

1                                   IN THE CIRCUIT COURT  
2                                   FOR PRINCE GEORGE'S COUNTY, MARYLAND  
3   - - - - -X  
4   JERICO BAPTIST CHURCH MINISTRIES, :  
5   INC., :  
6        Plaintiff/Counter-Defendant, : Case No.:  
7   vs. : CAL 10-33647  
8   JOEL R. PEEBLES, SR., et al., :  
9        Defendants/Counter-Plaintiffs/ :  
10   Third-Party Plaintiffs, :  
11   vs. :  
12   GLORIA MCCLAM-MAGRUDER, et al., :  
13        Third-Party Defendants. :  
14   - - - - -X

15  
16                                   Videotaped Deposition of CLARENCE JACKSON  
17                                   Greenbelt, Maryland  
18                                   Wednesday, May 25, 2011  
19                                   9:22 a.m.  
20   Job No.    1-199502  
21   Pages:     1 - 334  
22   Reported by: Dana C. Ryan, RPR, CRR

1                                   Videotaped Deposition of CLARENCE JACKSON,  
2   held at the law offices of:  
3  
4                                   Joseph, Greenwald & Laake, P.A.  
5                                   6404 Ivy Lane  
6                                   Suite 400  
7                                   Greenbelt, Maryland 20770  
8                                   (301) 220-2200  
9

10  
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12  
13                                   Pursuant to agreement, before Dana C. Ryan,  
14   Registered Professional Reporter, Certified  
15   Realtime Reporter and Notary Public in and for the  
16   State of Maryland.  
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A P P E A R A N C E S

ON BEHALF OF THE DEFENDANTS, COUNTER-PLAINTIFFS  
AND THIRD-PARTY PLAINTIFFS:

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ON BEHALF OF THE PLAINTIFF, COUNTER-DEFENDANT  
AND THIRD-PARTY DEFENDANTS:

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A P P E A R A N C E S C O N T I N U E D

ALSO PRESENT:

Patrick Ruffner, Videographer  
Joel R. Peebles, Sr.  
William Meadows  
Clifford Boswell  
Gloria McClam-Magruder  
Dorothy Williams  
Denise Killen

20  
21  
22

0005

C O N T E N T S		
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0006

P R O C E E D I N G S	
2	(Jackson Deposition Exhibit Numbers 1
3	and 2 were marked for identification and retained
4	by Counsel.)
09:22:10 5	THE VIDEOGRAPHER: Here begins tape
09:22:14 6	number 1 in today's deposition of Clarence Jackson
09:22:17 7	in the matter of Jericho Baptist Church
09:22:20 8	Ministries, Incorporated, verse (sic)
09:22:23 9	Joel R. Peebles, Sr., et al., verse (sic)
09:22:27 10	Gloria McClam-MaGruder, et al., in the Circuit
09:22:31 11	Court for Prince George's County, Maryland, Case
09:22:35 12	Number CAL 10-33647.
09:22:36 13	Today's date is May 25th, 2011. The
09:22:41 14	time is 9:22 a.m. The videographer is
09:22:45 15	Patrick Ruffner. This deposition is taking place
09:22:48 16	at 6404 Ivy Lane, Greenbelt, Maryland.
09:22:53 17	Counsel, please voice identify

09:22:54 18 yourselves and state whom you represent.  
09:22:57 19 MR. MALONEY: Timothy Maloney for the  
09:23:01 20 defendants.  
09:23:04 21 MR. MARKS: Isaac Marks for the  
09:23:05 22 plaintiffs.

0007

09:23:06 1 THE VIDEOGRAPHER: The court reporter  
09:23:06 2 today is Dana Ryan of Merrill LAD.  
09:23:16 3 Would the reporter please swear in the  
09:23:18 4 witness?  
09:23:18 5 CLARENCE JACKSON,  
09:23:18 6 having been duly sworn, testified as follows:  
09:23:19 7 MR. MARKS: Tim, let me ask you. As a  
09:23:21 8 preliminary matter, I've had marked and I'd like  
09:23:24 9 to enter Jacks -- Jackson Exhibits 1 and 2, 1  
09:23:27 10 being my May 23rd letter to you and Joe Creed  
09:23:34 11 objecting to the use of Livenotes (sic) during the  
09:23:37 12 proceeding; and 2 being Joe Creed's e-mail  
09:23:39 13 response to me saying that Livenotes was not going  
09:23:44 14 to be used.  
09:23:44 15 We understand that Livenotes are  
09:23:44 16 streaming and that there are people who are signed  
09:23:47 17 on to that. We object to that and will not agree  
09:23:48 18 to go forward with the deposition if Livenotes is  
09:23:49 19 streaming.  
09:23:51 20 MR. MALONEY: Well, Livenotes is not  
09:23:54 21 streaming today. We have the right to use  
09:23:56 22 Livenotes. We don't agree with any of your

0008

09:23:59 1 characterizations about what the law is with  
09:24:01 2 respect to Livenotes, and what we do with  
09:24:02 3 Livenotes is our work product here, but  
09:24:05 4 notwithstanding any of that, Livenotes is not  
09:24:10 5 being used today.  
09:24:12 6 MR. MARKS: That's not what I  
09:24:12 7 understand from the videographer.  
09:24:13 8 MR. MALONEY: Is somebody hooked into  
09:24:14 9 Livenotes right now?  
09:24:17 10 THE COURT REPORTER: Uh-huh.  
09:24:17 11 MR. MALONEY: Really?  
09:24:17 12 THE COURT REPORTER: Uh-huh.  
09:24:18 13 MR. MALONEY: Let me go check on that  
09:24:19 14 because --  
09:24:20 15 MR. MARKS: Well, we would ask that it

09:24:20 16 simply be dis- --  
09:24:20 17 MR. MALONEY: Who --  
09:24:20 18 MR. MARKS: -- -connected.  
09:24:21 19 MR. MALONEY: Who has it?  
09:24:24 20 MR. MARKS: The videographer can just  
09:24:29 21 simply disconnect it.  
09:24:32 22 MR. MALONEY: Well -- well, my question

0009

09:24:32 1 is who is connected to Livenotes?  
09:24:32 2 THE COURT REPORTER: Somebody  
09:24:32 3 Higginbotham (phonetics).  
09:24:33 4 MR. MALONEY: Really? Let me go check  
09:24:34 5 on this.  
09:24:35 6 THE VIDEOGRAPHER: Do you want to go  
09:24:35 7 off record or --  
09:24:36 8 MR. MALONEY: I was under the  
09:24:37 9 impression we were not using Livenotes today.  
09:24:39 10 MR. MARKS: Well, we would ask that  
09:24:39 11 the --  
09:24:39 12 MR. MALONEY: Well, let's disconnect it  
09:24:41 13 right now. That's simple enough.  
09:24:43 14 My position is we're more than entitled  
09:24:46 15 to use Livenotes, but to move this process forward  
09:24:49 16 without further delay, we are not going to use it  
09:24:52 17 today, so . . .  
09:24:52 18 MR. MARKS: Very good.  
09:24:52 19 THE VIDEOGRAPHER: Okay.  
09:25:00 20 MR. MALONEY: All right. Are we ready  
09:25:00 21 to go?  
09:25:00 22 You got to reboot?

