Isaac Marks for the
 18 Plaintiff.
 19 THE VIDEOGRAPHER: The court reporter is
 20 Marney Mederos of Merrill LAD.
 21 Would the reporter please swear in the
 22 witness?

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1 Whereupon,
 2 DOROTHY LOUISE WILLIAMS
 3 a Witness, called for examination by counsel for
 4 the Defendants/Counter-Plaintiffs/Third-Party
 5 Plaintiffs, having first been duly sworn, was
 6 examined and testified as follows:
 7 EXAMINATION BY COUNSEL FOR
 8 DEFENDANTS/COUNTER-PLAINTIFFS/THIRD-PARTY PLAINTIFFS
 9 BY MR. MALONEY:
 10 Q. Ms. Williams, good morning.
 11 A. Good morning.
 12 Q. Would you tell the reporter your full
 13 name and your address?
 14 A. My full name is Dorothy Louise Williams.
 15 My address is 14515 Turner Wootton Drive, Upper
 16 Marlboro, Maryland --
 17 Q. And do you own that house?
 18 A. -- ZIP code 20774.
 19 Q. Do you own that house?
 20 A. No, I do not.
 21 Q. Who owns the house?
 22 A. Yarnetta Peebles.

Page 8

1 Q. Are you a tenant in that house?
 2 A. Yes, I am.
 3 Q. Do you rent a certain part of the house?
 4 A. Yes, I do.
 5 Q. What do you rent?
 6 A. A room.
 7 Q. Is that in the basement?
 8 A. Yes, it is.
 9 Q. What is your date of birth?
 10 A. 4/20/1947.
 11 Q. Have you ever had your deposition taken
 12 before?
 13 A. Yes, I believe so. I'm not really sure.
 14 I was in a car accident, and I had some questions
 15 asked of me --
 16 Q. When and --
 17 A. -- but I didn't know if it was a
 18 deposition.
 19 Q. When and how long ago was that?
 20 A. Maybe 1999.
 21 Q. Other than the car accident, have you
 22 ever had your deposition taken --

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1 A. No.
 2 Q. -- before.
 3 Are you employed?
 4 A. Yes, I am.
 5 Q. Where are you employed?
 6 A. Jericho Baptist Church Ministries, Inc.
 7 Q. And what is your position with Jericho
 8 Baptist?
 9 A. Chief financial officer.
 10 Q. And how much are you paid in that
 11 position?
 12 A. 83,000.
 13 Q. How long have you earned \$83,000 in that
 14 position?
 15 A. Last year, May.
 16 Q. So you got a pay raise last year in May?
 17 A. Yes.
 18 Q. All right. And what was your previous
 19 salary?
 20 A. Sixty-three.
 21 Q. How did your salary happen to go from
 22 \$63,000 to \$83,000 in May of 2010?

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1 A. Apostle called me and told me that she
 2 was giving me a pay raise.
 3 **Q. Uh-huh.**
 4 **And that's what happened?**
 5 A. Yes.
 6 **Q. Was there ever a board of directors or**
 7 **trustees meeting to approve the pay raise?**
 8 A. No, there wasn't.
 9 **Q. So she just did that on her own; is that**
 10 **correct?**
 11 A. That's correct.
 12 **Q. And was some paperwork signed by anyone?**
 13 A. She did send a memo --
 14 **Q. Uh-huh.**
 15 A. -- but I don't know if it was signed,
 16 but I know she sent a memo.
 17 **Q. Who prepared the memo?**
 18 A. I don't know.
 19 **Q. I'd like you to tell me a little bit**
 20 **about your educational background.**
 21 A. Okay. I went to school in North
 22 Carolina --

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1 **Q. Uh-huh.**
 2 A. -- started.
 3 **Q. Uh-huh.**
 4 A. I finished high school up here at
 5 Spingarn STAY.
 6 **Q. Uh-huh.**
 7 A. I went to college --
 8 **Q. Uh-huh.**
 9 A. -- for two years, dropped out.
 10 **Q. What year --**
 11 A. Over a period of years, I went back.
 12 **Q. Uh-huh.**
 13 A. And I went through like -- I didn't
 14 get -- I didn't get my A.A. I stopped before that.
 15 **Q. Okay.**
 16 A. Okay.
 17 **Q. What year did you graduate from**
 18 **Spingarn?**
 19 A. 1982.
 20 **Q. And what college did you go to?**
 21 A. UDC.
 22 **Q. And did you take any -- have any special**

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1 **concentration or courses you --**
 2 A. Accounting.
 3 **Q. Were you aspiring towards an associate's**
 4 **degree in accounting?**
 5 A. I really was.
 6 **Q. Uh-huh.**
 7 **And how far did you get? How many**
 8 **credits did you earn?**
 9 A. Oh, Lord. I don't know. I really don't
 10 know.
 11 **Q. After graduating from Spingarn in '82,**
 12 **where did you go to work?**
 13 A. I worked at Woodward & Lothrop.
 14 **Q. At Woodies, the old Woodies?**
 15 A. Yes.
 16 **Q. And what did you do for Woodies?**
 17 A. Cook.
 18 **Q. Uh-huh.**
 19 **Which office?**
 20 A. Downtown, F Street.
 21 **Q. Where, at 12th and F?**
 22 A. No.

Page 13

1 **Q. 10th and F?**
 2 A. (Witness shrugs shoulders.)
 3 **Q. And how long did you work for Woodies?**
 4 A. Four years. Well, I worked longer,
 5 because when I went to work in the government, I still
 6 worked there part-time.
 7 **Q. Okay.**
 8 A. So I left full-time in '86 and went in
 9 the government.
 10 **Q. And where in the government did you**
 11 **work?**
 12 A. I first started at Bureau of Engraving.
 13 **Q. Uh-huh.**
 14 **The Bureau of Printing & Engraving?**
 15 A. No, no, no. I'm sorry. Is Bureau of
 16 Engraving where they make the money?
 17 **Q. Right.**
 18 A. Treasury?
 19 **Q. The Mint.**
 20 A. Yes --
 21 **Q. Okay.**
 22 A. -- that's where I worked.

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1 **Q. And what did you do for them?**
 2 A. Recording clerk.
 3 **Q. Uh-huh.**
 4 **And how long did you hold that job?**
 5 A. For about nine months. Then I was
 6 upgraded.
 7 **Q. To what?**
 8 A. To -- I started as a 3, and I was
 9 upgraded to a 4.
 10 **Q. A GS-4?**
 11 A. A GS-4, yes.
 12 **Q. And what was the GS-4 job you had?**
 13 A. The G -- the -- the GS-4 job was doing
 14 coupons.
 15 **Q. Uh-huh.**
 16 A. What we had to do was count the Treasury
 17 notes when they come in.
 18 **Q. Uh-huh.**
 19 A. We had to count the coupons that was
 20 attached to the Treasury note as they came off.
 21 **Q. Okay. How long did you hold the GS-4**
 22 **job?**

Page 15

1 A. GS-4 job? I don't -- I don't remember,
 2 because I went from one place to the next in the same
 3 department, so I -- I really --
 4 **Q. How long did you stay at the Mint?**
 5 A. I left the Mint in 1988.
 6 **Q. What was the job you had when you left**
 7 **the Mint?**
 8 A. I don't remember.
 9 **Q. Why did you leave the Mint?**
 10 A. I got another promotion.
 11 **Q. And where did you go?**
 12 A. I went to -- I can't remember that. It
 13 was still in the government, though.
 14 **Q. Uh-huh.**
 15 A. Down at -- anyway, I went downtown.
 16 **Q. Uh-huh.**
 17 A. It was a job downtown, and I'm trying to
 18 think of what I was doing.
 19 **Q. How long did you hold that job?**
 20 A. I held that job about a year --
 21 **Q. Uh-huh.**
 22 A. -- in the same department. I went to

Page 16

1 another job in a different location.
 2 **Q. Uh-huh.**
 3 A. I don't remember all those jobs.
 4 **Q. How long did you continue to work for**
 5 **the government?**
 6 A. I worked for the government for
 7 22 years.
 8 **Q. Uh-huh.**
 9 **And when did you retire from the**
 10 **government?**
 11 A. I didn't retire. I resigned.
 12 **Q. You resigned.**
 13 **And when did you resign?**
 14 A. 1994.
 15 **Q. Uh-huh.**
 16 **And what was the job you held when you**
 17 **resigned from the government?**
 18 A. When I resigned from the government, I
 19 was budget assistant.
 20 **Q. In what department?**
 21 A. With television. I was working under
 22 D -- communications department, I guess you could say.

Page 17

1 **Q. Of which agency?**
 2 A. U.S. Information Agency.
 3 **Q. USIA?**
 4 A. Yes.
 5 **Q. Why did you resign from USIA?**
 6 A. I just left.
 7 **Q. Did you have another job?**
 8 A. No.
 9 **Q. Did you just -- what did you do for a**
 10 **living after that?**
 11 A. Well, they really had a buyout.
 12 **Q. Uh-huh.**
 13 A. So I took the buyout --
 14 **Q. Okay.**
 15 A. -- and just left.
 16 **Q. Okay. Were you asked to resign?**
 17 A. No.
 18 **Q. And what did you do after leaving USIA?**
 19 A. I just went home and sit for a while.
 20 In the meantime, I was working at the church.
 21 **Q. When did you start working at the**
 22 **church?**

Page 18

1 A. 1987.
 2 **Q. When did you first come to Jericho?**
 3 A. 1986.
 4 **Q. How did you happen to come to Jericho?**
 5 A. My spiritual mom --
 6 **Q. Uh-huh.**
 7 A. -- told me about this lady that she saw
 8 on TV --
 9 **Q. Uh-huh.**
 10 A. -- and she really liked the way she
 11 broke the word down, and I had been asking God for a
 12 church that taught the unadulterated word of God.
 13 **Q. Uh-huh.**
 14 A. And when I went there and I heard her
 15 speak --
 16 **Q. Uh-huh.**
 17 A. -- and I said, "God, thank you. You're
 18 so merciful. You sent me to a place that does just
 19 what I ask you."
 20 **Q. You're referring to Betty Peebles?**
 21 A. Yes.
 22 **Q. Who was your spiritual mom?**

Page 19

1 A. Gladys Gravatt --
 2 **Q. Uh-huh.**
 3 A. -- and she's passed.
 4 **Q. Uh-huh.**
 5 A. She's dead.
 6 **Q. And did there come a time when you**
 7 **became active in the church in a volunteer capacity?**
 8 A. Yes, I did.
 9 **Q. Tell me what you did.**
 10 A. In 1987.
 11 **Q. Uh-huh.**
 12 **What happened?**
 13 A. I worked with the pastor in doing her
 14 messages.
 15 **Q. Uh-huh.**
 16 **And what did that work entail?**
 17 A. Just working with her in doing the
 18 messages, like going through them sometimes when she
 19 finished them.
 20 **Q. Uh-huh.**
 21 A. At her house, helping to look up
 22 scriptures --

Page 20

1 **Q. Uh-huh.**
 2 A. -- and, you know, so forth and so on.
 3 It's -- it's -- it didn't entail a lot.
 4 **Q. And when --**
 5 A. I was still working eight hours a day.
 6 **Q. When did you first go on the Jericho**
 7 **payroll?**
 8 A. Oh, I went on Jericho payroll after I
 9 left the government. She gave me like \$200 every two
 10 weeks.
 11 **Q. Uh-huh.**
 12 A. And at some point, she upped it to 400 a
 13 month.
 14 **Q. Uh-huh.**
 15 **That's pretty much the same thing, isn't**
 16 **it?**
 17 A. No, because \$200 every two weeks is more
 18 than \$400 a month.
 19 **Q. Well, the -- what was your -- what were**
 20 **you getting for the \$400 a month? What were you doing**
 21 **for that money?**
 22 A. Working with the tithing offering

Page 21

1 envelopes --
 2 **Q. Uh-huh.**
 3 A. -- and doing some accounting work at the
 4 church.
 5 **Q. When you say accounting work, what were**
 6 **you doing?**
 7 A. Um, counting the money --
 8 **Q. Uh-huh.**
 9 A. -- and working with the envelopes,
 10 putting them in the computer for people's tithing
 11 offering to give them a statement at the end of the
 12 year.
 13 **Q. Okay. Did there come a time when your**
 14 **duties changed or your salary changed?**
 15 A. Yes, when she brought me on full-time.
 16 **Q. And when was that?**
 17 A. I want to say 1989.
 18 **Q. Uh-huh.**
 19 **And what was your full-time job that you**
 20 **got in 1989?**
 21 A. Twenty thou- --
 22 **Q. Twenty --**

Page 22

1 A. Are you talking about the money? 20 a
 2 year. Yeah, 20,000 a year.
 3 **Q. And what did you do for the 20 a year?**
 4 A. I -- I started taking on all of the
 5 books of the church, all of the finances of the
 6 church, the invoices, the payments, and everything.
 7 **Q. Uh-huh.**
 8 **Had you had any particular background or**
 9 **training for that kind of work?**
 10 A. In the government I did, yes.
 11 **Q. Which government agency gave you**
 12 **training for that?**
 13 A. USIA.
 14 **Q. And did you continue to hold that**
 15 **position since 1989?**
 16 A. No.
 17 **Q. Well, did there come a time when your**
 18 **duties changed after 1989, you either got more money**
 19 **or more responsibility?**
 20 A. All of the above.
 21 **Q. And when did that happen?**
 22 A. Okay. I'm thinking, because I want

Page 23

1 to --
 2 **Q. Take -- you take your time.**
 3 A. I want to say 1990 --
 4 **Q. Uh-huh.**
 5 A. -- is really when I started at the
 6 church full-full-time.
 7 **Q. And what did you do then?**
 8 A. That's when I took on all of the
 9 responsibility of the finances --
 10 **Q. Uh-huh.**
 11 A. -- payroll, all.
 12 **Q. Uh-huh.**
 13 **How much did you get paid for that then?**
 14 A. I don't remember if she raised me right
 15 away when -- when I started doing that.
 16 **Q. Uh-huh.**
 17 A. After I took on all the finances --
 18 **Q. Uh-huh.**
 19 A. -- I can't remember if she raised me
 20 right away or not.
 21 **Q. Uh-huh.**
 22 A. But when she did give me a raise, she

Page 24

1 raised me up to 30-some -- 37,000, like that,
 2 somewhere around 37.
 3 **Q. When did that happen?**
 4 A. Um, I don't know. I don't remember.
 5 **Q. When did you become chief financial**
 6 **officer?**
 7 A. Just since the board been in place.
 8 **Q. This new board?**
 9 A. Yes.
 10 **Q. What was your job before that?**
 11 A. Director of finance.
 12 **Q. How much did you make as director of**
 13 **finance?**
 14 A. 83,000.
 15 **Q. For how long a period did you make**
 16 **83,000? When did you get to that salary?**
 17 A. From May 16th last year to present.
 18 **Q. Uh-huh.**
 19 **What were you making at the time of the**
 20 **apostle's death?**
 21 A. 83,000.
 22 **Q. What was your salary before it was**

Page 25

1 **83,000?**
 2 A. 63,000.
 3 **Q. And when did you go from 63 to 83?**
 4 A. May 16, 19 -- 2010.
 5 **Q. And how is it that you can remember that**
 6 **date so clearly?**
 7 A. Because it just happened.
 8 **Q. Okay. And when did you get the salary**
 9 **of 63? When did that happen?**
 10 A. Well, the 63 didn't come as salary just
 11 like that.
 12 **Q. Uh-huh.**
 13 A. Every year, we got a raise of 3 percent.
 14 And from wherever my salary was, it helped raised me
 15 up.
 16 **Q. Uh-huh.**
 17 **Was it generally the apostle's practice**
 18 **to raise everybody each year by 3 percent?**
 19 A. Yes, it was.
 20 **Q. Uh-huh.**
 21 **Why did you suddenly go from 63 to 83?**
 22 **What did you do to deserve that?**

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1 A. The pastor gave it to me.
 2 **Q. Uh-huh.**
 3 **But you don't know why?**
 4 A. No, I don't.
 5 **Q. Did Ms. Killen have a role in you**
 6 **getting that increase?**
 7 A. I don't know. I can't answer that.
 8 **Q. Uh-huh.**
 9 A. But I can answer this: The pastor was
 10 giving me a raise anyway, so, you know --
 11 **Q. Was she giving you a \$20,000 raise?**
 12 A. I can't say how much it was.
 13 **Q. Now, you've been present during these**
 14 **depositions when people have been asking about the**
 15 **financial reports, correct?**
 16 A. Yes, I have.
 17 **Q. What's going on with these financial**
 18 **reports?**
 19 A. In what aspect?
 20 **Q. Well --**
 21 A. I mean, I've always worked the finances
 22 according to the way the apostle operated. And right

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1 now, we're working on doing finances every month.
 2 **Q. Uh-huh.**
 3 A. When the apostle was here, I didn't have
 4 to give finance reports. I would tell her what the
 5 offering was on Sunday. That was it until the
 6 quarterlies were done.
 7 **Q. So, in other words, you never had**
 8 **regular financial reports except when the apostle was**
 9 **here; is that correct?**
 10 A. That's correct.
 11 **Q. Uh-huh.**
 12 **And the apostle told you not to have**
 13 **financial reports?**
 14 A. The apostle wouldn't allow me to do
 15 reports to issue out. For what reason, it was hers.
 16 I don't know.
 17 **Q. Well, did you ever give her reports that**
 18 **she could have on her own?**
 19 A. Only when she requested it.
 20 **Q. And how often would that be?**
 21 A. I don't -- I can't -- I don't know,
 22 because she didn't request them often.