0010

09:25:00 1 THE COURT REPORTER: Well, I've just  
09:25:00 2 got to set up a new file.  
09:25:01 3 MR. MALONEY: All right. The reporter  
09:25:01 4 asked to go off the record for a second to  
09:25:04 5 restructure her situation here, so go ahead.  
09:25:08 6 THE VIDEOGRAPHER: Going off the  
09:25:08 7 record. The time is 9:24 a.m.  
09:25:09 8 (Recess -- 9:24 a.m.)  
09:25:09 9 (After recess -- 9:26 a.m.)  
09:26:56 10 THE VIDEOGRAPHER: Back on the record.  
09:26:58 11 The time is 9:26 a.m.  
09:26:59 12 EXAMINATION BY COUNSEL FOR THE DEFENDANTS,  
09:26:59 13 COUNTER-PLAINTIFFS AND THIRD-PARTY PLAINTIFFS

09:27:01 14 BY MR. MALONEY:  
09:27:01 15 Q Okay. Would you tell us your full name  
09:27:03 16 and your business address?  
09:27:06 17 A Clarence Jackson.  
09:27:08 18 Q And what is your address?  
09:27:09 19 A 2502 Fort Drive, Suitland, Maryland.  
09:27:14 20 Q And how long have you lived at that  
09:27:16 21 address?  
09:27:17 22 A Since 19 -- 1975.

0011

09:27:19 1 Q And who do you live there with?  
09:27:21 2 A Myself.  
09:27:21 3 Q Are you married?  
09:27:22 4 A Divorced.  
09:27:23 5 Q And when were you divorced?  
09:27:25 6 A In 1992.  
09:27:27 7 Q Have you ever had your deposition taken  
09:27:29 8 before?  
09:27:30 9 A Yep.  
09:27:30 10 Q When and under what circumstances?  
09:27:33 11 A I had a couple of them taken probably  
09:27:41 12 in 1980, 1974, for a murder trial, one for the  
09:28:00 13 F.B.I., for a witness.  
09:28:06 14 Q Any others that you can think of?  
09:28:10 15 A Car accident.  
09:28:15 16 Q All right. Let's break these down.  
09:28:17 17 Any others?  
09:28:17 18 A That's it.  
09:28:18 19 Q All right. The F.B.I. matter, what was  
09:28:21 20 that?  
09:28:22 21 A That was also a -- a murder -- no, that  
09:28:26 22 was a -- yeah, that was a murder.

0012

09:28:30 1 Q This was an F.B.I. investigation into a  
09:28:33 2 murder?  
09:28:34 3 A Yep.  
09:28:35 4 Q And what was your role in that?  
09:28:36 5 A Well, they -- I was on duty at the time  
09:28:41 6 in security.  
09:28:42 7 Q Uh-huh. So you were a witness?  
09:28:45 8 A Yeah.  
09:28:45 9 Q Okay. Was there another murder as well  
09:28:48 10 that did not involve the F.B.I.?  
09:28:50 11 A There was a murder that the guy came

09:28:51 12 into the building and I witnessed him, you know,  
09:28:54 13 connected to the murder.  
09:28:56 14 Q And you witnessed that as well?  
09:28:57 15 A Yep.  
09:28:58 16 Q And the car accident case, what was  
09:29:00 17 your role in that?  
09:29:02 18 A I was injured.  
09:29:04 19 Q Uh-huh. And so you filed a lawsuit?  
09:29:07 20 A Yep.  
09:29:08 21 Q And when was that?  
09:29:12 22 A Oh, I would say in 19 -- 1960.

0013

09:29:16 1 Q 1960?  
09:29:17 2 A (Witness nods head.)  
09:29:18 3 Q Okay. And you were deposed then.  
09:29:19 4 And how about the matter in 1974; what  
09:29:23 5 was that?  
09:29:25 6 A Them's the only ones that -- what I've  
09:29:25 7 given you.  
09:29:29 8 Q So, in other words --  
09:29:29 9 THE COURT REPORTER: I didn't hear you.  
09:29:29 10 What did you say?  
09:29:29 11 THE WITNESS: Those the only three that  
09:29:30 12 I can recall.  
09:29:31 13 BY MR. MALONEY:  
09:29:31 14 Q All right. So, in other words, you  
09:29:32 15 recall a car accident, a murder involving the  
09:29:35 16 F.B.I., and a murder not involving the F.B.I.?  
09:29:39 17 A Right. That's correct.  
09:29:40 18 Q All right. So you understand from your  
09:29:42 19 deposition experience that I'm going to ask you a  
09:29:44 20 series of questions today, and you'll be asked to  
09:29:46 21 respond under oath.  
09:29:47 22 If at any time you don't understand the

0014

09:29:49 1 questions, just say so and I'll be glad to  
09:29:52 2 rephrase the questions for you. Okay?  
09:29:53 3 A Sure.  
09:29:54 4 Q What is your date of birth?  
09:29:55 5 A 6/21/44.  
09:29:57 6 Q All right. Tell me a little bit about  
09:30:02 7 your educational background.  
09:30:03 8 A I graduated from high school.  
09:30:04 9 Q Uh-huh.

09:30:06 10 A As a printer.  
09:30:13 11 Q And which high school did you attend?  
09:30:16 12 A Phelps Vocational High.  
09:30:22 13 Q The Vocats?  
09:30:23 14 A Phelps Vocational.  
09:30:24 15 Q Phelp?  
09:30:25 16 A Phelps.  
09:30:26 17 Q Phelps. Phelps?  
09:30:27 18 A Uh-huh.  
09:30:27 19 Q Right. And what year did you graduate  
09:30:28 20 from Phelps?  
09:30:29 21 A 1963.  
09:30:30 22 Q Okay. What -- and what did you do

0015

09:30:31 1 after graduating from Phelps?  
09:30:33 2 A I worked in an automobile as a parts  
09:30:38 3 clerk.  
09:30:38 4 Q Uh-huh. Where was that?  
09:30:42 5 A In Washington, D.C.  
09:30:44 6 Q Have you ever attended divinity school  
09:30:46 7 or had any sort of religious or divinity training?  
09:30:50 8 A No more than at Jericho --  
09:30:53 9 Q And what --  
09:30:53 10 A -- training there.  
09:30:54 11 Q Only what you've had at Jericho; is  
09:30:55 12 that correct?  
09:30:56 13 A Yep.  
09:30:56 14 Q And what have you had at Jericho?  
09:30:59 15 A I had the training from the beginning  
09:31:02 16 of the bible study.  
09:31:06 17 Q So, in other words, you've done some  
09:31:07 18 bible study at Jericho?  
09:31:09 19 A (Witness nods head.)  
09:31:09 20 Q Other than the bible study at Jericho,  
09:31:12 21 have you had any divinity training?  
09:31:14 22 A No.

0016

09:31:15 1 Q Okay. So after graduating from Phelps,  
09:31:18 2 you worked as a parts clerk. Was this for an  
09:31:21 3 automobile dealership or --  
09:31:22 4 A Dealership.  
09:31:24 5 Q Which dealership was that?  
09:31:25 6 A Mid-City Volkswagen.  
09:31:29 7 Q Uh-huh. And how long did you work



09:31:30 8 there?  
09:31:31 9 A Oh, I worked there to about -- from  
09:31:34 10 1977.  
09:31:36 11 Q Until when -- until '77?  
09:31:39 12 A '77.  
09:31:40 13 Q Okay. And why did you leave there?  
09:31:42 14 A Well, I left there to be a security --  
09:31:46 15 work in security.  
09:31:47 16 Q Okay.  
09:31:48 17 A Then I went back to the Volkswagen  
09:31:52 18 dealership.  
09:31:53 19 Q What year did you go back to them?  
09:31:55 20 A Same year.  
09:31:56 21 Q Okay. So you briefly worked in  
09:31:58 22 security in '77?

0017

09:31:59 1 A '77. I kept both jobs.  
09:32:01 2 Q Uh-huh. And who was that that you  
09:32:04 3 worked for in security then?  
09:32:06 4 A Jonathan Woodner Company in Washington,  
09:32:09 5 D.C.  
09:32:10 6 Q Can you spell the last name for our  
09:32:11 7 reporter?  
09:32:12 8 A Woodner, W-O-O-D-N-E-R.  
09:32:16 9 Q And what did you do for them as far as  
09:32:18 10 security? Where did you work and what was your  
09:32:20 11 duties?  
09:32:20 12 A My duty was I was security officer and  
09:32:22 13 just maintain security of the complex.  
09:32:26 14 Q And what complex was that?  
09:32:30 15 A The Woodner Apartments.  
09:32:33 16 Q Uh-huh. And why did you leave there?  
09:32:34 17 A I stayed there for a good little while.  
09:32:36 18 Q About how long?  
09:32:37 19 A Till 1990, 'cause I worked my way up to  
09:32:41 20 assistant general manager.  
09:32:43 21 Q Of the security division?  
09:32:47 22 A No.

0018

09:32:47 1 Q Of -- of the whole --  
09:32:48 2 A Of the whole --  
09:32:48 3 Q -- outfit?  
09:32:49 4 A -- of the complex.  
09:32:50 5 Q And what did those responsibilities

09:32:51 6 entail?  
09:32:51 7 A My responsibility, I was at -- at  
09:32:54 8 night, night manager.  
09:32:56 9 Q Uh-huh.  
09:32:56 10 A Responsibility was maintain the -- you  
09:32:59 11 know, the manager of the place, make sure  
09:33:02 12 everything that complains -- people complain about  
09:33:06 13 anything in security.  
09:33:06 14 Q Where was that apartment complex  
09:33:08 15 located?  
09:33:08 16 A 16 -- 3636 16th Street, Northwest,  
09:33:12 17 Washington, D.C.  
09:33:13 18 Q Uh-huh. Now, were you working for the  
09:33:15 19 Volkswagen dealership at the same time?  
09:33:17 20 A Well, after a while, I -- I left  
09:33:19 21 Volkswagen and went there full-time.  
09:33:22 22 Q When did you leave Volkswagen?

0019

09:33:25 1 A I want to say in '78.  
09:33:29 2 Q Uh-huh. All right. So you worked at  
09:33:32 3 the apartment complex all the way up to about  
09:33:34 4 1990; is that correct?  
09:33:37 5 A Yeah.  
09:33:37 6 Q And why did you leave there --  
09:33:40 7 A But --  
09:33:41 8 Q Go ahead.  
09:33:42 9 A But let me make a correction.  
09:33:44 10 Q Sure.  
09:33:44 11 A I also in -- in -- while I was working  
09:33:48 12 at the -- the Woodner Apartment, I also worked --  
09:33:55 13 I continued to work part-time at the Woodner  
09:33:57 14 Apartment. Then I went to correction in Upper  
09:34:00 15 Marlboro in 1980.  
09:34:03 16 Q Prince George's County Department of  
09:34:05 17 Corrections?  
09:34:06 18 A Department of Correction.  
09:34:07 19 Q Did you work there with Mr. Saxton --  
09:34:09 20 A Saxton --  
09:34:12 21 Q -- and Mr. --  
09:34:12 22 A -- Gaston (phonetics) --

0020

09:34:12 1 Q -- Gaston --  
09:34:12 2 THE COURT REPORTER: Wait, wait, wait.  
09:34:13 3 BY MR. MALONEY:

09:34:13 4 Q Let me finish the question. When  
09:34:15 5 Mr. Arnett W. Gaston and Sam Saxton were there,  
09:34:18 6 did you work there?  
09:34:20 7 A Yes.  
09:34:20 8 Q And what were your duties there then?  
09:34:21 9 A I was a correction officer.  
09:34:22 10 Q And for what years were you a  
09:34:24 11 correctional officer?  
09:34:25 12 A From 1980 to 1985.  
09:34:26 13 Q Uh-huh. And why did you stop being a  
09:34:27 14 correctional officer?  
09:34:28 15 A Well, the -- Jonathan Woodner, the  
09:34:32 16 owner, asked me to come back --  
09:34:34 17 Q Uh-huh.  
09:34:34 18 A -- and that he want me to come back as  
09:34:36 19 full-time and, you know, and offered me a job as  
09:34:39 20 assistant general manager at night.  
09:34:41 21 Q Okay. All right. And you held that  
09:34:43 22 assistant general manager position until 1990; is

0021

09:34:47 1 that --  
09:34:48 2 A 1990.  
09:34:49 3 Q -- correct?  
09:34:50 4 All right. And why did you leave that  
09:34:52 5 position?  
09:34:52 6 A Jona -- the owner had passed away.  
09:34:55 7 Q Uh-huh.  
09:34:56 8 A And I got another job down at Harbor  
09:35:01 9 Square as assistant manager down on the  
09:35:04 10 waterfront, guarding some apartments.  
09:35:07 11 Q And at Harbor Square, what were your  
09:35:10 12 duties as assistant manager?  
09:35:11 13 A Same thing. Assistant general manager,  
09:35:18 14 maintain the complex.  
09:35:18 15 Q And how long did you work at Harbor  
09:35:19 16 Square?  
09:35:19 17 A Until 1998.  
09:35:20 18 Q Uh-huh. And what did you do after  
09:35:21 19 that?  
09:35:22 20 A I came -- and the apostle asked me to  
09:35:27 21 come full-time at Jericho.  
09:35:29 22 Q And so you began working full-time at

0022

09:35:30 1 Jericho in 1998?