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1 **Q. Okay. And so how would anybody know how**
 2 **the church was performing financially?**
 3 A. She was satisfied.
 4 **Q. Well, I understand that you believe she**
 5 **was satisfied.**
 6 **But my question is, how was the**
 7 **financial performance of Jericho accounted for and**
 8 **measured?**
 9 A. I cannot answer that question.
 10 **Q. Have there been any -- has there been,**
 11 **up until now, any kind of reasonable financial**
 12 **reporting system in place at Jericho?**
 13 A. No, it hasn't.
 14 **Q. Uh-huh.**
 15 A. When I first came, I worked out a budget
 16 and I gave it to her.
 17 **Q. Uh-huh.**
 18 A. And from that point, no more finances.
 19 **Q. So how long ago was it that you gave her**
 20 **a budget?**
 21 A. When -- when we first moved over here.
 22 **Q. What year was that?**

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1 A. 1998.
 2 **Q. Did she do anything with the budget?**
 3 A. Not that I know of.
 4 **Q. Okay. And since '98, have you ever**
 5 **prepared a budget?**
 6 A. No.
 7 **Q. And since 1998, to your knowledge, has**
 8 **there ever been a budget?**
 9 A. No.
 10 **Q. And did she ever ask you for monthly**
 11 **financial statements?**
 12 A. No.
 13 **Q. And since 1998, have there ever been**
 14 **monthly financial statements?**
 15 A. No.
 16 **Q. Did she ever ask you for annual**
 17 **financial statements?**
 18 A. Yes.
 19 **Q. And have there ever been annual**
 20 **financial statements?**
 21 A. Yes.
 22 **Q. When did the annual financial statements**

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1 **start?**
2 A. When we moved over here and started
3 doing quarterlies --
4 **Q. In 1998?**
5 A. -- and then we had to do an audit.
6 **Q. Uh-huh.**
7 **Have there ever been audits?**
8 A. Yes.
9 **Q. All right. And when was the last time**
10 **the books and records -- when is the last time that a**
11 **complete audit of the books and records of Jericho has**
12 **occurred?**
13 A. June of 2010, and that was for 19 -- for
14 2009.
15 **Q. Uh-huh.**
16 A. Okay.
17 **Q. And that audit has been completed?**
18 A. Yes, it has.
19 **Q. And who prepared that audit?**
20 A. Our accountant.
21 **Q. And who is that?**
22 A. Scaffold F. Ford [sic].

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1 **Q. And who do you deal with at that firm?**
2 A. Scaffold F. Ford [sic].
3 **Q. Okay. And with respect to the**
4 **quarterlies, has it been your practice since you came**
5 **to work at Jericho to prepare quarterlies?**
6 A. No.
7 **Q. Uh-huh.**
8 A. We only started quarterlies when we
9 moved over here in 19 -- yeah, 1998.
10 **Q. So you've been preparing quarterlies in**
11 **1998?**
12 A. Since then, yes.
13 **Q. And how soon after the quarter is**
14 **completed are the quarterlies -- have the quarterlies**
15 **been prepared?**
16 A. It was -- the quarterlies were completed
17 around June --
18 **Q. Uh-huh.**
19 A. -- of the -- the middle of the year.
20 **Q. For which quarters?**
21 A. The quarter of the year before.
22 **Q. So the final quarter of the year before?**

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1 A. No. Okay. You said quarterly, okay?
2 The quarters are repeated 45 days after the quarter is
3 over.
4 **Q. Okay. That's what I'm asking.**
5 A. Okay. 45 days after the quarter is
6 over.
7 **Q. Okay. And has that been true since '98?**
8 A. No, because at some point they were
9 late.
10 **Q. When did they start becoming late?**
11 A. When the workload became heavy and there
12 was nobody to do the work but me.
13 **Q. Uh-huh.**
14 A. So the workload became too heavy; I
15 couldn't keep up with all of it.
16 **Q. And when did that happen, what year?**
17 A. It started in, I want to say, 2000. And
18 once it got behind, it always stayed behind because it
19 was a little late getting done.
20 **Q. Okay. And let's say for 2009 -- have**
21 **the quarters been completed for 2009?**
22 A. Yes, all of the quarters are completed

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1 for 2009.
2 **Q. And how about for 2010?**
3 A. All of the quarters for 2010 are
4 completed.
5 **Q. Including the final quarter that ends on**
6 **December the 31st of 2010?**
7 A. That quarter is completed too.
8 **Q. When was that completed?**
9 A. Last week.
10 **Q. Last week?**
11 A. Yeah.
12 **Q. And what did that quarter show for the**
13 **final-quarter performance for 2010?**
14 A. I don't recall.
15 **Q. When you completed that quarter, did you**
16 **distribute it to the members of the board of**
17 **directors?**
18 A. I have not yet, no.
19 **Q. And how come you haven't?**
20 A. We haven't had a meeting.
21 **Q. Uh-huh.**
22 **Have you distributed the third-quarter**

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1 performance reports for the third quarter of 2010 to
 2 the board?
 3 A. Yes, I have.
 4 Q. And how about the first quarter of 2011
 5 from January the 1st of 2011 to March 31st of 2011?
 6 Has that been completed?
 7 A. No, it has not.
 8 Q. And what's the status on that?
 9 A. Right now we're working on the audit.
 10 Q. Uh-huh.
 11 A. So when the audit is completed --
 12 Q. Uh-huh.
 13 A. -- then I'll go to the first quarter.
 14 Q. Now, is this a problem -- this delay in
 15 getting these reports done, is this a problem with
 16 your software, or your workload, or what is it?
 17 A. The workload.
 18 Q. There's no problem with the software?
 19 A. Not -- no more than updating.
 20 Q. Uh-huh.
 21 A. My software has been updated.
 22 Q. What software do you use?

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1 A. QuickBooks.
 2 Q. Have you asked the board for any
 3 assistance so that you can get these reports out on a
 4 timely basis?
 5 A. No, I haven't.
 6 Q. How come?
 7 A. Well, I was always told that in the
 8 finance office I couldn't just take anybody and put
 9 them in there --
 10 Q. Uh-huh.
 11 A. -- okay? That was the apostle's
 12 demeanor. She didn't want anybody working in the
 13 finances office.
 14 Q. So you're doing this all yourself?
 15 A. Yes.
 16 Q. Do you have any assistants?
 17 A. Yes, I do.
 18 Q. Who assists you?
 19 A. I have -- a young lady work for me with
 20 payroll, and I have two people working with me with
 21 the envelopes to be put into the system, but the main
 22 accounting work and reports come through me with me

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1 putting the stuff in.
 2 Q. And who are the two people that assist
 3 you in the envelopes?
 4 A. Anne Wesley and Jennie Jackson.
 5 Q. And who does payroll with you?
 6 A. Marry Huntley.
 7 Q. Have you made a decision now to try to
 8 prepare monthly reports?
 9 A. Yes, we have.
 10 Q. And when was --
 11 A. I have talked about that.
 12 Q. When was that decision made?
 13 A. Oh, when we first -- through a meeting
 14 with the board, like in October, November.
 15 Q. Uh-huh. Uh-huh.
 16 And the board decided to do monthlies;
 17 is that correct?
 18 A. Well, the board wanted weekly. I
 19 refused to do weekly. It's too much work for me to do
 20 weekly reports to distribute just for that.
 21 Q. Uh-huh.
 22 How about a weekly collection report?

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1 Can you do that?
 2 A. I can do the weekly collection report.
 3 Q. Do you prepare such a report now?
 4 A. No.
 5 Q. How come?
 6 A. I mean, I have a tally sheet that I do
 7 for when we count the money.
 8 Q. Uh-huh.
 9 A. That's what I have. I don't prepare
 10 weekly reports, no.
 11 Q. Do you give that to anybody or just keep
 12 it to yourself?
 13 A. I put it in the machine and log it into
 14 the computer and put it in my notebook.
 15 Q. But how about to any human beings, such
 16 as a member of the board or the board as a whole?
 17 A. I've never had the practice of doing
 18 that when the apostle was there --
 19 Q. Uh-huh.
 20 A. -- so I never did it.
 21 Q. And you still don't do it?
 22 A. And I still haven't done it.

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1 **Q. All right. And with respect to the --**
 2 **is there an annual that you've now completed or do?**
 3 **For instance, for 2010, have you done an annual**
 4 **report?**
 5 A. Could you repeat the question, please,
 6 because I don't -- I don't --
 7 **Q. Sure.**
 8 **Have you done an annual report for 2010?**
 9 A. For the -- for the audit --
 10 **Q. So the --**
 11 A. -- and the quarterly, yes.
 12 **Q. So the auditor -- the auditors are doing**
 13 **that for you; is that what you're saying?**
 14 A. When they do the audit, yes. I haven't
 15 done one.
 16 **Q. Have you ever assisted or been involved**
 17 **in the preparation of the 990-T tax return?**
 18 A. No, I haven't.
 19 **Q. Are you aware of any 990-T tax returns**
 20 **being filed?**
 21 A. Yes, I am.
 22 **Q. Tell me what you know about the 990-T's.**

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1 A. The 990-T's are done on the warehouses.
 2 No taxes are done on the church.
 3 **Q. All right. So the church does not file**
 4 **990-T's?**
 5 A. The church does not file 990's. They're
 6 done on the warehouse.
 7 **Q. Does the -- does the warehouse file a**
 8 **990-T?**
 9 A. Yes, it does.
 10 **Q. And does it file a UBIT, Unrelated**
 11 **Business Income Tax, return? Have you ever heard of**
 12 **that?**
 13 A. No. If you -- maybe if you break it
 14 down.
 15 **Q. All right. Well, let's talk about the**
 16 **warehouse. Who prepares the 990-T's for the**
 17 **warehouse?**
 18 A. Scaffold Ford [sic].
 19 **Q. Uh-huh.**
 20 **And when was the last time they prepared**
 21 **a 990-T for the warehouse?**
 22 A. What's this? 2010.

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1 **Q. And how about the personal property tax**
 2 **returns for the church? Have you been involved in the**
 3 **preparation of a personal property tax return for the**
 4 **church?**
 5 A. Somewhat. I wasn't the one that
 6 completed it, though.
 7 **Q. Who completes it?**
 8 A. Denise Killen.
 9 **Q. And when was the last time a personal**
 10 **property tax return was filed for the church?**
 11 A. Last -- it was this month.
 12 **Q. And --**
 13 A. It was this month.
 14 **Q. What is the status of the collections**
 15 **based on your weekly tally? For instance, do you**
 16 **break that down by the 8:00 service and the**
 17 **11:00 service?**
 18 A. Yes, I do. I break it down by the 8:00
 19 and the 11:00. But at the end of the day, I combine
 20 it all.
 21 **Q. Okay. So you can tell how much is**
 22 **coming from each and then you can tell a total; is**

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1 **that correct?**
 2 A. Not on paper.
 3 **Q. Well -- but you have a way prior to**
 4 **putting it on paper you can tell?**
 5 A. No.
 6 **Q. All right. So all you can do is lump it**
 7 **together?**
 8 A. Yes, I do.
 9 **Q. Is there any reason there's not a**
 10 **separate accounting for each service?**
 11 A. No, there's not a reason, but that's the
 12 way it's always been done.
 13 **Q. And what is the tally showing now during**
 14 **the current period for the total Sunday collections?**
 15 A. I can't remember those numbers from one
 16 week to the next like that.
 17 **Q. So as the chief financial officer of the**
 18 **corporation, you have no idea what the approximate**
 19 **Sunday collections are; is that correct?**
 20 A. Well, if I -- I can -- I really haven't
 21 done an average, but each Sunday it falls. So to tell
 22 you approximately, I just couldn't do it.

Page 42	Page 44
<p>1 Q. So you can't even give us an estimate? 2 As the chief financial officer, you're not in a 3 position to even give us an estimate? 4 A. I can give you an estimate if I use 5 Sunday's offering -- 6 Q. Go ahead. 7 A. -- which was like 48,000. 8 Q. This past Sunday? 9 A. This past Sunday. 10 Q. Okay. And how did that compare to, say, 11 Sunday a month ago? 12 A. Sunday a month ago? I can't go back to 13 that number that long ago. I don't know. 14 Q. All right. Well, is the collection -- 15 is it your testimony that the collection has been 16 consistently falling? 17 A. Yes. 18 Q. Uh-huh. 19 And is that week after week? 20 A. Week after week, yes. 21 Q. All right. And do you as the chief 22 financial officer and also as a member of the board</p>	<p>1 their tithe in on Wednesday night and they haven't 2 been cashed yet. So I just told them I couldn't, you 3 know, explain that because I don't get the money from 4 Wednesday nights. 5 Q. Has anybody complained to you about a 6 Sunday check that has not been cashed? 7 A. No. 8 Q. How many people have complained to you 9 about Wednesday checks not being cashed? 10 A. Two. 11 Q. Okay. And who were those people? 12 A. They -- I -- I don't know. 13 Q. You can't remember their names? 14 A. I can't remember their name. 15 Q. Okay. And with respect to the quarterly 16 financial performance for the last quarter of 2010, 17 how did the church perform? This is the report you 18 just finished last week. 19 A. Could you repeat your question again, 20 please? 21 Q. Sure. 22 For the quarterly -- quarter ending</p>
<p>Page 43</p> <p>1 have an opinion as to why the collection is 2 consistently falling? 3 A. I would rather not say my opinion. 4 Q. Well, this is not a rather-not-say 5 business here, okay? 6 MR. MARKS: Let me object. The question 7 calls for speculation. 8 You may answer if you know, though. 9 BY MR. MALONEY: 10 Q. Go ahead. 11 A. I don't know. 12 Q. Well, I'm not asking you to speculate, 13 okay? I'm asking you what your view is as to why the 14 collection is consistently declining. 15 A. Well, recently I can say we have tables 16 all around the church collecting money, and that takes 17 away from people giving, and, you know, that -- that's 18 really my opinion. 19 And people are -- are giving and they're 20 saying that their checks has not been cashed, because 21 they come to me on them, and they -- some -- a couple 22 people came to me a couple weeks ago and said they put</p>	<p>Page 45</p> <p>1 December 31st, 2010 -- this is the report you say you 2 just finished last week -- how was the church's 3 financial performance? 4 A. I didn't finish the report. The 5 accountant did. 6 Q. Uh-huh. 7 A. And I have not analyzed the report as 8 far as to see how the church did for the year as for 9 financial-wise. 10 Q. So, in other words, you didn't prepare 11 the quarterly? The accountant did? 12 A. Yes. He does all of them. 13 Q. So you don't prepare any of the 14 quarterlies yourself? 15 A. No, I don't. 16 Q. Well, is the delay in getting these 17 quarterlies done, is that on the accountant's side or 18 on your side? 19 A. Some of it is my side when I give it to 20 him. 21 Q. In other words, you're late in getting 22 the entries posted?</p>

12 (Pages 42 to 45)

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1 A. Yes, sir.