09:35:32 2 A Yep.  
09:35:32 3 Q And what was the position that you --  
09:35:34 4 A Position that was was facility manager.  
09:35:37 5 Q Uh-huh. And how much were you paid as  
09:35:39 6 facility manager at that time?  
09:35:41 7 A 35,000.  
09:35:42 8 Q Uh-huh. Did you have any other duties  
09:35:44 9 other than being facility manager?  
09:35:47 10 A Pretty much I had to, you know,  
09:35:51 11 director of security part of that and I had the  
09:35:55 12 bus ministry.  
09:35:56 13 Q Did you have any responsibility for the  
09:35:59 14 transportation or driving of the apostle?  
09:36:02 15 A Yes.  
09:36:02 16 Q Tell me about that.  
09:36:04 17 A Well, I would pick her up for church,  
09:36:12 18 follow her home at -- at night. If she go out of  
09:36:16 19 town, which was very few, then I would -- I would  
09:36:18 20 drive her around.  
09:36:20 21 Q Did the apostle ever drive herself?  
09:36:24 22 A Yes.

0023

09:36:24 1 Q All right. But when she had a driver,  
09:36:26 2 were you generally the person who was the driver?  
09:36:29 3 A Most of the time, yes.  
09:36:30 4 Q And how often was that?  
09:36:31 5 A Quite frequently.  
09:36:33 6 Q Is it a fair statement that you usually  
09:36:34 7 drove her as opposed to her driving herself?  
09:36:40 8 MR. MARKS: What time period are we  
09:36:41 9 talking about?  
09:36:43 10 MR. MALONEY: When he started working  
09:36:43 11 there. From when he started working there.  
09:36:46 12 THE WITNESS: Well, she would come in  
09:36:47 13 in the evening and when she comes to work --  
09:36:49 14 BY MR. MALONEY:  
09:36:51 15 Q Uh-huh.  
09:36:51 16 A -- but I mostly would drive her around  
09:36:54 17 on Sundays to come to church.  
09:36:57 18 Q And what vehicle would you use for  
09:36:58 19 that?  
09:36:58 20 A Her own vehicle.  
09:36:59 21 Q And what vehicle was that that you --  
09:37:02 22 A Her Mercedes or -- she had two cars --

09:37:04 1 she had a -- she had a Mercedes and then the  
09:37:07 2 church had a Rolls Royce at that time.  
09:37:10 3 Q Uh-huh. After going to work for  
09:37:12 4 Jericho, did there come a time that either your  
09:37:14 5 duties increased or your salary increased?  
09:37:17 6 A Well, my duty increased a lot, you  
09:37:20 7 know, when we purchased -- when we got the  
09:37:22 8 warehouses and we got additional land increase.  
09:37:29 9 Q And how did your duties increase when  
09:37:31 10 you got the warehouses and the additional  
09:37:33 11 property?  
09:37:33 12 A Well, we had to maintain the -- the  
09:37:35 13 complex.  
09:37:37 14 Q Uh-huh. And what were your  
09:37:44 15 responsibilities with respect to maintaining the  
09:37:50 16 complex?  
09:37:50 17 A Well, it had been complaints about down  
09:37:51 18 there at the warehouse --  
09:37:52 19 Q Uh-huh.  
09:37:52 20 A -- you know.  
09:37:53 21 Q Uh-huh.  
09:37:52 22 A You know, I would have to send the

09:37:54 1 maintenance man down there to --  
09:37:57 2 Q Uh-huh.  
09:37:57 3 A -- to fill the complaints.  
09:37:58 4 Q Uh-huh. What are your -- are you a  
09:37:59 5 full-time employee of Jericho today?  
09:38:02 6 A Yes.  
09:38:02 7 Q And what is your title and  
09:38:04 8 responsibilities today?  
09:38:05 9 A Facility manager.  
09:38:06 10 Q And how much do you earn?  
09:38:08 11 A 91,000.  
09:38:10 12 Q In addition to the 91,000 that you earn  
09:38:13 13 as facility manager, do you receive any other form  
09:38:16 14 of salary, benefits, compensation or reimbursement  
09:38:21 15 from Jericho or any Jericho-related institution?  
09:38:26 16 Do you understand the question?  
09:38:27 17 A Yeah, repeat your question.  
09:38:28 18 Q Sure. Do -- in addition to the \$91,000  
09:38:31 19 salary that you get, do you get anything else of  
09:38:33 20 value, any other salary, benefit, fringe benefit,  
09:38:38 21 reimbursement, payments, stipend or anything else

09:38:42 22 from any other -- from Jericho or any other entity

0026

09:38:46 1 connected with Jericho?

09:38:47 2 A Well, the warehouse, I do the snow  
09:38:50 3 removal.

09:38:51 4 Q Uh-huh. And you get paid for that?

09:38:53 5 A I get paid for that.

09:38:54 6 Q And -- and what is --

09:38:56 7 A As a contractor, separate contractor.

09:38:58 8 Q So you have a separate snow removal

09:39:01 9 contract?

09:39:02 10 A Right.

09:39:02 11 Q Do you have a company established

09:39:03 12 for --

09:39:03 13 A Yeah.

09:39:04 14 Q And what's the name of that company?

09:39:05 15 A C.J.

09:39:06 16 Q Is that C.J., Incorporated?

09:39:08 17 A Yep.

09:39:08 18 Q And is that a Maryland corporation?

09:39:10 19 A Yep.

09:39:11 20 Q And how much does C.J., Incorporated,

09:39:12 21 get for the snow removal?

09:39:14 22 A Well, it depends on the -- you know, on

0027

09:39:15 1 the snow, how hard it snows.

09:39:18 2 Q Right. Well, how does the contract  
09:39:19 3 work?

09:39:20 4 A Contract worked at -- if -- if it's  
09:39:23 5 like a 2, 3 inches -- 2 inches, then, you know,  
09:39:27 6 it's about a hundred dollars --

09:39:29 7 Q Uh-huh.

09:39:29 8 A -- a hundred dollars an hour to remove  
09:39:32 9 the snow.

09:39:33 10 Q And for a typical year such as last  
09:39:35 11 year, how much did you get in terms of snow  
09:39:38 12 removal?

09:39:39 13 A 4,000.

09:39:40 14 Q 4,000?

09:39:41 15 A Yeah, last year. (Witness nods head).

09:39:43 16 Q And who owns the equipment for the snow  
09:39:45 17 removal?

09:39:45 18 A The church does.

09:39:47 19 Q And who does the actual snow removal

09:39:49 20 work?  
09:39:50 21 A I do it.  
09:39:51 22 Q Okay. So, in other words, you get paid

0028

09:39:53 1 separately for that?  
09:39:54 2 A Yes.  
09:39:55 3 Q All right. So you think a typical year  
09:39:56 4 you'll get about \$4,000?  
09:39:58 5 A Roughly. It depends.  
09:39:59 6 Q Uh-huh. How -- how long have you had  
09:40:01 7 this arrangement with the C.J. corporation or any  
09:40:07 8 other entity to do --  
09:40:08 9 A About --  
09:40:08 10 Q -- snow removal?  
09:40:08 11 A -- I guess about three years.  
09:40:09 12 Q Uh-huh.  
09:40:10 13 A Roughly about three years.  
09:40:11 14 Q Did it start before the apostle died?  
09:40:15 15 A Yeah.  
09:40:15 16 Q Right. Other than the snow removal  
09:40:17 17 contract that you have, do you have any other --  
09:40:21 18 do you get any other form of compensation,  
09:40:23 19 reimbursement, either directly or indirectly, from  
09:40:28 20 Jericho or any other entity?  
09:40:29 21 A No.  
09:40:30 22 Q All right. Do you get health benefits?

0029

09:40:32 1 A Health benefits, yeah.  
09:40:34 2 Q Uh-huh. Do you get a retirement?  
09:40:36 3 A No.  
09:40:36 4 Q Okay. And the salary that you make,  
09:40:40 5 the \$91,000, how long have you been paid at that  
09:40:44 6 rate, the \$91,000?  
09:40:50 7 A Since last year.  
09:40:51 8 Q Uh-huh. And what happened? What were  
09:40:53 9 you making before you got that pay raise?  
09:40:56 10 A Seven -- 71,000.  
09:40:58 11 Q Uh-huh. So you got a pay raise last  
09:41:01 12 year --  
09:41:04 13 A Pay raise.  
09:41:05 14 Q -- from 71 --  
09:41:07 15 A In '10.  
09:41:07 16 THE COURT REPORTER: Wait, wait.  
09:41:07 17 You've got to let him finish.

09:41:07 18 THE WITNESS: Okay.  
09:41:07 19 BY MR. MALONEY:  
09:41:10 20 Q One person has to talk at a time  
09:41:11 21 because our reporter will get very confused,  
09:41:14 22 appropriately, so . . .

0030

09:41:15 1 So your salary last year went from  
09:41:17 2 71,000 to 91,000?  
09:41:19 3 A Yeah, '010, yeah.  
09:41:22 4 Q What happened in 2010 to cause your  
09:41:24 5 salary to go from 71,000 to 91,000?  
09:41:27 6 A Well, I think I had -- when I had more  
09:41:30 7 responsibility --  
09:41:32 8 Q Uh-huh.  
09:41:31 9 A -- and, you know -- I had more  
09:41:36 10 responsibility.  
09:41:37 11 Q Well, when you say you had more  
09:41:39 12 responsibility, did you initiate a request for a  
09:41:42 13 salary increase?  
09:41:44 14 A No.  
09:41:44 15 Q Well, how did it come about? Did  
09:41:46 16 somebody come talk to you or --  
09:41:48 17 A The pass --  
09:41:50 18 Q What happened?  
09:41:51 19 A The apostle increased my salary.  
09:41:55 20 Q Well, I thought you said this happened  
09:41:57 21 in 2010?  
09:41:58 22 A Yeah.

0031

09:41:58 1 Q When in 2010 did it happen?  
09:42:08 2 A Might have been May; I believe May of  
09:42:11 3 2010.  
09:42:12 4 Q All right. So this is May when she was  
09:42:14 5 suffering from her final illness?  
09:42:18 6 MR. MARKS: Objection to the question.  
09:42:18 7 You may answer.  
09:42:20 8 BY MR. MALONEY:  
09:42:20 9 Q Go ahead. Was this May in 2010 when  
09:42:25 10 she was suffering from her final illness?  
09:42:28 11 A When she was very alert. So I wouldn't  
09:42:30 12 say her final.  
09:42:31 13 Q Uh-huh. And were you -- did she make  
09:42:33 14 the decision at her home to increase your salary?  
09:42:36 15 A Yes.



09:42:37 16 Q Tell me what you recall happened, what  
09:42:40 17 she said --  
09:42:40 18 A She call -- she called me and say I'm  
09:42:42 19 going to increase your salary.  
09:42:44 20 Q Uh-huh. And she called you on the  
09:42:49 21 telephone or she did this in person?  
09:42:49 22 A She called me on the telephone.

0032

09:42:50 1 Q Uh-huh. And where were you when the  
09:42:52 2 call came in?  
09:42:53 3 A I was at a church, working.  
09:42:55 4 Q All right. And what did she say to you  
09:42:57 5 and what did you say to her?  
09:42:59 6 A She said, Jack, I'm increasing your  
09:43:01 7 salary because, you know, you -- you know, you do  
09:43:06 8 a lot and I -- you know, and you -- you earned  
09:43:08 9 this.  
09:43:08 10 Q Was this a complete surprise to you?  
09:43:10 11 A Yes, it was.  
09:43:10 12 Q All right. What did you say to her?  
09:43:12 13 A I said thank you.  
09:43:14 14 Q Had you ever had your salary increased  
09:43:15 15 before by her like this?  
09:43:17 16 A Yes.  
09:43:18 17 Q When?  
09:43:19 18 A In -- I don't quite recall. Might have  
09:43:29 19 been 2000 -- I can't guess at it.  
09:43:32 20 Q Uh-huh. Well, how long had you been  
09:43:34 21 making 71,000?  
09:43:52 22 A Maybe 2001.