2 **Q. What is the backlog? Is it posting to a**

3 **general ledger, or what is it?**

4 A. Yes, posting to the general ledger.

5 **Q. Do you actually have a general ledger**

6 **that you use?**

7 A. Yes, I do.

8 **Q. All right. And is it just -- and how**

9 **far -- where are you now in terms of the postings?**

10 **What month are you in?**

11 A. I'm working with April.

12 **Q. All right. So you're working in posting**

13 **the April financial performance now?**

14 A. Yes, I am.

15 **Q. What has happened to the salary levels**

16 **of the church, the total payroll, since the apostle's**

17 **death? Has it gone up, gone down, or stayed the same?**

18 A. Stayed the same.

19 **Q. All right. How is it that it's stayed**

20 **the same when we've had at least two significant pay**

21 **raises we've heard about?**

22 A. Not since the pastor's death we haven't

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1 had two pay raises.

2 **Q. All right. How about since 2009? Has**

3 **the payroll gone up, down, or stayed the same?**

4 A. Up.

5 **Q. How much has it increased?**

6 A. 2009? The payroll has gone down.

7 **Q. I'm sorry, I didn't --**

8 A. The payroll -- the payroll has gone down

9 since 2009.

10 **Q. And how has it gone down?**

11 A. Because of the teachers that were let go

12 at the academy.

13 **Q. You mean because of the grades 7 through**

14 **12 that were let go?**

15 A. Yes.

16 **Q. How about for the church itself? Has**

17 **the -- taking aside the academy, has the payroll gone**

18 **up, down, or stayed the same since 2009?**

19 A. Down.

20 **Q. And what is the status of the church**

21 **itself? Is it making a profit? In other words, does**

22 **it have a revenue that exceeds expenditures, or is**

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1 **there a deficit, or is it just breaking even?**

2 A. It exceeds itself.

3 **Q. It --**

4 A. It has income that exceeds itself.

5 **Q. And by how much on a monthly or**

6 **quarterly basis, if you know?**

7 A. I don't know.

8 **Q. Do you have any idea as the chief**

9 **financial officer what the margins are here?**

10 A. No, I don't --

11 **Q. Uh-huh.**

12 A. -- simply because I didn't do a report

13 to find out.

14 **Q. Uh-huh.**

15 **Are you a member of the board of**

16 **trustees?**

17 A. Yes, I am.

18 **Q. And when did you become a member of the**

19 **board of trustees?**

20 A. Well, I always was on the board until I

21 signed myself off in May of 2009.

22 **Q. Uh-huh.**

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1 A. And from what I can understand, that was

2 a mistake --

3 **Q. Uh-huh.**

4 A. -- so I had to go back.

5 **Q. Uh-huh.**

6 A. So we -- I -- they put me back on in the

7 end of November or the first of December.

8 **Q. Of what year?**

9 A. Of 2010 --

10 **Q. Uh-huh.**

11 A. -- yeah.

12 **Q. After the apostle's death?**

13 A. After the apostle's death, yes.

14 **Q. All right. When you say you were always**

15 **on the board of trustees, what do you remember about**

16 **when you first became a member of the board of**

17 **trustees?**

18 A. Well, really, I don't remember when I

19 first became a member of the board of trustees,

20 because I found out I was on the board of -- on the

21 board of trustees a long time after that, and there

22 was a document that came from D.C. --

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1 **Q. Uh-huh.**
2 A. -- from the District of Columbia that
3 had my name on it.
4 **Q. Uh-huh.**
5 A. That was when I found out.
6 **Q. When you first saw that document with**
7 **your name on it?**
8 A. Yes, and I don't know what date it was
9 or what year it was.
10 **Q. Prior to that time, were you aware of**
11 **being on the board of trustees?**
12 A. No, I wasn't.
13 **Q. So you're not aware of how you first**
14 **came to become a member of the board; is that correct?**
15 A. No, I'm not.
16 **Q. Do you have any idea whether you were**
17 **elected to the board or not?**
18 A. No, I wasn't.
19 **Q. Do you have any idea how you were chosen**
20 **or whether there was a meeting or an election or**
21 **anything like that?**
22 A. No, I don't.

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1 **Q. All right. Do you believe that you were**
2 **on the board for a long period of time prior to you**
3 **becoming aware that you were a member?**
4 A. Well, the paper that I saw was dated
5 1996.
6 **Q. Uh-huh.**
7 **Did you think you were a member of the**
8 **board before that?**
9 A. I don't know.
10 **Q. How could you become a member of the**
11 **board without knowing about it? Just tell me how that**
12 **would work.**
13 A. The apostle probably just put me there.
14 I don't know.
15 **Q. All right. Did the apostle ever ask you**
16 **whether you wanted to serve on the board or agreed to**
17 **serve on the board?**
18 A. Not that I recall.
19 **Q. Okay. So, in other words, you were just**
20 **sort of put on the board; is that correct?**
21 A. That's correct.
22 **Q. I'm going to show you what is marked**

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1 **here as exhibit -- tab 7, if you would look in the**
2 **book. This is a filing of a Certificate of**
3 **Organizational Documents on December 13th of 1998 that**
4 **does not have your name on here.**
5 **Do you see that?**
6 A. Yes.
7 **Q. Do you know anything about this**
8 **document?**
9 A. No, I don't.
10 **Q. Do you know whether or not, in fact, you**
11 **were a member of the board of trustees in December of**
12 **1998?**
13 A. No, I don't.
14 **Q. So you don't have any idea one way or**
15 **another; is that correct?**
16 A. I don't.
17 **Q. I'm going to show you a document**
18 **dated -- look at tab 3, if you would. This shows the**
19 **trustees -- this is from 1996 Statement of Election to**
20 **Accept Jericho Baptist Church, and it lists you as a**
21 **member of the board of trustees.**
22 **Do you see that?**

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1 A. Yes, I do.
2 **Q. Is that the 1996 document you were**
3 **referring to earlier?**
4 A. I'm not sure, but I know I saw a
5 document dated 1996.
6 **Q. Uh-huh.**
7 A. I'm not sure if this is the document or
8 not.
9 **Q. Uh-huh.**
10 **Hold on just a minute.**
11 **So you're not sure one way or the other?**
12 A. No, I'm not.
13 **Q. What do you recall about the 1996**
14 **document that you saw?**
15 A. All I know is I saw one. I can't -- I
16 don't have a recollection of what, you know --
17 **Q. Uh-huh.**
18 **You don't have a recollection one way or**
19 **the other?**
20 A. No.
21 **Q. How many years after 1996 did you first**
22 **see the 1996 document that listed you as a trustee?**

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1 A. In 2000.
 2 **Q. So it was about four years later?**
 3 A. Yes.
 4 **Q. And what were the circumstances under**
 5 **which you saw the 1996 document four years later?**
 6 A. When she -- when she was purchasing the
 7 gravel lot.
 8 **Q. The which lot?**
 9 A. The gravel lot.
 10 **Q. And did she need -- and how is it that**
 11 **when that purchase occurred that you became aware of**
 12 **the '96 document?**
 13 A. It was in the paperwork that she showed
 14 me. You know, the paperwork that involved the
 15 selling -- the settlement papers.
 16 **Q. Right.**
 17 A. The selling of the -- of the settlement
 18 of the land --
 19 **Q. Uh-huh.**
 20 A. -- it was in that paperwork.
 21 **Q. And the apostle showed you that?**
 22 A. Yes.

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1 **Q. Did you discuss with her the fact that**
 2 **there was a document in the file that showed you as a**
 3 **member of the board of trustees going all the way back**
 4 **to 1996?**
 5 A. No, I did not.
 6 **Q. And how come you didn't raise it with**
 7 **the apostle?**
 8 A. I just didn't.
 9 **Q. Were you okay with being listed as a**
 10 **trustee if she wanted to do that?**
 11 A. Yes.
 12 **Q. Had she ever gotten your permission or**
 13 **ever said anything to you about the fact that you were**
 14 **listed as a trustee four years earlier?**
 15 A. Not that I can recall.
 16 **Q. After -- at any time from 1996 until**
 17 **2000, did you ever attend a meeting of the board of**
 18 **trustees?**
 19 A. No, I didn't.
 20 **Q. Were you ever aware of a meeting of the**
 21 **board of trustees ever meeting between 1996 and 2000?**
 22 A. I know there was some meetings --

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1 **Q. Uh-huh.**
 2 A. -- but I can say this: I remember
 3 Pastor called a couple of meetings, and she called two
 4 people, Anne -- William Meadows and Anne Wesley, and
 5 myself. I was already at work.
 6 She called them and asked them to come
 7 in, and she asked some questions, and one of them was
 8 how do we upgrade the college, how do we get the
 9 college back on staff --
 10 **Q. Uh-huh.**
 11 A. -- because the college had declined.
 12 **Q. Uh-huh.**
 13 A. And then another one she called in was
 14 in reference to her purchasing the Bentley.
 15 **Q. Her purchasing the what?**
 16 A. The Bentley.
 17 **Q. Okay.**
 18 A. Those were the only two that I know
 19 about.
 20 **Q. When was the Bentley meeting called?**
 21 A. I don't remember the dates.
 22 **Q. Was it -- was it around the time that**

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1 **she purchased a Bentley?**
 2 A. I don't remember.
 3 MR. MARKS: Let me object to that
 4 question. There's no foundation that the pastor
 5 purchased a Bentley.
 6 BY MR. MALONEY:
 7 **Q. Well, did she purchase a Bentley?**
 8 A. The Bentley -- through the church.
 9 **Q. Right. Did the church purchase a**
 10 **Bentley for her?**
 11 A. Yes.
 12 **Q. All right. And did -- what was the**
 13 **discussion about the Bentley, if you can recall?**
 14 A. I don't recall.
 15 **Q. All right. Was this a formal meeting of**
 16 **the board of trustees or just a group of you that**
 17 **happened to be there?**
 18 A. No, it wasn't a formal meeting, because
 19 I don't remember being there with nobody but Meadows,
 20 Anne, and myself.
 21 **Q. So these were not so much a meeting of**
 22 **the board but trusted confidants?**

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1 A. That's what I would say.

2 **Q. All right. And how about the second**

3 **meeting with respect to the college? Are you**

4 **referring to the academy?**

5 A. No.

6 **Q. What's the college?**

7 A. I'm referring to the Christian Training

8 Center College.

9 **Q. Oh, the Christian Training Center, okay.**

10 A. Uh-huh.

11 **Q. When was this meeting with the Christian**

12 **Training Center?**

13 A. I don't know.

14 **Q. Was that a meeting -- how soon before**

15 **her death was that meeting?**

16 A. Oh, that was -- that was back in --

17 quite a few years. That was before she got sick --

18 **Q. Uh-huh.**

19 A. -- the first time.

20 **Q. Uh-huh.**

21 **And with respect to the meeting of**

22 **the -- was that a meeting of the board of trustees or**

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1 **just a group of trusted confidants?**

2 A. Well, I would say a group of confidants.

3 **Q. And which members of the board of**

4 **trustees were not present at either of those meetings?**

5 A. I can't say. I don't -- I don't know.

6 **Q. Well, who were the other members of the**

7 **board of trustees that were in place at that time?**

8 A. I don't know.

9 **Q. Do you have any idea who the other board**

10 **members were?**

11 A. I really don't.

12 **Q. Can you say one way or another whether**

13 **Joel Peebles was or was not a member of the board of**

14 **trustees at that time? Is that something you have**

15 **personal knowledge about?**

16 A. I don't.

17 **Q. Okay. I'm going to direct your**

18 **attention to tab 8. This is a document that deals**

19 **with the Certificate of Organizational Documents in**

20 **support of a borrowing, and it is signed January 27th**

21 **of 2000.**

22 **Do you recognize Betty Peebles'**

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1 **signature at the top?**

2 A. Yes, I do.

3 **Q. All right. And do you also see the**

4 **signature of Joel Peebles and William Meadows?**

5 A. Yes, I do.

6 **Q. All right. And were they, in fact, the**

7 **trustees on January 27th of 2000?**

8 A. According to this paper.

9 **Q. Do you have any reason to doubt that the**

10 **trustees on January 27th of 2000 include Betty**

11 **Peebles, Joel Peebles, and William Meadows?**

12 A. No.

13 **Q. I see that your name is not listed as a**

14 **trustee here.**

15 **Do you know whether or not you were a**

16 **trustee in January of 2000?**

17 A. No, I don't.

18 **Q. I'm going to show you a document --**

19 **let's go to the next page, tab 9. I'm going to show**

20 **you a document that was filed with the District of**

21 **Columbia on September the 26th, 2000. And this lists**

22 **the trustees as Betty Peebles, Clarence Jackson, John**

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1 **Peebles, Joel Peebles, Anne Wesley, and yourself,**

2 **Dorothy Williams.**

3 **Do you see this?**

4 A. Yes, I do.

5 **Q. All right. Were you a trustee on**

6 **September the 26th, 2000?**

7 A. Yes.

8 **Q. Was Joel Peebles a trustee on that date**

9 **as well, as the form indicates?**

10 A. Yes.

11 **Q. Did the board of trustees, to your**

12 **knowledge -- or strike that.**

13 **Did you ever attend a meeting of the**

14 **board of trustees at any time from 1996 up until March**

15 **of 2009?**

16 A. No.

17 **Q. Were you aware of a meeting of the board**

18 **of trustees ever being called from 1996 up until March**

19 **of 2009?**

20 A. No.

21 **Q. Let me ask you now to take a look at**

22 **tab 10, Certificate of Corporate Resolutions, dated**

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1 **March 27th, 2001. And this lists -- if you look at**
 2 **the officers of the corporation who are there, it**
 3 **lists the officers as Betty Peebles, Joel Peebles,**
 4 **Dorothy Williams, and Anne Wesley on page 2, and it**
 5 **lists you as treasurer.**
 6 **Do you see that?**
 7 A. Yes.
 8 **Q. Is that your signature?**
 9 A. Yes, it is.
 10 **Q. Is that the signature of Joel Peebles**
 11 **under Vice President?**
 12 A. Yes.
 13 **Q. Is that the signature of Betty Peebles**
 14 **under President?**
 15 A. Yes.
 16 **Q. Is that the signature of Anne Wesley**
 17 **under Secretary?**
 18 A. Yes.
 19 **Q. And, in fact, was Joel Peebles vice**
 20 **president on January 27th -- or March 27th, rather, of**
 21 **2001?**
 22 A. According to this document.

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1 **Q. And were you treasurer on that date as**
 2 **well?**
 3 A. Yes.
 4 **Q. Do you have any reason to doubt that**
 5 **Joel Peebles was vice president on that date?**
 6 A. No.
 7 **Q. When did you become the treasurer?**
 8 A. I don't know.
 9 **Q. I'd ask you, do you know how you became**
 10 **treasurer? Was there an election or a meeting to**
 11 **choose you?**
 12 A. No.
 13 **Q. I'm going to ask you now to look at the**
 14 **second document on tab 10, and this is a Certificate**
 15 **of Organizational Documents, which is dated the 29th**
 16 **day of September 2002.**
 17 **Do you see your name there as a trustee,**
 18 **the second to the bottom?**
 19 A. Yes, I do.
 20 **Q. Is that your signature?**
 21 A. Yes, it is.
 22 **Q. Do you see the name of Assistant Pastor**

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1 **Joel Peebles, Sr. as trustee?**
 2 A. Yes, I do.
 3 **Q. Is that his signature?**
 4 A. Yes.
 5 **Q. Do you see the name of Apostle Betty**
 6 **Peebles there?**
 7 A. Yes.
 8 **Q. Is that her signature?**
 9 A. Yes.
 10 **Q. Were all of those individuals, along**
 11 **with John Peebles and Anne Wesley and William Meadows,**
 12 **members of the board of trustees as indicated on**
 13 **September the 29th, 2002?**
 14 A. According to this document.
 15 **Q. Do you have any reason to doubt that**
 16 **they were members of the board of trustees then?**
 17 A. Well, we never had meetings to vote them
 18 on.
 19 **Q. Well, was there ever a meeting to vote**
 20 **you on?**
 21 A. No.
 22 **Q. Were you ever -- do you believe you were**

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1 **a trustee or you were not a trustee?**
 2 A. I said according to this document.
 3 **Q. Well -- but I'm not asking you -- not**
 4 **just according to the document, but generally do you**
 5 **believe you were a trustee prior to 19 -- prior to**
 6 **2009 or not?**
 7 A. Yes, I do.
 8 **Q. And why do you believe you were a**
 9 **trustee?**
 10 A. Because the paper says it.
 11 **Q. The same papers that show Joel Peebles**
 12 **as a trustee; is that right?**
 13 A. That's right.
 14 **Q. Do you agree if you were a trustee,**
 15 **then, that so is Joel Peebles?**
 16 A. Yes.
 17 **Q. When did -- when and how did Joel**
 18 **Peebles stop being a trustee, if you know?**
 19 A. I don't know.
 20 **Q. You don't have any idea as to how he**
 21 **stopped being a trustee?**
 22 A. No, I don't.