0033

09:43:54 1 Q Was your salary ever -- increase ever  
09:43:57 2 approved by the board of trustees, or was this  
09:44:01 3 just something she did, the apostle?  
09:44:05 4 A Just the apostle did that.  
09:44:06 5 Q All right. How many people report to  
09:44:08 6 you?  
09:44:21 7 A Six -- six people -- six -- six people  
09:44:25 8 and -- and eight contractor.  
09:44:28 9 Q Uh-huh. And how many of those people  
09:44:30 10 work on snow removal for you?  
09:44:32 11 A None of them.  
09:44:33 12 Q So you have no one that assists you on  
09:44:36 13 snow removal?

09:44:38 14 A No.  
09:44:38 15 Q You do it all by yourself?  
09:44:40 16 A Right.  
09:44:40 17 Q The -- are you the sole owner of this  
09:44:42 18 company known as --  
09:44:43 19 A Yes.  
09:44:43 20 Q -- C.J.?  
09:44:45 21 Okay. When did you come to Jericho as  
09:44:48 22 a -- as a congregant?

0034

09:44:51 1 A As a what?  
09:44:52 2 Q As a -- as a congregant, a member of  
09:44:54 3 the congregation.  
09:44:56 4 A 1990.  
09:44:57 5 Q Uh-huh. And how did you happen to come  
09:45:00 6 to Jericho?  
09:45:01 7 A My sister was a member there.  
09:45:02 8 Q Uh-huh. And what's her name?  
09:45:04 9 A Margaret Walker Ford.  
09:45:07 10 Q Uh-huh. And did she invite you to go  
09:45:08 11 to services with her?  
09:45:11 12 A Yes.  
09:45:11 13 Q Uh-huh. And then what happened?  
09:45:12 14 A I went a few more times and decided  
09:45:14 15 that I wanted to join the church.  
09:45:19 16 Q And what church had you been  
09:45:21 17 participating in prior to that?  
09:45:23 18 A Holy Cross.  
09:45:24 19 Q And where is Holy Cross located?  
09:45:27 20 A It's in Capitol Heights --  
09:45:37 21 Q Uh-huh.  
09:45:37 22 A -- Larchmont Street.

0035

09:45:37 1 THE COURT REPORTER: The last part,  
09:45:37 2 Capitol Heights what?  
09:45:37 3 THE WITNESS: Capitol Heights,  
09:45:37 4 Maryland.  
09:45:37 5 BY MR. MALONEY:  
09:45:38 6 Q And how did you come to know and come  
09:45:41 7 to work for the apostle?  
09:45:46 8 A I've been work -- I worked around the  
09:45:49 9 church.  
09:45:49 10 Q Uh-huh. As a volunteer or --  
09:45:54 11 A Yeah, as a volunteer.

09:45:55 12 Q What kind of work did you do?  
09:45:56 13 A Security.  
09:45:56 14 Q Uh-huh.  
09:45:57 15 A And working out on the parking lot.  
09:46:06 16 Q Assisting in the parking of cars?  
09:46:08 17 A Yeah, parking cars.  
09:46:10 18 Q Go ahead.  
09:46:10 19 A And attended her class.  
09:46:12 20 Q Uh-huh. And what class was that?  
09:46:13 21 A The beginning.  
09:46:16 22 Q Uh-huh. As far as your salary, is it a

0036

09:46:19 1 fact that you actually made about \$62,000 through  
09:46:23 2 most of the last decade?  
09:46:32 3 A (Witness shakes head.)  
09:46:32 4 Q Is that -- you have to give a verbal  
09:46:35 5 answer.  
09:46:36 6 A I think around -- like I say, around  
09:46:37 7 71.  
09:46:38 8 Q And what causes you to believe that you  
09:46:40 9 were making 71 and not 62?  
09:46:46 10 A Because I -- that's what -- that's what  
09:46:48 11 my statements are, I think, that said.  
09:46:53 12 Q And after you're doing these odd jobs  
09:46:54 13 and security work for the apostle, what happened  
09:46:58 14 next?  
09:46:59 15 MR. MARKS: Let me object to the  
09:47:00 16 characterization. His jobs were for the church,  
09:47:04 17 not for the apostle.  
09:47:06 18 MR. MALONEY: Well, whoever.  
09:47:08 19 BY MR. MALONEY:  
09:47:08 20 Q I mean, you were doing it at Jericho;  
09:47:10 21 right?  
09:47:11 22 A Yeah.

0037

09:47:11 1 Q Okay. How did it come to be that you  
09:47:13 2 moved from a volunteer position into a salary  
09:47:16 3 position?  
09:47:17 4 A The pastor asked me to.  
09:47:18 5 Q And at that point, who else was  
09:47:21 6 involved in the leadership of the church? And  
09:47:25 7 when you say "pastor," you're referring to the  
09:47:28 8 apostle, Betty Peebles?  
09:47:31 9 A Yeah, the apostle.

09:47:32 10 Q Okay. Who else was involved in the  
09:47:33 11 leadership of the church besides the apostle?  
09:47:37 12 A At what time?  
09:47:38 13 Q At the time that you went to work  
09:47:39 14 full-time for the church.  
09:47:44 15 A The apostle and -- and Joel was there.  
09:47:47 16 Q Uh-huh. Anyone else?  
09:47:48 17 A And the rest of the congregation and  
09:47:52 18 the --  
09:47:52 19 Q Uh-huh.  
09:47:52 20 A -- administrator.  
09:47:53 21 Q Was there ever a break in your  
09:47:55 22 membership in the church?

0038

09:47:56 1 A No.  
09:47:57 2 Q So you have continuously attended  
09:48:01 3 Jericho City of Praise from the first time that  
09:48:04 4 you joined?  
09:48:05 5 A Yes.  
09:48:05 6 Q And when was it that you first joined  
09:48:08 7 Jericho; was it 1990?  
09:48:10 8 A 1990.  
09:48:11 9 Q Okay. And as far as the ministries of  
09:48:13 10 the church, what ministries have you been involved  
09:48:15 11 with?  
09:48:16 12 A As far as the ministry in the church?  
09:48:19 13 Q Yes.  
09:48:20 14 A The deacon; I'm on the deacon board.  
09:48:25 15 Q Uh-huh. Anything else?  
09:48:27 16 A And just like I said, the bus ministry,  
09:48:31 17 I'm overseeing that, and the security.  
09:48:33 18 Q The transportation ministry, the bus  
09:48:38 19 ministry?  
09:48:38 20 A Yeah.  
09:48:38 21 Q And security?  
09:48:39 22 A Uh-huh.