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1 **Q. As far as you know, was Joel Peebles a**
 2 **trustee from December of 1998 at least up until March**
 3 **of 2009, as far as you know?**
 4 A. As far as I know, yes.
 5 **Q. Was there ever a time during that**
 6 **period, as far as you know, that Joel Peebles ever**
 7 **stopped being a trustee?**
 8 A. Could you repeat that?
 9 MR. MALONEY: Could you read that back,
 10 please?
 11 (Thereupon, the reporter read back the
 12 record as requested.)
 13 THE WITNESS: No.
 14 BY MR. MALONEY:
 15 **Q. Was Joel Peebles ever removed as a**
 16 **trustee, as far as you know?**
 17 A. At what time period?
 18 **Q. At any time.**
 19 A. Not to my recollection.
 20 **Q. Did Joel Peebles ever resign as a**
 21 **trustee, as far as you know?**
 22 A. Not to my recollection.

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1 **Q. I'm going to ask you to take a look at**
 2 **tab 11, if you would.**
 3 **If Joel Peebles was not removed or**
 4 **resigned as a trustee, how is it that he is no longer**
 5 **a member of the board of trustees? Do you have any**
 6 **explanation for that?**
 7 A. No, I don't.
 8 **Q. Okay. I'll ask you, if you would, to**
 9 **take a look at tab 11. This is the filing for the**
 10 **District of Columbia, September 26th, 2002. It lists**
 11 **Betty Peebles' name, Joel Peebles' name, Clarence**
 12 **Jackson, and Anne Wesley, and yourself.**
 13 **Do you see that?**
 14 A. Yes, I do.
 15 **Q. Is this an accurate filing?**
 16 MR. MARKS: Let me object.
 17 There's no foundation that the witness
 18 has any knowledge of this being filed.
 19 MR. MALONEY: Well, we have a date stamp
 20 "Filed" here -- right on here with the Department.
 21 BY MR. MALONEY:
 22 **Q. My question to you is a simple one. As**

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1 **far as you know, were both you and Joel Peebles**
 2 **members of the board of trustees on the date reflected**
 3 **on this document, September the 26th, 2002, as far as**
 4 **you know?**
 5 A. As far as I know, according to this
 6 document.
 7 **Q. Do you have any reason to doubt that**
 8 **either you or Joel Peebles were, in fact, members of**
 9 **the board of trustees on this date, September the**
 10 **26th, 2002?**
 11 A. Yes, I do, because I see Clarence
 12 Jackson's name on here.
 13 **Q. Well, we'll get to Mr. Jackson in a**
 14 **minute. I'm going to ask you about him next, but I'm**
 15 **asking you right now about Joel Peebles and yourself,**
 16 **Dorothy Williams.**
 17 **Were, in fact, both of you members of**
 18 **the board of trustees in September of 2002?**
 19 A. Yeah.
 20 **Q. Is that a yes?**
 21 A. Yes.
 22 **Q. And how about Mr. Jackson? Do you have**

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1 **any personal knowledge one way or the other as to**
 2 **whether he was a member of the board of trustees in**
 3 **September of 2002?**
 4 A. No, I don't.
 5 **Q. I'm going to next ask you to turn to**
 6 **tab 12, which is a Corporate Resolution to Borrow.**
 7 MR. MARKS: Tim, let me ask you, after
 8 your tab 12 questioning, can we take a break for
 9 lunch? It's almost 12:30.
 10 MR. MALONEY: Sure. I would like to
 11 take a shorter break today. Let's take one from 12:30
 12 to 1:00, okay?
 13 MR. MARKS: Let's say 1:15.
 14 MR. MALONEY: 1:15 would be fine.
 15 MR. MARKS: Okay.
 16 BY MR. MALONEY:
 17 **Q. September 29th --**
 18 MR. MALONEY: I would like to go through
 19 the rest of these documents, but I'll do that quickly.
 20 BY MR. MALONEY:
 21 **Q. September 29th, 2002, tab 12, this lists**
 22 **the members of the board of trustees as Betty Peebles,**

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1 **Joel Peebles, John Peebles, William Meadows, Dorothy**
 2 **Williams, and Anne Wesley.**
 3 **Were those the members of the board of**
 4 **trustees on September 29th, 2002?**
 5 A. Yes.
 6 **Q. Is that your signature there above your**
 7 **name?**
 8 A. Yes.
 9 **Q. Is that the signature of Betty Peebles?**
 10 A. Yes.
 11 **Q. Is that the signature of Joel Peebles?**
 12 A. Yes.
 13 **Q. Let's move on now to tab 14. This is**
 14 **the filing with the District of Columbia on April the**
 15 **26th, 2007.**
 16 **Do you see your name there as treasurer?**
 17 A. Yes, I do.
 18 **Q. Do you see Betty Peebles' name as**
 19 **president?**
 20 A. Yes, I do.
 21 **Q. Do you see Joel Peebles, Sr.'s name as**
 22 **vice president?**

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1 A. Yes.
 2 **Q. Were all of the individuals that are**
 3 **listed there directors, as far as you know, including**
 4 **Joel Peebles, Betty Peebles, and yourself, on that**
 5 **date, April the 26th, 2007?**
 6 A. Yes.
 7 **Q. I'm going to now ask you to look at**
 8 **tab 17. This is Unanimous Consent of Directors in**
 9 **Lieu of a Meeting to authorize 4 million in debt**
 10 **relating to the Center of Hope. This is on**
 11 **October 31st, 2007.**
 12 **Is that your signature above your name,**
 13 **Dorothy Williams?**
 14 A. Yes, it is.
 15 **Q. Is that the apostle's signature above**
 16 **her name, Betty Peebles?**
 17 A. Yes, it is.
 18 **Q. Is that Joel Peebles' signature above**
 19 **his name?**
 20 A. Yes.
 21 **Q. And were all of those individuals there,**
 22 **Betty Peebles, Joel Peebles, Anne Wesley, William**

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1 **Meadows, and yourself, in fact, the directors of**
 2 **Jericho on the date listed there, October the 31st of**
 3 **2007?**
 4 A. Yes.
 5 **Q. And directing your attention to tab 18,**
 6 **the filing with the District of Columbia on January**
 7 **the 23rd, 2008, where the directors are listed as**
 8 **Betty Peebles, Joel Peebles, William meadows, Anne**
 9 **Wesley, and yourself, Dorothy Williams, were those**
 10 **individuals, in fact, the directors of Jericho on**
 11 **January the 23rd of 2008?**
 12 A. Yes.
 13 **Q. Directing your attention to tab 19, the**
 14 **individuals listed here, Betty Peebles, Joel Peebles,**
 15 **Anne Wesley, and yourself as directors on the Maryland**
 16 **personal property return that was filed at the State**
 17 **of Maryland, it appears to be, for the calendar**
 18 **year 2008, were those the individuals who were**
 19 **trustees of the corporation?**
 20 MR. MARKS: Let me object to that
 21 question.
 22 The document does not state that anyone

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1 was the director. If you look, it states that they
 2 were officers.
 3 MR. MALONEY: It says officers and names
 4 of directors, and those are listed as officers.
 5 BY MR. MALONEY:
 6 **Q. Were those the officers of the**
 7 **corporation?**
 8 A. Yes, they were.
 9 **Q. All right. And then finally before we**
 10 **break for lunch, I'm going to show you the documents**
 11 **that are listed here, tab -- tab 20, March 15, 2009, a**
 12 **Resolution of the Board of Trustees as to who will**
 13 **serve as trustees. I'm directing you to page 2.**
 14 **Is that your signature there?**
 15 A. Yes, it is.
 16 **Q. And what do you remember about the**
 17 **circumstances associated with the signing of this**
 18 **document?**
 19 A. It happened after church --
 20 **Q. Uh-huh.**
 21 A. -- I do know that. After church
 22 service, Anne Wesley and I had left church.

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1 **Q. Uh-huh.**
 2 A. I received a phone call from Denise
 3 Killen --
 4 **Q. Uh-huh.**
 5 A. -- that Pastor wanted to see me --
 6 **Q. Uh-huh.**
 7 A. -- and Anne --
 8 **Q. Uh-huh.**
 9 A. -- and we went back.
 10 When we went back, we had documents to
 11 sign.
 12 **Q. And you were presented with this**
 13 **document to sign?**
 14 A. I was presented with this document and
 15 another one, and I don't see it in this book.
 16 **Q. I'm going to show you the other one.**
 17 MR. MALONEY: Mark this quickly.
 18 MR. MARKS: It's already marked. That's
 19 an exhibit in --
 20 MR. MALONEY: Well, that's a good point,
 21 Counsel. This is Plaintiff's A in the May 10th, 2011
 22 depositions.

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1 BY MR. MALONEY:
 2 **Q. If you could grab ahold of that, is that**
 3 **the document you're referring to?**
 4 A. No.
 5 **Q. You don't recall seeing that document?**
 6 A. Um --
 7 **Q. Is that your signature there on that**
 8 **document, the second line?**
 9 A. Yes, that's my signature.
 10 **Q. Did you sign that on March 15th of 2009?**
 11 A. This is not the document, though.
 12 **Q. There was another document that you were**
 13 **presented with as well; is that correct?**
 14 A. Yes, it was.
 15 **Q. And did you sign both of those documents**
 16 **at the same time?**
 17 MR. MARKS: Here's the deposition
 18 exhibit (indicating).
 19 THE WITNESS: Yes, I did.
 20 BY MR. MALONEY:
 21 **Q. And was any explanation given to you by**
 22 **the apostle or anyone else about what these documents**

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1 **were or why you were signing them?**
 2 A. Not at the time.
 3 **Q. And did you sign them simply because you**
 4 **were asked to sign them?**
 5 A. Yes, I did.
 6 **Q. And who asked you to sign them?**
 7 A. Apostle.
 8 **Q. She simply -- what did she say, just**
 9 **would you please sign these?**
 10 A. Yes, sir.
 11 **Q. And was anyone else present when you**
 12 **signed them other than yourself and Anne Wesley?**
 13 A. Yes, there were other people in the
 14 room.
 15 **Q. Who else was in the room with you, if**
 16 **you can recall?**
 17 A. Norma Lewis, Jennie Jackson, LaShonda
 18 Terrell, Bruce Landsdowne, and Gloria Magruder, along
 19 with the apostle.
 20 **Q. Now, was there ever a formal meeting**
 21 **held on March 15th, 2009 of the board of trustees that**
 22 **you believed existed that day to consider any of these**

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1 **issues? And by that, I mean Betty Peebles, William,**
 2 **Meadows, Anne Wesley, yourself, or Joel Peebles, Sr.**
 3 **Was there ever a meeting of those individuals that day**
 4 **that you're aware of?**
 5 A. No.
 6 **Q. Was there ever any meeting -- a formal**
 7 **meeting of any board that day that you're aware of?**
 8 A. No.
 9 **Q. Was it simply a situation where you were**
 10 **asked to sign this and did and then went on your way?**
 11 A. That's right.
 12 **Q. Was there any discussions of a -- of a**
 13 **group nature, of a board nature that you recall that**
 14 **day?**
 15 A. No.
 16 MR. MALONEY: Let's take a break for
 17 lunch.
 18 MR. MARKS: All right.
 19 THE VIDEOGRAPHER: Going off the record.
 20 The time is 12:39 p.m.
 21 (Whereupon, at 12:39 p.m., the
 22 deposition in the above-entitled matter

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1 was temporarily recessed to reconvene at
2 1:25 p.m. this same day.)
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1 (1:30 p.m.)
2 THE VIDEOGRAPHER: Back on the record.
3 The time is 1:30 p.m.
4 BY MR. MALONEY:
5 **Q. I'd like you to now turn your attention**
6 **to tab 25. I'm showing you the resignation letter**
7 **dated 27 May 2009.**
8 **Is that your signature there?**
9 A. Yes, it is.
10 **Q. And did you, in fact, resign from the**
11 **board of trustees, the purported board, on May 27,**
12 **2009?**
13 A. Yes, I did.
14 **Q. Why did you resign from the board of**
15 **trustees?**
16 A. I'm not aware right now.
17 **Q. So you have no idea why, in fact, you**
18 **did resign from the board of trustees?**
19 A. There was a request by the pastor.
20 **Q. And why did the pastor request it, if**
21 **you know?**
22 A. I don't know. I have no recollection.

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1 **Q. Well, it says here above your signature,**
2 **"Due to the limitation of the number of trustees per**
3 **the bylaws of the church, I resign from the board of**
4 **trustees."**
5 **When you said there was a limitation of**
6 **the number of trustees, what limitation were you**
7 **referring to when you signed this document?**
8 A. I'm not aware.
9 **Q. Did you prepare this document?**
10 A. No, I didn't.
11 **Q. Who prepared it?**
12 A. I'm not aware.
13 **Q. How did it come to be that you signed**
14 **the document?**
15 A. It was given to me.
16 **Q. Who gave it to you?**
17 A. Denise Killen.
18 **Q. And how -- was this while you were**
19 **working during the day, or what happened?**
20 A. Yes, while I was working during the day.
21 **Q. Did she hand you the document and ask**
22 **you to sign it?**

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1 A. Yes.
2 **Q. Did she explain it to you?**
3 A. No.
4 **Q. She just asked you to sign it?**
5 A. Yes.
6 **Q. Did you know what you were signing when**
7 **you signed it?**
8 A. Yes, I saw -- I saw the statement.
9 **Q. Did you know what you were signing when**
10 **you signed those documents back on March the 15th of**
11 **2009, when you and Ms. Wesley signed the documents?**
12 MR. MARKS: I'm sorry, Counsel, what
13 document -- what tab are you referring to?
14 MR. MALONEY: We're referring to
15 Exhibit A right here (indicating), and also the
16 earlier document that appears, I believe, as
17 number 20.
18 THE WITNESS: Yes, I did.
19 BY MR. MALONEY:
20 **Q. And who explained those documents to**
21 **you, if anyone?**
22 A. Just the statement from the top.

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1 **Q. That's all you knew?**
 2 A. Yes.
 3 **Q. The -- was there ever a meeting on**
 4 **May 27th, 2009 to get you to resign, or did it just**
 5 **happen at your desk with you and Ms. Killen?**
 6 A. Not to my knowledge.
 7 **Q. How about the other resignations that**
 8 **occurred on that date? Bruce Landsdowne and Norma**
 9 **Lewis and earlier LaShonda Terrell, do you know**
 10 **anything about their resignations?**
 11 A. No, I don't.
 12 **Q. Do you know anything about there being**
 13 **any limitations in the bylaws? Do you know whether**
 14 **there is such a limitation?**
 15 A. No, I didn't.
 16 **Q. How about Jennie Jackson? Do you know**
 17 **anything about her resignation?**
 18 A. No, I don't.
 19 **Q. How about LaShonda Terrell's departure**
 20 **from the congregation as a whole?**
 21 A. Don't know anything about that.
 22 **Q. Were you aware of it?**

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1 A. No.
 2 **Q. How about Bruce Landsdowne's departure**
 3 **from the congregation as a whole? Did you know**
 4 **anything about it?**
 5 A. No, I didn't.
 6 **Q. With respect to the -- were you aware**
 7 **that the following day -- showing you tab 26, that the**
 8 **following day Clifford Boswell was elected as a**
 9 **trustee upon your resignation and that of Jackson,**
 10 **Lewis, Terrell, and Landsdowne?**
 11 A. No, I didn't.
 12 **Q. Did anyone explain that to you?**
 13 A. I didn't know anything about it.
 14 **Q. From the time that you signed the**
 15 **documents on March 15th, 2009 purportedly putting you**
 16 **and others on the board until the time that you**
 17 **resigned on May 27th, 2009, did you ever participate**
 18 **in a meeting of the board of trustees?**
 19 MR. MARKS: Let me object to that
 20 question, Counsel.
 21 Did you refer to the March 15, 2009
 22 document, which is tab 20, as the document that placed

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1 her on the board?
 2 MR. MALONEY: Well, let's simplify this
 3 so we don't get into a debate on that.
 4 BY MR. MALONEY:
 5 **Q. Between March 15th of 2009 and March --**
 6 **and May 27th of 2009, the date of your resignation,**
 7 **did you ever attend, in between those dates, a meeting**
 8 **of the board of trustees?**
 9 A. No, I didn't.
 10 **Q. Were you ever aware of a meeting of the**
 11 **board of trustees ever being called?**
 12 A. No, I wasn't.
 13 **Q. Do you -- were you aware of the board of**
 14 **trustees conducting any board business between**
 15 **March 15th of 2009 and May 27th of 2009?**
 16 A. No, I wasn't.
 17 **Q. At the time that you signed the document**
 18 **on the 20th -- that's Exhibit 20 with respect to the**
 19 **board of trustees -- did anyone give you any**
 20 **explanation as to why Joel Peebles' signature was not**
 21 **on that document, a signature blank or a signature**
 22 **line?**

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1 A. No, they didn't.
 2 **Q. Is that the first time that you had ever**
 3 **seen a board document since 1998 that did not have**
 4 **Joel Peebles' signature on it?**
 5 MR. MARKS: Let me object to that
 6 question. There's no foundation as to the document
 7 she saw prior to March 15, 2009.
 8 BY MR. MALONEY:
 9 **Q. Go ahead. You may answer.**
 10 MR. MARKS: If you know.
 11 THE WITNESS: I'm not aware.
 12 BY MR. MALONEY:
 13 **Q. You're not aware of any such document**
 14 **that did not have Joel Peebles' signature on it?**
 15 A. Could you repeat your question?
 16 **Q. Are you aware of any board document --**
 17 **any document that bore the signatures of the board of**
 18 **trustees prior to this date, from up until -- back to**
 19 **1998 that did not contain Joel Peebles, Sr.'s name on**
 20 **it?**
 21 A. I'm not aware of any.
 22 **Q. Did anyone ever explain to you how Joel**

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1 **Peebles' name was not a part of this board of trustees**
 2 **list?**
 3 A. No, they didn't.
 4 **Q. Did you have any understanding at all as**
 5 **to how Joel Peebles was suddenly going to stop being a**
 6 **member of the board of trustees in March of 2009?**
 7 A. I didn't know Joel was a member of the
 8 board of trustees.
 9 **Q. Well, you've testified earlier as to a**
 10 **large number of documents that reflected him as a**
 11 **member of the board, along with yourself. My question**
 12 **is a different one.**
 13 **My question was, did anyone ever tell**
 14 **you or explain to you how Joel Peebles was going to**
 15 **stop being a member of the board of trustees?**
 16 A. No, they didn't.
 17 **Q. And with respect to Joel Peebles, Sr.,**
 18 **are you aware of him getting any notice of any kind as**
 19 **to the actions that were taken on March the 15th,**
 20 **2009?**
 21 A. No, I'm not.
 22 **Q. Did you yourself ever tell Joel Peebles,**

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1 **Sr. about the actions on March 15th, 2009?**
 2 A. No, I didn't.
 3 **Q. Did you ever tell him that the other**
 4 **individuals were elected to the board of trustees on**
 5 **March 15th, 2009?**
 6 A. No, I didn't.
 7 **Q. Were those actions ever made public to**
 8 **the congregation or to anyone else, as far as you**
 9 **know?**
 10 A. I'm not aware.
 11 **Q. After you left the board of trustees on**
 12 **May the 27th of 2009, did there come a time when you**
 13 **got back on the board?**
 14 A. Yes, I did.
 15 **Q. And when was that?**
 16 A. In November of 2010.
 17 **Q. And what happened to cause you to become**
 18 **a member of the board in November of 2010?**
 19 A. Because Pastor had already told me she
 20 wanted me back.
 21 **Q. Uh-huh.**
 22 **And when did she tell you she wanted you**

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1 **back?**
 2 A. In some of the conversations that I had
 3 with her when I visited her.
 4 **Q. At her home?**
 5 A. Yes.
 6 **Q. Was this on her deathbed?**
 7 A. I can't say it was her deathbed.
 8 **Q. Was it her bed?**
 9 A. Yes.
 10 **Q. And was she in bed when she had these**
 11 **conversations with you?**
 12 A. Yes.
 13 **Q. And when did she have these**
 14 **conversations with you?**
 15 A. I don't recall.
 16 **Q. Well, was it a month before she died, or**
 17 **six weeks, or five months, or what?**
 18 A. I visited her in April --
 19 **Q. Uh-huh.**
 20 A. -- and we had a long talk about some
 21 stuff, and that was one of the times that we talked,
 22 but she told me that several times.

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1 **Q. April of 2010?**
 2 A. '10, yes.
 3 **Q. And what did she tell you?**
 4 A. I don't recall the conversation.
 5 **Q. Did she tell you anything about wanting**
 6 **you to be on the board?**
 7 A. She told me that, yes, but --
 8 **Q. Okay.**
 9 A. -- I don't recall the conversation.
 10 **Q. Was that the only time she told you she**
 11 **wanted you on the board?**
 12 A. She told me many times. She told me
 13 times after that too.
 14 **Q. All right. How many times did you visit**
 15 **her at home?**
 16 A. After April, I visited her about seven
 17 times.
 18 **Q. Each time you visited her, did she tell**
 19 **you she wanted you on the board?**
 20 A. No. Not each time, no.
 21 **Q. How many times?**
 22 A. I don't remember.

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1 **Q. Well, how come you didn't go on the**
 2 **board in April of 2009 if she told you that then?**
 3 A. I can't answer that. I don't know the
 4 answer to that.
 5 **Q. Well, what happened in November of 2010**
 6 **after her death that caused you to go on the board?**
 7 A. The board elected me on.
 8 **Q. Did you ask to be on the board?**
 9 A. No.
 10 **Q. Who came to you and said we want to**
 11 **elect you?**
 12 A. They didn't say they wanted to elect me.
 13 They were solidifying what the pastor had asked --
 14 what the apostle had asked.
 15 **Q. Was there an actual election to choose**
 16 **you at a regularly-called board meeting?**
 17 A. Yes, there was.
 18 **Q. And when was that meeting held?**
 19 A. In November.
 20 **Q. And do you know the date on November?**
 21 A. No, I don't.
 22 **Q. Are there any documents which show that**

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1 **you were elected?**
 2 A. Yes, there is.
 3 **Q. All right. And what did that document**
 4 **show?**
 5 A. I don't recall.
 6 **Q. When you were elected, were you**
 7 **concerned about the conflict between you serving as a**
 8 **salaryed chief financial officer and also as a**
 9 **director?**
 10 MR. MARKS: Let me object to that
 11 question.
 12 There's no foundation that her serving
 13 in those capacities was a conflict.
 14 BY MR. MALONEY:
 15 **Q. Go ahead.**
 16 MR. MARKS: You may answer if you know.
 17 THE WITNESS: No, I didn't.
 18 BY MR. MALONEY:
 19 **Q. Has there been any procedure put into**
 20 **place to deal with the fact that the board is supposed**
 21 **to simultaneously oversee your performance as CFO**
 22 **while you serve on that board?**

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1 A. No, there wasn't.
 2 **Q. Have you ever excused yourself from a**
 3 **board meeting or recused yourself from board action**
 4 **because of your status as the salaryed chief financial**
 5 **officer?**
 6 A. No, I didn't.
 7 **Q. Has the board done anything to deal with**
 8 **the problem of segregation of duties in terms of your**
 9 **oversight role on the board and your role as the chief**
 10 **financial officer?**
 11 MR. MARKS: Let me object to that
 12 question. There's no foundation that there was ever a
 13 problem in her serving in those capacities, as the
 14 question was characterized, but you may answer the
 15 question if you know.
 16 THE WITNESS: No.
 17 BY MR. MALONEY:
 18 **Q. Are you aware of the board doing**
 19 **anything like that?**
 20 A. No.
 21 **Q. After you rejoined the board in November**
 22 **of 2010, did you ever attend any board meetings?**

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1 A. Yes, I did.
 2 **Q. What was the first board meeting that**
 3 **you attended?**
 4 A. It was in November.
 5 **Q. What was the subject of that board**
 6 **meeting?**
 7 A. The day-to-day operation of the church.
 8 **Q. I would like to -- were you ever asked**
 9 **to prepare an affidavit in this case?**
 10 A. Yes, I was.
 11 **Q. All right. Who asked you to do that?**
 12 A. My attorney --
 13 **Q. And --**
 14 A. -- Isaac Marks.
 15 **Q. Okay. I would like to now direct your**
 16 **attention to Exhibit Number -- tab number 28.**
 17 A. Okay.
 18 **Q. Do you recall getting this letter from**
 19 **Joel Peebles, Sr.?**
 20 A. Yes.
 21 **Q. Now I'll direct your attention to**
 22 **tab 29, a letter dated September 21, 2010.**

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1 **Is that your signature?**
2 A. Yes, it is.
3 **Q. Who prepared that letter?**
4 A. Dorothy.
5 **Q. Dorothy who?**
6 A. Williams.
7 **Q. Did anybody assist you in preparing the**
8 **letter?**
9 A. No.
10 **Q. Did you review the letter with anyone**
11 **else prior to sending it?**
12 A. No.
13 **Q. Did you discuss it with the apostle?**
14 A. No.
15 **Q. Did you discuss it with Ms. Killen?**
16 A. No.
17 **Q. Did you discuss it with counsel?**
18 A. No.
19 **Q. Now, you say here, I believe calling**
20 **such a meeting -- first of all, I am concerned about**
21 **the emergency meeting because notice was not properly**
22 **given.**

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1 **What notice requirements are you**
2 **referring to?**
3 A. Him addressing his mother.
4 **Q. Well, what notice was supposed to be**
5 **given that you're referring to? What would have been**
6 **proper?**
7 A. Letting the meeting that he called --
8 the people at the meeting that he called know that he
9 had consulted with his mother --
10 **Q. So he should have --**
11 A. -- to have this meeting.
12 **Q. So he should have told his mother first;**
13 **is that correct?**
14 A. Yes, sir.
15 **Q. All right. Is that why you believe that**
16 **notice was not properly given?**
17 A. Yes, it is.
18 **Q. And when you say I believe calling such**
19 **a meeting is contrary to Apostle Betty's wishes and**
20 **disrespectful of her authority, why did you say that?**
21 A. Because he tried to take the church over
22 when she had -- when she was in her -- on her bed

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1 sick.
2 **Q. When you say contrary to her wishes,**
3 **what wishes, if any, had she expressed to you?**
4 A. Okay. She expressed that, and I'll --
5 I'll just say I don't want to misquote her, but, in
6 essence, she had expressed that she wanted to keep
7 Joel out of the finan- -- the administration portion
8 of the church.
9 **Q. When did she tell that to you?**
10 A. Many times.
11 **Q. At her house?**
12 A. At her house. At the church.
13 **Q. Did she tell you --**
14 A. On the telephone.
15 **Q. Did she tell you why she wanted that?**
16 A. No, she didn't.
17 **Q. You say, "In my last conversation with**
18 **the pastor, she was competent and in full control..."**
19 **When was that last conversation prior to**
20 **the date of this letter, September the 21st, 2010?**
21 A. The week before.
22 **Q. All right. And was that in person or by**

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1 **the telephone?**
2 A. In person.
3 **Q. And tell me what she said in that**
4 **conversation that caused you to conclude that she was**
5 **competent and in full control?**
6 A. Well, we -- we -- I went over and I
7 prayed with her --
8 **Q. Uh-huh.**
9 A. -- and we had a conversation, and I -- I
10 just can't remember all of the conversation, but she
11 did mention or say to me, "Dot, you got everything in
12 control, don't you?"
13 And I said, "Yes."
14 **Q. Did she say anything about Joel Peebles,**
15 **Sr. in that conversation? Did she mention his name?**
16 A. Yes, she did.
17 **Q. What did she say about him?**
18 A. That was when she asked me if I had
19 everything in control.
20 **Q. Okay. Did you construe that to mean to**
21 **keep the control away from Joel Peebles, Sr.?**
22 A. I can't answer that. I can't assume.

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<p>1 Q. Now I would like to direct your 2 attention to tab 40. 3 Looking at page 2, is that your 4 signature? 5 A. Yes. 6 Q. And is that an affidavit that you 7 signed? 8 A. Yes, it is. 9 Q. Did you prepare that affidavit? 10 A. No. 11 Q. Who prepared the affidavit? 12 A. Isaac Marks -- 13 Q. Okay. 14 A. -- according to what I see. 15 Q. Now, looking at paragraph 2, you state, 16 In March 2009, the surviving members of the original 17 board of trustees and I elected Betty Peebles, Gloria 18 McClam-Magruder, Denise Killen, and Clarence Jackson, 19 and me as successor members. 20 Now, when you say the surviving members 21 of the original board of trustees, how do you know 22 that they're the surviving members of the original</p>	<p>1 question. 2 There's no foundation that Joel Peebles 3 was ever one of the original members of the board. 4 MR. MALONEY: Well, no foundation this 5 witness was either, for that matter. We'll get to 6 there, and my question was not an original member of 7 the board of trustees. 8 BY MR. MALONEY: 9 Q. My question was this: Any time at all, 10 did you see Joel Peebles removed, terminated, or 11 otherwise had his service ended as a member of the 12 board of trustees prior to March the 15th of 2009? 13 MR. MARKS: And let me object to the 14 question. There's no foundation that Joel Peebles was 15 ever elected a member of the board of trustees. 16 You can answer if you know. 17 BY MR. MALONEY: 18 Q. Go ahead. 19 A. I'm not aware that he was a member of 20 the board of trustees. 21 Q. Well, you spent quite a bit of time 22 before lunch going through documents and acknowledging</p>
Page 99	Page 101
<p>1 board of trustees? 2 A. Surviving members? Because they were 3 the ones -- the board of trustees at that time from 4 March of 2009. This is the board that Pastor put in 5 place -- 6 Q. Well, how do you know -- 7 A. -- Apostle. 8 Q. How do you know that that's the board 9 Pastor put in place? 10 A. Because my signature is on those papers. 11 Q. Okay. But Joel Peebles' signatures are 12 on those papers too. 13 A. No, not on the ones that she put in 14 place in March of 2009. 15 Q. But I'm talking about before this date, 16 okay, the surviving members of the original board of 17 trustees. 18 Are you aware of any time Joel Peebles 19 being removed, or resigned, or otherwise had his 20 service ended or terminated on the board of trustees 21 prior to March 15th of 2009? 22 MR. MARKS: Let me object to the</p>	<p>1 that he was a member of the board. 2 A. I know I did, but I -- I've been here 3 since quarter to 8:00 this morning -- 4 Q. Uh-huh. 5 A. -- I haven't eaten anything, I haven't 6 drank anything, and, yes, I was looking at those 7 documents. I never knew he was on the board. 8 Q. Uh-huh. 9 So do you need to take a little break 10 now and have something to eat or drink? 11 A. No, I don't. I just left lunch. 12 Q. Okay. 13 A. I'm refreshed. 14 Q. All right. So now you feel better? 15 A. I do. 16 Q. Uh-huh. 17 And with respect to the original members 18 of the board of trustees, you describe them as Betty 19 Peebles, William Meadows, Anne Wesley, and yourself; 20 is that correct? 21 A. Could you rephrase that? 22 Q. You state here that Betty Peebles,</p>