0039

09:48:39 1 Q Any other ministries have you served in  
09:48:40 2 besides those three?  
09:48:42 3 A No.  
09:48:43 4 Q Have you ever resigned from any of  
09:48:44 5 those ministries?  
09:48:45 6 A No.  
09:48:45 7 Q Have you ever resigned from any

09:48:47 8 position at Jericho?  
09:48:50 9 A No.  
09:48:51 10 Q Were you ever terminated or did you  
09:48:53 11 resign at any point before Betty Peebles' death?  
09:48:58 12 A No.  
09:48:58 13 Q All right. Who is your direct  
09:48:59 14 supervisor on a day-to-day basis?  
09:49:04 15 A At that time it was Apostle  
09:49:09 16 Betty Peebles.  
09:49:10 17 Q All right. How about after her death?  
09:49:12 18 A Then I report to Denise Killen.  
09:49:17 19 Q Pardon me?  
09:49:19 20 A Denise.  
09:49:20 21 Q All right. Would you give her full  
09:49:21 22 name for the court --

0040

09:49:23 1 A Denise Killen.  
09:49:24 2 Q And when did you start reporting to  
09:49:26 3 Denise?  
09:49:27 4 A I guess right after the pastor passed.  
09:49:29 5 Q And who directed you to report to  
09:49:30 6 Denise?  
09:49:34 7 A The -- well, the pastor said that  
09:49:36 8 Denise would be in charge of the daily operation.  
09:49:38 9 Q And when did she tell you that?  
09:49:41 10 A Well -- well, that was -- that was  
09:49:52 11 before she passed.  
09:49:53 12 Q Do you remember where you were and  
09:49:54 13 where she was?  
09:49:55 14 A No -- oh, yeah, I do. She was -- she  
09:49:58 15 was home.  
09:49:59 16 Q In her bedroom?  
09:50:00 17 A Uh-huh.  
09:50:00 18 Q Is that a yes? You have to give a yes  
09:50:02 19 or no.  
09:50:03 20 A Yes.  
09:50:03 21 Q And who else was there?  
09:50:06 22 A That's all, just the -- the apostle and

0041

09:50:08 1 myself.  
09:50:09 2 Q And what did she say to you and what  
09:50:11 3 did you say to her?  
09:50:12 4 A She said that you -- you report to  
09:50:17 5 Denise and that you working right along with

09:50:24 6 Denise.  
09:50:25 7 Q How soon prior to her death did she say  
09:50:27 8 this to you?  
09:50:30 9 A Oh, gee. At least a month.  
09:50:41 10 Q Was there ever a meeting of the board  
09:50:43 11 of trustees to direct you to report to Denise or  
09:50:46 12 to make her the chief operating officer?  
09:50:50 13 MR. MARKS: Objection; no foundation.  
09:50:52 14 You may answer if you know.  
09:50:53 15 THE WITNESS: Repeat your question.  
09:50:55 16 MR. MALONEY: Go ahead and read the  
09:50:56 17 question back.  
09:50:56 18 (The Record was read as requested.)  
09:51:15 19 THE WITNESS: Not that I recall.  
09:51:19 20 BY MR. MALONEY:  
09:51:20 21 Q Do you continue to report to Denise on  
09:51:22 22 a day-to-day basis?

0042

09:51:23 1 A Yes.  
09:51:24 2 Q Did Denise direct you to recently  
09:51:26 3 change the locks at the church facilities?  
09:51:28 4 A No.  
09:51:29 5 Q Did you change the locks at the church  
09:51:31 6 facilities?  
09:51:33 7 A I changed -- yes, I did.  
09:51:35 8 Q Was that a decision that you made on  
09:51:36 9 your own?  
09:51:37 10 A That was a board decision.  
09:51:38 11 Q All right. So there was a board  
09:51:39 12 decision to change the locks; is that correct?  
09:51:47 13 A That's correct.  
09:51:47 14 Q All right. Tell me what you recall  
09:51:48 15 about the board meeting that was called to discuss  
09:51:49 16 the issue of the change in the locks.  
09:51:51 17 A Well, Joel had -- was in the -- he took  
09:51:57 18 office -- the apostle's office, and one of my  
09:52:04 19 maintenance engineer came to me and said that Joel  
09:52:07 20 told him to drill a lock out of the pastor's file  
09:52:12 21 and that he said that he was in charge; for him to  
09:52:18 22 go ahead and drill the lock.

0043

09:52:19 1 Q And what happened?  
09:52:20 2 A And I report that to the board, and the  
09:52:21 3 board said was, then change the lock on -- on our

09:52:26 4 office doors because, you know, we don't want him  
09:52:31 5 to be coming in there taking files out.  
09:52:33 6 Q On whose office door?  
09:52:35 7 A The -- the -- Denise office, the  
09:52:38 8 financials office.  
09:52:42 9 Q And anyone else's?  
09:52:44 10 A No.  
09:52:46 11 Q And was there an actual board meeting  
09:52:48 12 called, or did you talk on the telephone, or how  
09:52:50 13 did this work?  
09:52:51 14 A Well, it just so happened it was a  
09:52:52 15 board meeting, and I brought that up.  
09:52:56 16 Q So the board was there that day?  
09:52:58 17 A Yeah.  
09:52:58 18 Q Was that an evening meeting?  
09:53:00 19 A That evening.  
09:53:00 20 Q All right. And did you call a  
09:53:01 21 locksmith to do this?  
09:53:03 22 A No.

0044

09:53:03 1 Q All right. How did you accomplish the  
09:53:05 2 change in the locks?  
09:53:06 3 A We -- well, one of my maintenance  
09:53:09 4 engineer took the lock cylinders out and had it  
09:53:15 5 re-keyed.  
09:53:17 6 Q Uh-huh. And which maintenance engineer  
09:53:19 7 was that?  
09:53:19 8 A Theo Campbell (phonetics).  
09:53:21 9 Q And have the locks been changed again  
09:53:23 10 since that occurred?  
09:53:26 11 A Not at the office, no.  
09:53:28 12 Q How about any other locks?  
09:53:30 13 A Yes.  
09:53:31 14 Q What locks have been changed since  
09:53:33 15 then?  
09:53:34 16 A The lock had been changed when Joel put  
09:53:37 17 the -- put -- put the locks on the pastor's  
09:53:41 18 conference room and her office three o'clock in  
09:53:47 19 the morning.  
09:53:47 20 Q Did there come a time when Joel asked  
09:53:49 21 you for the keys to the church doors?  
09:53:52 22 A Yes, he did.

0045

09:53:53 1 Q And when was that?