<p style="text-align: right;">Page 102</p> <p>1 William Meadows, Anne Wesley, and I were the surviving 2 members of the original board of trustees. You state 3 that in paragraph number 1. 4 Do you see that? 5 A. Yes. Yes, I do. 6 Q. How do you know that -- 7 MR. MARKS: Actually, that's paragraph 8 number 2, Counsel. 9 BY MR. MALONEY: 10 Q. Well, how do you know that you were a 11 member of the original board of trustees? 12 A. Could you repeat that question? 13 Q. How do you know that you were a member 14 of the original board -- 15 MR. MALONEY: And, Mr. Marks, please 16 don't be pointing at any documents to her. 17 MR. MARKS: I'm reading. I'm not 18 pointing to a document. This is her document you're 19 referring to. 20 MR. MALONEY: I understand that. 21 MR. MARKS: This is tab 40. 22 MR. MALONEY: I understand that.</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. You weren't part of Jericho in 1962, 2 were you? 3 A. No, I wasn't. 4 Q. In fact, you were living in the state of 5 North Carolina at that time, correct? 6 A. '62? Yes, I was. 7 Q. All right. So it is not accurate, is 8 it, that you were a member of the original board of 9 trustees; is that correct? 10 MR. MARKS: Let me object to that 11 question, Counsel. That's a mischaracterization. 12 When you refer to tab number 1, Reverend 13 James Peebles, Alice Harvey, and Betty Peebles are 14 listed as incorporators. They're not listed as 15 trustees. So that's a mischaracterization of this 16 document. 17 BY MR. MALONEY: 18 Q. Well, let me ask you this question, 19 Ms. Williams: You understand the word original means 20 the first, right? 21 A. Yes, I do. 22 Q. All right. Do you know when the first</p>
<p style="text-align: right;">Page 103</p> <p>1 BY MR. MALONEY: 2 Q. But my question to her is, how do you 3 know that you're a member of the original board of 4 trustees? 5 A. The word original is getting me. 6 Q. Is getting you? 7 A. Yeah. 8 Q. You probably weren't a member of the 9 original board of trustees, were you? 10 A. I can't -- original means from the 11 beginning. 12 Q. That's right, like original sin. 13 A. I was not with Jericho when they first 14 set up. 15 Q. Exactly. 16 Let's show your attention to tab 17 number 1, if you would. This is the Certificate of 18 Incorporation of Jericho on November 6th, 1962 with 19 the incorporators being Alice Harvey, Betty Peebles, 20 and James Peebles. 21 Do you see that? 22 A. Yes, I do.</p>	<p style="text-align: right;">Page 105</p> <p>1 board of trustees was elected? 2 A. No, I don't. 3 Q. Do you know whether or not the 4 individuals that you said were the original members of 5 the board of trustees, Betty Peebles, William, 6 Meadows, Anne Wesley, and yourself, were, in fact, the 7 original trustees or not? Do you have any idea 8 whether that's true? 9 A. I'm not aware of that. 10 Q. Okay. Looking at your affidavit 11 paragraph 8, you state, Betty Peebles removed Joel 12 Peebles, Sr. as headmaster of the school for 13 mismanagement. 14 What do you know about that? 15 A. Well -- 16 MR. MARKS: Hold on one second. 17 I'm sorry, Counsel, you said 18 paragraph 8? 19 MR. MALONEY: Yes. 20 MR. MARKS: Of page 2? 21 MR. MALONEY: Page 2 of tab 40. 22 MR. MARKS: That's not what my</p>

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1 paragraph 8 says.
 2 MR. MALONEY: Well, I think we have
 3 different documents, then. I'm looking at tab 40.
 4 THE WITNESS: Tab 40.
 5 MR. MARKS: I'm sorry, my mistake. It
 6 would help if I was on the right tab.
 7 MR. MALONEY: No problem.
 8 MR. MARKS: I was on 39.
 9 Okay. I stand corrected.
 10 THE WITNESS: What was your question?
 11 BY MR. MALONEY:
 12 **Q. You state at page -- tab 2 -- page 2,**
 13 **paragraph 8 that Betty Peebles removed Joel Peebles as**
 14 **headmaster of the school for mismanagement.**
 15 **What do you know about that?**
 16 A. I knew about the kids that was going
 17 over for the scholarship, and the kids that was going
 18 that wasn't paying fees to go. That, I knew about.
 19 **Q. Who made those decisions?**
 20 A. What decisions?
 21 **Q. As to who would pay and who would not**
 22 **pay.**

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1 A. I was told it was Joel Peebles and
 2 Glennis Gill.
 3 **Q. Who made those decisions?**
 4 A. Joel Peebles and Glennis Gill.
 5 **Q. And who told you that?**
 6 A. Through investigation.
 7 **Q. What investigation was that?**
 8 A. Of finding the money was misappropriated
 9 or mismanaged.
 10 **Q. And who conducted that investigation?**
 11 A. Apostle Peebles.
 12 **Q. Anyone else?**
 13 A. And Minnie Williams.
 14 **Q. And which Williams?**
 15 A. Minnie Williams.
 16 **Q. And who is that?**
 17 A. She's the registrar of the academy.
 18 **Q. You yourself don't have any personal**
 19 **knowledge as to whether there was mismanagement or**
 20 **not, do you?**
 21 A. Only according to the reports.
 22 **Q. What reports are those?**

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1 A. That was given.
 2 **Q. Is this a written report or a verbal**
 3 **report?**
 4 A. Written reports.
 5 **Q. All right. And do you still have that**
 6 **written report?**
 7 A. No, I don't.
 8 **Q. Have you given any financial records or**
 9 **other documents over to your counsel for production in**
 10 **this case?**
 11 A. Some, yes.
 12 **Q. What have you turned over?**
 13 A. Salaries, the report on the school, the
 14 reports for the church, the quarterly and the audit
 15 for 2009, and that's it.
 16 **Q. When did you turn those over?**
 17 MR. MARKS: Counsel, let me object to
 18 when she provided documents to me. I probably should
 19 have objected on the documents that were provided, but
 20 that's out. So I will object to when she provided
 21 these documents to me. That treads into privileged
 22 information.

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1 You don't have to answer that.
 2 BY MR. MALONEY:
 3 **Q. Why are those the only documents you**
 4 **turned over?**
 5 MR. MARKS: I'm going to also object to
 6 that, because any other documents she's turned over to
 7 me are privileged under attorney-client privilege.
 8 You don't have to answer that.
 9 MR. MALONEY: The documents themselves
 10 aren't privileged.
 11 MR. MARKS: Well, how she handled them
 12 with me is.
 13 MR. MALONEY: Not necessarily.
 14 MR. MARKS: Well, I'm advising her not
 15 to answer that question.
 16 BY MR. MALONEY:
 17 **Q. Where are the rest of the documents that**
 18 **you keep under control? Are they at the finance**
 19 **office?**
 20 A. Yes, they are.
 21 **Q. Do you have any accountants doing any**
 22 **work for the church other than the one you referred to**

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1 earlier?
 2 A. No, I don't.
 3 **Q. I'm going to refer you to your**
 4 **affidavit, paragraph 6, wherein Mr. Peebles asked if**
 5 **William Meadows and Anne Wesley knew they signed the**
 6 **resolution to take them off the board and I said they**
 7 **should have because it was done at the same time. A**
 8 **new board was not mentioned at the meeting on**
 9 **September 21st, 2010, because I did not think it was**
 10 **my place to tell them.**
 11 **What happened on September 21st, 2010?**
 12 A. Elder Joel left the hospital, came to
 13 the church and had a meeting, and he told us the
 14 meeting would take ten minutes. I left the meeting
 15 into a half an hour. And when he came, he didn't tell
 16 us he was bringing Bobby. He brought Bobby, and Bobby
 17 came in woofing --
 18 **Q. Woofing?**
 19 A. -- all loud.
 20 Yes, all loud, saying that the apostle
 21 was incompetent, and, you know, I just thought it was
 22 very inappropriate, and --

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1 **Q. Go ahead.**
 2 A. -- and as it being inappropriate, I
 3 passed Elder Joel the letter that you saw that I
 4 signed and I got up to leave, because I -- as I talked
 5 to the apostle, she was not incompetent to me.
 6 **Q. Is that because of Bobby Henry's**
 7 **comments that you got up to leave?**
 8 A. Somewhat.
 9 **Q. And what else? Anything else?**
 10 A. And Bobby Henry's comment, and Elder
 11 Joel did not say anything in his mother's defense, and
 12 it bothered me.
 13 **Q. Your letter is dated September 21st,**
 14 **2010, isn't it?**
 15 A. Yes, that's the same day we had the
 16 meeting.
 17 **Q. In fact, the meeting was not until the**
 18 **evening, correct?**
 19 A. Right.
 20 **Q. In fact, you had already prepared that**
 21 **letter earlier in the day; isn't that true?**
 22 A. Yes, it is.

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1 **Q. All right. So you can't say that letter**
 2 **was prepared because of something Bobby Henry did**
 3 **after you prepared it?**
 4 A. I'm sorry, Counsel, I did not say
 5 because of something Bobby Henry did. I gave him the
 6 letter because I knew we were having a meeting and the
 7 meeting was not going to be good.
 8 **Q. So you knew in advance the meeting was**
 9 **not going to be good?**
 10 A. I did.
 11 **Q. All right. So it's clear you prepared**
 12 **and signed that letter long before -- much earlier in**
 13 **the day than the time you had that meeting, correct?**
 14 A. I was a few minutes late getting to the
 15 meeting, because I was getting the letter ready.
 16 **Q. All right. So, in other words, you were**
 17 **late going to the meeting because you had already --**
 18 **because of the time you spent typing the letter,**
 19 **correct?**
 20 A. Yes.
 21 **Q. Okay. And why when you prepared the**
 22 **letter -- why did you prepare the letter in advance of**

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1 **the meeting?**
 2 A. Why did I prepare the letter in advance?
 3 **Q. Yes. Right.**
 4 A. Because I knew it wasn't going to be
 5 good.
 6 **Q. You could --**
 7 A. He told me he was -- he was -- he was at
 8 the hospital, he left the hospital, and came to have
 9 the meeting. And when he had the meeting, Bobby came
 10 with him.
 11 **Q. At that --**
 12 A. That was a red flag right there for me.
 13 **Q. Now, at that meeting, you say in your**
 14 **affidavit it was not my place to tell them about the**
 15 **new board. You say that in paragraph 6 of your**
 16 **affidavit. The new board was not mentioned at the**
 17 **meeting on September 21, 2010, because I did not think**
 18 **it was my place to tell them.**
 19 **Why was it not your place to tell them?**
 20 A. First of all, I wasn't on the board --
 21 **Q. All right.**
 22 A. -- to tell them because of the

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1 March 15th date.
 2 **Q. Right.**
 3 A. And secondly, it's -- Pastor always did
 4 the controlling of the church, and it was her place to
 5 tell him, not mine.
 6 **Q. So all these other purported trustees**
 7 **were in that meeting on September 21st?**
 8 A. No, they weren't.
 9 **Q. Who was in the meeting?**
 10 A. Elder Meadows, Deacon Anne, Deacon
 11 Dorothy, Elder Joel, and Bobby Henry.
 12 **Q. And no one at that meeting who was on**
 13 **this so-called new board ever spoke up to say that**
 14 **they were on the board --**
 15 A. No.
 16 **Q. -- at that meeting?**
 17 MR. MARKS: Objection.
 18 Counsel, there's a mis- -- there's a
 19 mischaracterization of the testimony. There's no
 20 testimony that any of the current board members were
 21 at that September 21, 2010 meeting with Joel Peebles.
 22 BY MR. MALONEY:

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1 **Q. Did you ever tell Joel Peebles that he**
 2 **was not on the board of trustees at that time?**
 3 A. No, I didn't.
 4 **Q. Did anyone else tell him that, to your**
 5 **knowledge, at that meeting?**
 6 A. I'm not aware.
 7 **Q. What was the plan, if you know, as to**
 8 **when this was going to be disclosed that a new group**
 9 **was holding itself out as the board?**
 10 MR. MARKS: Let me object to that
 11 question, Counsel.
 12 There's a mischaracterization. The
 13 witness has already testified she was not on the board
 14 as of September 21, 2010.
 15 BY MR. MALONEY:
 16 **Q. Go ahead.**
 17 MR. MARKS: You may answer if you know.
 18 THE WITNESS: I'm not aware.
 19 BY MR. MALONEY:
 20 **Q. After the apostle died, who did you**
 21 **report to on a day-to-day basis?**
 22 A. Denise Killen.

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1 **Q. And was that true before the apostle**
 2 **died?**
 3 A. Yes, it was.
 4 **Q. Has anyone else received pay raises**
 5 **besides yourself?**
 6 MR. MARKS: At what point are we
 7 talking?
 8 MR. MALONEY: From 2009 forward.
 9 THE WITNESS: Only Deacon Jackson.
 10 BY MR. MALONEY:
 11 **Q. And why did Deacon Jackson receive a pay**
 12 **raise?**
 13 A. I have no idea.
 14 **Q. Did you help process the pay raise?**
 15 A. Yes, I did.
 16 **Q. And tell me what you did.**
 17 A. I just added it to his salary.
 18 **Q. And who instructed you to do that?**
 19 A. Pastor Betty Peebles.
 20 **Q. Uh-huh.**
 21 **And what did she tell you?**
 22 A. She called me on the telephone, and she

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1 did preface it with a memo that she was giving me and
 2 Jackson a raise.
 3 **Q. And did she say why?**
 4 A. No, she did not.
 5 **Q. Was it a complete surprise to you?**
 6 A. It really was.
 7 **Q. And how about Ms. Killen? Has she ever**
 8 **received a pay raise?**
 9 A. Yes, she did.
 10 **Q. What raise did she receive?**
 11 A. The raise was a year before.
 12 **Q. What year was that?**
 13 A. In 2009.
 14 **Q. When in 2009?**
 15 A. I want to say --
 16 MR. MARKS: Don't guess.
 17 THE WITNESS: Okay.
 18 BY MR. MALONEY:
 19 **Q. Was it at the beginning, the middle, or**
 20 **the end of the year?**
 21 A. I mean, since I'm not aware --
 22 **Q. And what was her salary raised to?**

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<p>1 A. I don't remember what it was raised to.</p> <p>2 Q. What was it before?</p> <p>3 A. I don't know.</p> <p>4 Q. So as the chief financial officer,</p> <p>5 you're unaware of what Ms. Killen makes?</p> <p>6 MR. MARKS: Let me object to the</p> <p>7 characterization of that question, Counsel.</p> <p>8 I don't think there's any foundation</p> <p>9 that the witness is supposed to have that information</p> <p>10 committed to memory.</p> <p>11 MR. MALONEY: She's the CFO, so I'm</p> <p>12 asking her.</p> <p>13 BY MR. MALONEY:</p> <p>14 Q. Do you know as the CFO how much she</p> <p>15 makes?</p> <p>16 A. No, I don't.</p> <p>17 Q. You don't have any idea as to the range</p> <p>18 of what she makes?</p> <p>19 A. No, I don't.</p> <p>20 Q. Does she make more than you?</p> <p>21 A. No, she doesn't.</p> <p>22 Q. She makes less than you?</p>	<p>1 parishioners at heart --</p> <p>2 Q. Uh-huh.</p> <p>3 A. -- and help them out of dilemmas that</p> <p>4 they might be in --</p> <p>5 Q. Uh-huh.</p> <p>6 A. -- not criticize, cut down, and continue</p> <p>7 to bring up things that has happened in their past.</p> <p>8 Q. And do you think Joel has not helped</p> <p>9 parishioners?</p> <p>10 A. I'm speaking about me, for one.</p> <p>11 Q. All right. Are you speaking about his</p> <p>12 treatment of you?</p> <p>13 A. Yes.</p> <p>14 Q. Has Joel criticized you and brought up</p> <p>15 things in your past?</p> <p>16 A. Yes, he has.</p> <p>17 Q. And are you angry about that?</p> <p>18 A. No, I'm not angry, but I don't think --</p> <p>19 when you talk to a person about something in</p> <p>20 confidence, I don't think they should constantly feed</p> <p>21 it back to you, and he has done that to me about five</p> <p>22 times since, you know, this thing went into play.</p>
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<p>1 A. I don't know the exact amount.</p> <p>2 Q. But my question is not the exact amount.</p> <p>3 My question is, does she make less than</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. And how much less, if you know?</p> <p>7 A. I don't know.</p> <p>8 Q. Why does she make less than you, the</p> <p>9 purported COO, when you're just the CFO, if you know?</p> <p>10 MR. MARKS: Objection to the question.</p> <p>11 Calls for speculation, there's no foundation, but you</p> <p>12 may answer if you know.</p> <p>13 THE WITNESS: I don't know.</p> <p>14 BY MR. MALONEY:</p> <p>15 Q. Has the board ever had a meeting to</p> <p>16 discuss salary levels?</p> <p>17 A. No, we haven't.</p> <p>18 Q. Do you know any reason why Joel Peebles</p> <p>19 should not be the pastor of the church?</p> <p>20 A. Yes.</p> <p>21 Q. What is that?</p> <p>22 A. I feel that a pastor should take the</p>	<p>1 Q. Has he betrayed your confidence with</p> <p>2 others or just said it to you?</p> <p>3 A. I can't answer that --</p> <p>4 Q. Okay.</p> <p>5 A. -- but he said it to me around other</p> <p>6 people.</p> <p>7 Q. And you were upset about that; is that</p> <p>8 correct?</p> <p>9 A. Yes, I am.</p> <p>10 Q. Any other reason you feel Joel should</p> <p>11 not be the pastor?</p> <p>12 A. Yes, there are other reasons, because</p> <p>13 the Sunday after the pastor's home-going service, he</p> <p>14 called all the elders, deacons, and ministers down on</p> <p>15 the steps of the pulpit with him, and it was very</p> <p>16 inappropriate what he did.</p> <p>17 Q. And what was it that he did?</p> <p>18 A. He called them down and he never thanked</p> <p>19 them for his mother's home-going service, working with</p> <p>20 it, for one thing, and then he said something in</p> <p>21 reference to the court case.</p> <p>22 Q. Uh-huh.</p>

31 (Pages 118 to 121)

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1 A. And he called the people down there to
 2 make them -- make the church think that they were on
 3 his side. This is my interpretation.
 4 **Q. Uh-huh.**
 5 A. To make the church think that everybody
 6 was going along with him --
 7 **Q. Uh-huh.**
 8 A. -- when he literally bashed the board.
 9 **Q. The new board?**
 10 A. Yes.
 11 **Q. What did he say?**
 12 A. I don't remember everything he said.
 13 **Q. Do you remember anything that he said?**
 14 A. No, because I tuned him out.
 15 **Q. Oh, so you're not sure what he did to**
 16 **bash, because you tuned him out?**
 17 A. Yeah.
 18 **Q. And didn't he thank the people that**
 19 **helped on the homecoming with that special dinner;**
 20 **isn't that true?**
 21 A. I -- I don't -- I can't say that.
 22 **Q. The --**

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1 A. That wasn't the reason I was given.
 2 **Q. So you were not aware of the dinner; is**
 3 **that correct?**
 4 A. Yes.
 5 **Q. Any other reason Joel should not be the**
 6 **pastor?**
 7 A. I think so, and I'm only just saying
 8 this because of my experience -- my experience in the
 9 workforce. I've never had a job that I didn't have to
 10 be trained on, and Joel's position is he just want to
 11 be put into place without training, and that's a big
 12 job.
 13 **Q. So you think he needs tutelage?**
 14 A. I do. I really do. I have no problem
 15 with him being the pastor once he get tutelage and
 16 knowledge under his belt.
 17 **Q. Who came up with this whole tutelage**
 18 **concept?**
 19 A. You did in here.
 20 **Q. I did?**
 21 A. Yes.
 22 **Q. Well --**

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1 A. You brought -- you brought tutelage in.
 2 **Q. Well, it's in the will.**
 3 A. Well, I don't know anything about the
 4 will.
 5 **Q. Uh-huh.**
 6 A. The will is not in my territory.
 7 **Q. But you never heard anyone on the board**
 8 **talk about the need for tutelage?**
 9 A. I did.
 10 **Q. Okay. That's something you believe he**
 11 **needs?**
 12 A. Yes, I do.
 13 **Q. What kind of tutelage does he need?**
 14 A. I think he needs to learn how to control
 15 his temper --
 16 **Q. Uh-huh.**
 17 A. -- for one.
 18 **Q. So temper tutelage.**
 19 A. I also think he needs to learn how to
 20 talk to people, number two.
 21 **Q. Talking tutelage.**
 22 **What else?**

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1 MR. MARKS: Let me object, Counsel, and
 2 ask that you not tend to make light of the witness's
 3 comments.
 4 MR. MALONEY: Well, isn't the whole
 5 tutelage thing sort of demeaning to the pastor?
 6 MR. MARKS: Absolutely not. There's
 7 nothing wrong -- nothing wrong with anyone getting
 8 training --
 9 MR. MALONEY: Uh-huh.
 10 MR. MARKS: -- being tutored, being
 11 under someone else's cover, if you will.
 12 BY MR. MALONEY:
 13 **Q. Who should be the person to provide**
 14 **tutelage to Joel?**
 15 A. I don't know, but he do need to go to
 16 school to learn.
 17 **Q. All right. Anything else besides temper**
 18 **and the way he talks to people?**
 19 A. No.
 20 **Q. Okay. Are you basing that on your own**
 21 **personal experience with him?**
 22 A. Yes.

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<p>1 Q. Are you concerned about the financial 2 future of Jericho? 3 A. No. 4 Q. Do you think the church is in a healthy 5 financial condition? 6 A. Yes. 7 Q. Joel before you filed suit against him, 8 did he have problems with a temper or with other need 9 for tutelage at that point? 10 A. I've seen him in some actions, yes. 11 Q. What service do you attend? 12 A. Sometimes 8:00. 13 Q. Uh-huh. 14 A. All the time 11:00. 15 Q. Sometimes you attend both? 16 A. Yes. 17 Q. Okay. What's happened to the attendance 18 at the 8:00 in the last two years? 19 A. It has dropped. 20 Q. Uh-huh. 21 How much, if you can tell? 22 A. I don't know.</p>	<p>1 Q. Who else would be interviewed besides 2 Joel Peebles? 3 A. I have no idea. 4 Q. Do you believe that it's important to 5 interview individuals for the pastor's position other 6 than Joel Peebles? 7 A. Yes, we do. 8 Q. Why is that important to do that? 9 A. As a person who has lived by God, you 10 need more than one person in that position -- to, you 11 know, seek out that position. 12 Q. So where do you think the church should 13 look for a new pastor besides Joel Peebles? 14 A. I'm not at liberty to say that. 15 Q. And why are you not at liberty to say? 16 A. I mean, I'm not aware of where they 17 should look to to find a pastor. 18 Q. Do you have anybody in mind yourself? 19 A. No, I don't. 20 Q. Is Joel Peebles an appropriate person to 21 be the full-time pastor? 22 A. Not without tutelage. I'm -- I'm -- I'm</p>
Page 127	Page 129
<p>1 Q. How about the 11:00? 2 A. It has dropped too. 3 Q. Do you have any attendance mechanisms to 4 keep track of the attendance? 5 A. No, I don't. 6 Q. Uh-huh. 7 Has the -- has the board had any 8 discussion about the attendance? 9 A. Yes, we have. 10 Q. And what's the board's plan to deal with 11 the attendance issues? 12 A. We are discussing it. We haven't made a 13 plan. We haven't set up a plan. We are discussing 14 it. 15 Q. And what's the plan as far as appointing 16 a full-time pastor? 17 A. We're discussing that too. 18 Q. Are you interviewing individuals other 19 than Joel Peebles? 20 A. Not yet. 21 Q. Is there a plan to do so? 22 A. Yes, it is.</p>	<p>1 still going to say that. 2 Q. So you're opposed to him becoming pastor 3 without tutelage? 4 A. Right now, yes, I am. 5 Q. When you say right now, do you expect 6 that position to change? 7 A. Yes. 8 Q. Why do you expect it to change? 9 A. Once he get the tutelage. 10 Q. Then you think he would be appropriate? 11 A. I think he would be appropriate for it, 12 yes, I do. 13 MR. MALONEY: Okay. Hold on just a 14 minute. 15 (Discussion off the record.) 16 MR. MALONEY: All right. That's all I 17 have. Thank you. 18 MR. MARKS: Can we take a five-minute 19 break? 20 THE VIDEOGRAPHER: We're going off the 21 record. The time is 2:15 p.m. 22 (Recess.)</p>

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1 THE VIDEOGRAPHER: Back on the record.
 2 The time is 2:23 p.m.
 3 EXAMINATION BY COUNSEL FOR
 4 PLAINTIFF/COUNTER-DEFENDANT/THIRD-PARTY DEFENDANTS
 5 BY MR. MARKS:
 6 Q. Ms. Williams, let me ask you -- you were
 7 asked a question by counsel before the break, and you
 8 stated that you didn't know if Joel was ever on the
 9 board, and he said that that -- and counsel stated
 10 that that was not your earlier testimony.
 11 Why do you say -- why did you say that
 12 Joel Peebles was not on the board versus your earlier
 13 testimony this morning?
 14 A. Well, the apostle had said that he
 15 wasn't on the board many times.
 16 Q. She told you that personally?
 17 A. Personally, yes. I've -- I've been with
 18 the apostle, working with her, since 1987, and we have
 19 done a lot of talking. But the past few years is when
 20 she had issues, and she would discuss them.
 21 Q. She would have issues regarding Joel
 22 Peebles?

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1 A. Yes.
 2 Q. What sort of issues did she have?
 3 A. I didn't go into her with the issues. I
 4 just listened to her talk.
 5 Q. What sort of things did she say
 6 regarding Joel Peebles?
 7 A. I don't remember.
 8 Q. Did she ever --
 9 A. Excuse me, one of them was this thing
 10 with the school.
 11 Q. Jericho Christian Academy?
 12 A. Yes.
 13 Q. And what was her thing with that, with
 14 the school?
 15 A. I'd rather not say, because I'm
 16 assuming.
 17 Q. I don't want you to assume.
 18 A. Uh-huh.
 19 Q. I just want you to testify as to what
 20 you know or what you were told.
 21 Let me ask you -- let me refer you to
 22 tab 40.

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1 That was your affidavit?
 2 A. Yes.
 3 Q. And where you refer in paragraph 2, "In
 4 March 2009, the surviving members of the original
 5 board of trustees and I elected Pastor Betty P.
 6 Peebles, Gloria McClam-Magruder, Denise Killen,
 7 Clarence Jackson, and me as current successor members
 8 of the board of trustees pursuant to Resolution 1-09,
 9 which is attached as Exhibit 1," take a look at that
 10 resolution, that exhibit.
 11 It's the third page. And, actually, if
 12 you look at the fourth page on the -- page 2 of 2
 13 where it has Board of Trustees.
 14 A. Uh-huh.
 15 Q. And it has Pastor Betty P. Peebles and
 16 her signature?
 17 A. Yes.
 18 Q. Elder William A. Meadows and his
 19 signature?
 20 A. Yes.
 21 Q. Deacon Anne F. Wesley and her signature?
 22 A. Yes.

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1 Q. And your signature?
 2 A. Yes.
 3 Q. And are those the four individuals who
 4 you're referring to in your affidavit as the original
 5 board of trustees?
 6 A. Yes.
 7 Q. Now, fold that page over. We're going
 8 to come back to that.
 9 Let me refer you to tab 3, the Statement
 10 of Election to Accept of Jericho Baptist Church. On
 11 page 2 where the names of Pastor Betty P. Peebles,
 12 Assistant Pastor James R. Peebles, Jr., Elder
 13 William A. Meadows, Minister Lucy T. Lane, Deacon Anne
 14 Wesley, and Deacon Dorothy L. Williams -- which is
 15 you, correct?
 16 A. Yes.
 17 Q. -- that these were the trustees of the
 18 church in 1996 --
 19 A. Yes.
 20 Q. -- as of the date of this document,
 21 which was filed October 16, 1996, which is on the
 22 first page?

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1 A. Yes.

2 **Q. Well, look at the first page and follow**

3 **me, if you would, please.**

4 A. 1996, yes.

5 **Q. Now, these -- is it your testimony that**

6 **these were the trustees of the church in 1996?**

7 A. Yes.

8 **Q. Earlier when asked by Mr. Maloney if you**

9 **had seen this document, you indicated that you had not**

10 **seen this document, tab 3, before.**

11 **Was that a correct statement?**

12 A. No, it wasn't.

13 **Q. And is your testimony that you had seen**

14 **this document before?**

15 A. Yes, I have seen it before.

16 **Q. Okay. And is it your testimony that**

17 **tab 3, which is the Statement of Election to Accept**

18 **for Jericho Baptist Church, which -- was that used in**

19 **the preparation of your affidavit, which is tab 40?**

20 A. Yes.

21 **Q. And that Statement of Election, which is**

22 **tab 3, is that what you relied on when you stated**

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1 **that -- in paragraph number 3 of your affidavit that**

2 **William Meadows and Anne Wesley were not elected as**

3 **successor members of the board of trustees in**

4 **Resolution 1-09?**

5 A. Yes.

6 **Q. Let's go back to tab 3, if you would for**

7 **a moment, the second page, the signature page.**

8 **On March 15, 2009, the date of**

9 **Resolution 1-09 that elected the successor trustees,**

10 **was Assistant Pastor James R. Peebles, Jr. alive?**

11 A. Could you repeat the question?

12 **Q. On March 15, 2009 --**

13 MR. MALONEY: We'll stipulate he was

14 deceased.

15 MR. MARKS: Thank you, Counsel.

16 Will you also stipulate as to Minister

17 Lucy T. Lane?

18 MR. MALONEY: Was she deceased?

19 MR. PEEBLES: Yes.

20 MR. MALONEY: Yes, we'll stipulate as to

21 that.

22 BY MR. MARKS:

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1 **Q. So looking at those names on the second**

2 **page of tab 3, as of March 15, 2009, the only trustees**

3 **who were then alive in 2009 were Pastor Betty P.**

4 **Peebles?**

5 A. Uh-huh.

6 **Q. I'm sorry, you have to say yes or no.**

7 A. Yes.

8 **Q. Elder William A. Meadows?**

9 A. Yes.

10 **Q. Deacon Anne Wesley?**

11 A. Yes.

12 **Q. And yourself?**

13 A. Yes.

14 **Q. And those are the same four individuals**

15 **that signed Resolution 1-09, which is the exhibit to**

16 **tab 40 --**

17 A. Yes.

18 **Q. -- your affidavit?**

19 A. Yes.

20 **Q. And is it your testimony that these were**

21 **the four original trustees who elected the successor**

22 **trustees?**

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1 A. Yes.

2 **Q. And that is based on Resolution 1-09,**

3 **which is tab 40?**

4 A. Yes.

5 **Q. And was Joel Peebles -- let me rephrase**

6 **that.**

7 **Joel Peebles was not included on the**

8 **1996 Statement of Election to Accept of Jericho**

9 **Baptist Church, was he?**

10 A. No.

11 **Q. Have you ever seen any document that**

12 **says Joel Peebles was elected to the board of**

13 **trustees?**

14 A. No, I haven't.

15 **Q. Now, let me ask you, because I want to**

16 **be clear here. When Mr. Maloney asked you had you**

17 **seen the 1996 document earlier, why did you tell him**

18 **you had not seen that document when you actually used**

19 **it to prepare your affidavit?**

20 A. I didn't remember it at the time.

21 **Q. And did you recall it after you looked**

22 **at your affidavit? I'm sorry, did you recall the 1996**

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1 **document after you looked at your affidavit?**
 2 A. I recalled the 1996 document before
 3 then. When I went to lunch, it came to my remembrance
 4 that the 1996 document I had seen.
 5 **Q. Let me also -- let me also refer you to**
 6 **tab 7, which was the Certification of Organizational**
 7 **Documents and Adoption of Resolution, dated**
 8 **December 13, 1998, that listed Reverend Joel R.**
 9 **Peebles, Sr. as a trustee.**
 10 **Mr. Maloney asked you if Joel R. Peebles**
 11 **was a trustee, and your testimony was according to**
 12 **this document; is that correct?**
 13 A. That's correct.
 14 **Q. Okay. So let me ask you, are you saying**
 15 **Joel R. Peebles was a trustee, or are you saying he**
 16 **was a trustee only according to this document?**
 17 A. Well, only according to this document.
 18 **Q. If you had not seen this document, would**
 19 **it have been your opinion in 1998 that Joel R. Peebles**
 20 **was a trustee of the church?**
 21 A. No.
 22 **Q. And is that your same opinion if you**

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1 **look at tab 8? It's also titled Certification of**
 2 **Organizational Documents and Adoption of Resolution**
 3 **where Joel R. Peebles, Sr. is listed as a trustee. Is**
 4 **it based on your knowledge that he was a trustee, or**
 5 **are you saying he's only listed as a trustee?**
 6 A. He's listed as a trustee.
 7 **Q. You had no independent knowledge that --**
 8 **let me answer my question -- ask my question.**
 9 **You had no independent knowledge that he**
 10 **was a trustee as of January 27, 2000?**
 11 A. No, I didn't.
 12 **Q. Let me refer you to tab 9, which is the**
 13 **2000 Two-Year Report for Non-Profit Foreign and**
 14 **Domestic Corporations.**
 15 **Do you see that John R. Peebles, Sr. is**
 16 **listed as a director, correct?**
 17 A. Yes.
 18 **Q. Do you see Clarence Jackson is listed as**
 19 **a director?**
 20 A. Yes.
 21 **Q. And you see Joel R. Peebles is listed as**
 22 **a vice president?**

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1 A. Yes.
 2 **Q. So as of January 15, 2000, Joel R.**
 3 **Peebles is not listed as a trustee of the**
 4 **corporation -- of the church, is he?**
 5 A. No.
 6 **Q. Was Clarence Jackson a trustee of the**
 7 **church, to your knowledge, as of January 15, 2000?**
 8 A. Not to my knowledge.
 9 **Q. Do you have any knowledge why his name**
 10 **is listed there as a director of the church?**
 11 A. According to Pastor -- the apostle,
 12 whenever she needed a name, she would pull people in
 13 to sign. The person that she trusted and that was
 14 there, she pulled them in to sign. That's what she
 15 did.
 16 **Q. Or to have their name listed?**
 17 A. She would have their name list- -- to
 18 have their name listed, yeah.
 19 **Q. I'd ask you to look at tab 11,**
 20 **January 15, 2002, Two-Year Report for Non-Profit**
 21 **Foreign and Domestic Corporations for the District of**
 22 **Columbia.**

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1 A. Uh-huh.
 2 **Q. Do you see if you compare the -- compare**
 3 **tab 10 -- I'm sorry, tab 9 and tab 11, you'll see in**
 4 **tab 9 Joel Peebles is not listed as a director,**
 5 **correct?**
 6 A. Yes.
 7 **Q. And under tab 11, 2002, you'll see he is**
 8 **listed as a director.**
 9 **Do you see that?**
 10 A. Yes, yes.
 11 **Q. Do you have any independent knowledge of**
 12 **any time between 2002 that Joel Peebles either ceased**
 13 **being a trustee or became a trustee?**
 14 A. No, I don't.
 15 **Q. Do you see for 2002 under tab 11**
 16 **Clarence Jackson is again listed as a director?**
 17 A. Yes.
 18 **Q. Do you have any independent knowledge of**
 19 **whether or not Clarence Jackson was actually a**
 20 **director of the church in 2002?**
 21 A. No, I don't.
 22 **Q. I'll refer you to tab 12, which is a**

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1 **Corporate Resolution to Borrow, and you'll see that --**
2 **you were asked about the Reverend Joel R. Peebles, Sr.**
3 **listed as a trustee here, along with yourself, Anne**
4 **Wesley, Elder William A. Meadows, and Apostle Betty P.**
5 **Peebles.**
6 **Is it your understanding that Joel**
7 **Peebles was a trustee -- I'm sorry, let me strike**
8 **that.**
9 **Do you have any independent knowledge**
10 **that Joel Peebles was a trustee of the church as of**
11 **September 9, 2002?**
12 A. No, I don't.
13 **Q. Do you have any independent knowledge**
14 **that Joel R. Peebles was ever elected as the trustee**
15 **of the church?**
16 A. No, I don't.
17 **Q. And is it your testimony that it is only**
18 **this document that lists Joel R. Peebles as a trustee?**
19 A. Yes.
20 **Q. Did you prepare this document?**
21 A. No.
22 **Q. Do you know who prepared the document?**

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1 A. No.
2 **Q. Do you have any independent knowledge**
3 **whether or not this document is accurate or**
4 **inaccurate?**
5 A. No, I don't.
6 **Q. Did you review this document or read**
7 **this document before you signed it? Well, let me back**
8 **up.**
9 **Who asked you to sign this document?**
10 A. The apostle.
11 **Q. Did you read it before you signed it?**
12 A. No, I didn't.
13 **Q. Let me refer you to tab 14, which is the**
14 **January 15, 2006 District of Columbia Two-Year Report**
15 **for Non-Profit Foreign and Domestic Corporations.**
16 **You do see the name Joel R. Peebles, Sr.**
17 **listed as the director?**
18 A. Yes.
19 **Q. And you're listed as the treasurer?**
20 A. Yes.
21 **Q. Do you have any independent knowledge**
22 **that Joel R. Peebles had ever been elected to the**

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1 **board of trustees of the church prior to January 15,**
2 **2006?**
3 A. No, I don't have any independent
4 knowledge.
5 **Q. Let me refer you to tab 17. That is a**
6 **Unanimous Consent of Directors in Lieu of Meeting, and**
7 **you see your name is listed there, your signature,**
8 **along with Joel R. Peebles?**
9 A. Yes.
10 **Q. Do you have any independent knowledge if**
11 **Joel R. Peebles had ever been elected to the board of**
12 **trustees as of October 31, 2007?**
13 A. No, I don't.
14 **Q. Let me refer you to tab 18, which is the**
15 **2008 Two-Year Report for Non-Profit Foreign and**
16 **Domestic Corporations for the District of Columbia.**
17 **Do you see that Joel R. Peebles was**
18 **listed as a director?**
19 A. Yes, I do.
20 **Q. And you were listed as treasurer?**
21 A. Yes, I do.
22 **Q. Did you have any independent knowledge**

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1 **of Joel R. Peebles being elected as a trustee as of**
2 **January 15, 2008?**
3 A. No, I don't.
4 **Q. How long have you worked with -- or how**
5 **long did you work with the apostle prior to her**
6 **passing regarding the finances of the church?**
7 A. From 1987 until she passed.
8 **Q. And under tab 3, the 1996 District of**
9 **Columbia Statement of Election, you're listed as the**
10 **treasurer; is that correct?**
11 A. Yes.
12 **Q. And from the time you started working**
13 **with -- I'm sorry, strike that.**
14 **From at least 1996 until the date Pastor**
15 **passed, October 2010, are there any other areas other**
16 **than finance that you worked with the pastor?**
17 A. Yes.
18 **Q. What other areas?**
19 A. I worked with her on preparing messages.
20 I worked on the screens.
21 **Q. Screens?**
22 A. Yes.

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1 **Q. What sort of screens?**
 2 A. Presentation that we do at the church.
 3 I've worked on security. I've worked in
 4 the upper room.
 5 **Q. What's the upper room?**
 6 A. Prayer room, prayer and counseling.
 7 I've done so many things at that church.
 8 **Q. So you worked very closely with Pastor**
 9 **Peebles?**
 10 A. Yes, I did. I even worked for her --
 11 when her husband got sick, I cooked food for him.
 12 **Q. Was this at her home?**
 13 A. At her home.
 14 I've even cooked for the pastor at her
 15 home.
 16 **Q. Aside from the Jericho Christian**
 17 **Academy, have you ever known Joel Peebles to have any**
 18 **responsibilities or duties regarding the operation of**
 19 **the church?**
 20 A. No, I haven't.
 21 **Q. Have you ever known him to meet with**
 22 **Pastor and you to discuss church finances?**

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1 A. No, I haven't.
 2 **Q. Now, you were asked about the numbers of**
 3 **the Sunday collection, the amount of the collection.**
 4 **Are those numbers that you commit to**
 5 **memory?**
 6 A. No, I don't.
 7 **Q. Do you have them written down anywhere?**
 8 A. Yes, I do.
 9 **Q. So if you needed to access the numbers,**
 10 **you could do so?**
 11 A. Easily.
 12 **Q. You were also asked about the amount of**
 13 **the salary of Denise Killen.**
 14 **Do you have her salary -- the amount of**
 15 **her salary committed to memory?**
 16 A. No, I don't.
 17 **Q. Do you have it written down somewhere?**
 18 A. Yes, I do.
 19 **Q. And could you access the amount if you**
 20 **needed to?**
 21 A. Yes, I can.
 22 **Q. You were asked your opinion as to why**

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1 **the collections -- the weekly collections have fallen**
 2 **at the church, and you testified that, in your**
 3 **opinion, it was due, in part, to tables around the**
 4 **church collecting money.**
 5 **Would you explain that? What are you**
 6 **referring to when you talk about tables being around**
 7 **the church collecting money?**
 8 A. Tables -- when I say tables around the
 9 church collecting money, whatever they have people
 10 doing -- I know one thing is they're collecting money
 11 for Boys Town and Project Hope.
 12 **Q. Project what?**
 13 A. Project Hope.
 14 **Q. What is Boys Town?**
 15 A. I don't know.
 16 **Q. What is Project Hope?**
 17 A. I don't know.
 18 **Q. And when you say --**
 19 A. It's not a church function.
 20 **Q. When you say "they" -- who are you**
 21 **referring to when you say "they"?**
 22 A. Elder Joel.

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1 **Q. And why do you say Elder Joel has these**
 2 **tables around the church collecting money?**
 3 A. Because he's the one in charge right now
 4 for himself to do that. He's not listening to the
 5 board and working with the board on things to better
 6 the church.
 7 **Q. Have you personally heard Elder Joel**
 8 **make an appeal to the congregation about collecting**
 9 **moneys for Boys Town and Project Hope?**
 10 A. Yes, I have.
 11 **Q. And was this a church service or where?**
 12 A. In the church service, at the end of the
 13 service.
 14 **Q. And would that be from the pulpit?**
 15 A. Yes.
 16 **Q. And how do you know these -- these**
 17 **tables that are collecting moneys are for Boys Town**
 18 **and Project Hope?**
 19 A. Because I heard them direct the people
 20 to the tables that -- you know, go out in the lobby
 21 and register.
 22 **Q. And who did you hear direct members of**

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1 **the congregation to those tables?**
 2 A. I've heard Pastor Joel and Ylawnda.
 3 **Q. Ylawnda Peebles?**
 4 A. Yes.
 5 **Q. Have you ever asked about -- asked**
 6 **anyone about turning that money in to the church?**
 7 A. No, I haven't.
 8 **Q. And why not?**
 9 A. I just haven't.
 10 **Q. Now, this morning you were asked if you**
 11 **had worked as treasurer at the church in 1996, and**
 12 **your answer, I believe, was that you weren't sure.**
 13 **Why did you answer that way?**
 14 A. I'm not sure. I don't -- I don't know,
 15 because -- I don't know.
 16 **Q. Well, when --**
 17 A. This morning, I was a little -- a little
 18 lethargic, I guess, because of lack of food and drink.
 19 I don't know.
 20 **Q. And you were able to eat lunch?**
 21 A. Yes.
 22 **Q. And you feel energized?**

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1 A. Very much so.
 2 **Q. You were also asked about a meeting of**
 3 **the pastor that the apostle called with you, William**
 4 **Meadows, and Anne Wesley regarding buying -- the**
 5 **purchase of a Bentley and upgrading the college.**
 6 **And when you were asked if you met**
 7 **with -- if these individuals met with the apostle as**
 8 **board members or confidants, you said confidants**
 9 **because all the board members weren't -- other board**
 10 **members weren't there.**
 11 **Do you remember that?**
 12 A. Yes, I do.
 13 **Q. And when was this meeting? I didn't get**
 14 **the year of this meeting.**
 15 A. I don't remember the year of the
 16 meeting.
 17 **Q. Was it after 2000?**
 18 A. Yes.
 19 **Q. Do you remember what year the Bentley**
 20 **was purchased?**
 21 A. No, I don't.
 22 **Q. Okay. Well, if it's after 2000 -- well,**

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1 **do you recall if Minnie Lane -- Lucy lane, I'm sorry,**
 2 **was living at the time Pastor called that meeting?**
 3 A. I don't remember if she was living. I
 4 don't.
 5 **Q. Well, why did you say that they were**
 6 **confidants and not board members?**
 7 A. I don't know.
 8 **Q. Because they were board members, weren't**
 9 **they, or trustees, I'll say?**
 10 MR. MALONEY: Objection. Leading.
 11 BY MR. MARKS:
 12 **Q. Well, were Elder William Meadows and**
 13 **Anne Wesley trustees when the apostle called that**
 14 **meeting regarding the purchase of a Bentley and**
 15 **upgrading the college?**
 16 A. Yes, they were.
 17 **Q. And do you know any other trustees of**
 18 **the board at that time who might not have attended**
 19 **that meeting?**
 20 A. No, I don't.
 21 **Q. Have you ever seen any items being sold**
 22 **at the church for which money was not turned in to be**

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1 **counted?**
 2 A. Not to my knowledge.
 3 **Q. Has there ever been a time where you saw**
 4 **a collection taken at the church that you asked for**
 5 **money -- for the money to be turned in and it was not**
 6 **turned in?**
 7 A. Specifically the Wednesday night money,
 8 I sent someone over to get it, and they said the
 9 person wouldn't give it to them. They gave it to
 10 Elder Joel.
 11 MR. MARKS: No further questions.
 12 MR. MALONEY: I have nothing further.
 13 Thank you very much, ma'am.
 14 THE VIDEOGRAPHER: Here ends today's
 15 deposition. Going off the record at 2:50 p.m.
 16 (Whereupon, the following exchange took
 17 place off the video record:)
 18 THE REPORTER: Do you want a copy of the
 19 transcript?
 20 MR. MARKS: Yes, and we'll read and
 21 sign.
 22 THE REPORTER: Regular delivery?

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1 MR. MARKS: What's regular delivery?
 2 THE REPORTER: Two weeks.
 3 MR. MARKS: Two weeks? Two weeks? Two
 4 weeks? Yeah, that should be fine.
 5 (Thereupon, signature not having been
 6 waived, the taking of the deposition
 7 concluded at 2:50 p.m.)
 8
 9
 10
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 22

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1 ERRATA SHEET
 2 Merrill LAD
 3 7654 Standish Place
 4 Rockville, Maryland 20855
 5 (301) 762-8282
 6 IN THE MATTER OF: JERICO V. PEEBLES
 DEPONENT: DOROTHY LOUISE WILLIAMS
 7
 8 Enclosed is the transcript of your deposition
 9 testimony. Please review the transcript.
 Complete and distribute the signed errata sheet
 9 and acknowledgment page to all parties, including
 this office, within thirty (30) days of any changes.
 10 Do not write on the transcript itself.

11 PAGE LINE CHANGE OR CORRECTION REASON THEREFORE
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 DATE: _____ SIGNATURE _____

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1 CASE: Jericho v. Peebles
 DATE: May 26, 2011
 2
 3 ACKNOWLEDGMENT OF DEPONENT
 4 I, Dorothy Louise Williams, do hereby
 5 acknowledge that I have read and examined pages 7
 6 through 153, inclusive, of the transcript of my
 7 deposition and that:
 8 (Check appropriate box)
 9
 10 The same is a true, correct, and complete
 transcript of the answers given by me to the questions
 11 therein recorded.
 12 Except for the changes noted in the
 attached Errata sheet, the same is a true, correct,
 13 and complete transcription of the answers given by me
 to the questions therein recorded.
 14
 15 Date: _____ Signature: _____
 16
 17
 18
 19
 20
 21
 22

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1 CERTIFICATE OF NOTARY PUBLIC
 2 I, Marney Alena Mederos, the officer before
 3 whom the foregoing deposition was taken, do hereby
 4 certify that the witness whose testimony appears in
 5 the foregoing deposition was duly sworn by me; that
 6 the testimony of said witness was taken by me in
 7 stenotype and thereafter reduced to computerized
 8 transcription under my direction; that said
 9 deposition is a true record of the testimony given by
 10 said witness; that I am neither counsel for, related
 11 to, nor employed by any of the parties to the action
 12 in which this deposition was taken; and, further,
 13 that I am not a relative or employee of any attorney
 14 or counsel employed by the parties hereto, nor
 15 financially or otherwise interested in the outcome of
 16 the action.
 17
 18 Notary Public in and for
 19 the State of Maryland
 20
 21
 22 My Commission Expires:
 November 23, 2012

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