09:53:54 2 A That was two days after Pastor passed.  
09:53:58 3 Q Uh-huh. And what did you tell him?  
09:54:03 4 A I thought that -- that he was talking  
09:54:05 5 about the master key that he had already.  
09:54:12 6 Q Uh-huh.  
09:54:12 7 A And after I thought about it after a  
09:54:14 8 while --  
09:54:16 9 Q Uh-huh.  
09:54:17 10 A -- he was asking for keys for  
09:54:19 11 everything.  
09:54:19 12 Q Uh-huh.  
09:54:21 13 A So I called the board members up, and  
09:54:24 14 the board members said, no, don't give him any  
09:54:28 15 additional keys to the finance office.  
09:54:31 16 Q Uh-huh. And when did this take place?  
09:54:33 17 A Two days after Pastor passed.  
09:54:35 18 Q And which board members did you talk  
09:54:37 19 to?  
09:54:42 20 A All of them.  
09:54:43 21 Q And when you say "all of them," who do  
09:54:44 22 you consider to be the board members?

0046

09:54:44 1 A Denise Killen --  
09:54:45 2 Q Uh-huh.  
09:54:45 3 A -- Dorothy Williams --  
09:54:46 4 Q Uh-huh.  
09:54:46 5 A -- Gloria MaGruder --  
09:54:49 6 Q Uh-huh.  
09:54:49 7 A -- Boswell.  
09:54:50 8 Q Was there an actual board meeting or  
09:54:51 9 did you just call them all individually?  
09:54:53 10 A I called them all individual and asked  
09:54:55 11 them.  
09:54:55 12 Q All right. So there never was a formal  
09:54:57 13 board meeting on this?  
09:54:58 14 A No.  
09:54:59 15 Q All right. So you never actually gave  
09:55:00 16 him the keys; is that correct?  
09:55:02 17 A No, I didn't.  
09:55:02 18 Q All right. What did you tell him when  
09:55:04 19 he asked you for the keys and you didn't give them  
09:55:06 20 to him?  
09:55:07 21 A I told him that the board de -- that  
09:55:08 22 the board decided that they wouldn't -- didn't



09:55:10 1 want to give him the keys.  
 09:55:12 2 Q Uh-huh. Did you ever place a bar on  
 09:55:13 3 the door of the church?  
 09:55:16 4 A No.  
 09:55:17 5 Q Did you ever place a bar on the  
 09:55:18 6 apostle's office or her suite?  
 09:55:22 7 A A bar, no.  
 09:55:22 8 Q Did you ever place any kind of lock or  
 09:55:25 9 other bar to entry, something else that would --  
 09:55:29 10 A What I --  
 09:55:30 11 Q -- obstruct entry into the apostle's  
 09:55:33 12 suite?  
 09:55:34 13 A What I -- what I had done was put a --  
 09:55:37 14 a -- a -- a strip to keep people from using a  
 09:55:41 15 credit card to get in.  
 09:55:43 16 Q Uh-huh. And what was that strip,  
 09:55:45 17 what -- if you would describe that for the record?  
 09:55:47 18 A It's a metal strip.  
 09:55:48 19 Q Uh-huh. And when did you put that in?  
 09:55:52 20 A When I found out that the door was --  
 09:55:54 21 someone had been in there.  
 09:55:56 22 Q And who did you find out had entered

09:55:58 1 the suite?  
 09:55:59 2 A I -- I never found out who -- who had  
 09:56:01 3 entered.  
 09:56:02 4 Q How do you know a credit card had been  
 09:56:04 5 used, or do you?  
 09:56:05 6 A Because we tried it.  
 09:56:06 7 Q Uh-huh. And that worked?  
 09:56:07 8 A It worked.  
 09:56:08 9 Q And when did all this take place?  
 09:56:15 10 A Maybe three months ago, two months ago.  
 09:56:18 11 Q Is that strip still there?  
 09:56:20 12 A Yeah.  
 09:56:21 13 Q Who occupies the apostle's suite now?  
 09:56:26 14 A No one.  
 09:56:27 15 Q All right. The -- with respect to the  
 09:56:29 16 governance of the church, who do you consider  
 09:56:31 17 right now to be the governance of the church?  
 09:56:35 18 A Repeat your question.  
 09:56:36 19 Q Who do you consider now to be the  
 09:56:39 20 members of the board of trustees?  
 09:56:42 21 A The members of the board of trustees?

09:56:45 22 Q Yes.

0049

09:56:45 1 A The group that I'm on.

09:56:47 2 Q Has the -- that board of trustees ever  
09:56:48 3 authorized you to put cameras in the church?

09:56:52 4 A Yes.

09:56:52 5 Q Security cameras?

09:56:53 6 A Yes.

09:56:54 7 Q When did that take place?

09:56:55 8 A Well, just recently.

09:56:56 9 Q Uh-huh. Tell me about how that  
09:56:57 10 decision was made.

09:56:58 11 A Well, the decision was that when --  
09:57:05 12 when the office closed down at 6:00, you had  
09:57:10 13 people still coming, trying to get into the  
09:57:14 14 administration, and they want to be able -- when  
09:57:16 15 they upstairs working, want to be able to see  
09:57:20 16 who's at the door and -- and to buzz them in.

09:57:23 17 Q Uh-huh. And is there a video capacity  
09:57:25 18 associated with this?

09:57:26 19 A It will be, yes.

09:57:27 20 Q It has not been installed yet?

09:57:29 21 A Has not been installed.

09:57:30 22 Q What is the company that's installing

0050

09:57:32 1 the video; what's that name?

09:57:33 2 A Well, I'm -- I have an individual  
09:57:35 3 that's going to install it.

09:57:37 4 Q And who is that?

09:57:38 5 A It'd be Nightwatch.

09:57:40 6 Q And how much is this video system  
09:57:43 7 costing?

09:57:43 8 A \$895.

09:57:45 9 Q Is one of the reasons this video system  
09:57:47 10 has been installed to observe the comings and  
09:57:50 11 goings of Joel Peebles and his wife?

09:57:52 12 A No.

09:57:53 13 Q Were the -- was the police called on  
09:57:54 14 Joel Peebles' wife yesterday?

09:57:57 15 A No.

09:57:57 16 Q Not that you're aware of?

09:57:58 17 A No.

09:57:59 18 Q Okay. With respect to the board of  
09:58:01 19 trustees and the governance, did you ever have any

09:58:06 20 conversations with the apostle about the  
09:58:09 21 governance of the church or the board of trustees  
09:58:12 22 prior to her death?

0051

09:58:46 1 A Repeat the question.  
09:58:47 2 MR. MALONEY: Can you read the question  
09:58:48 3 back?  
09:58:48 4 (The Record was read as requested.)  
09:58:49 5 THE WITNESS: She the one that had to  
09:58:50 6 discuss with us, with the board.  
09:58:51 7 BY MR. MALONEY:  
09:58:52 8 Q I'm sorry. I didn't hear your answer.  
09:58:54 9 A She discussed with the board any --  
09:58:57 10 anything that the governance of the church, the  
09:59:02 11 apostle discussed it with us when we were working  
09:59:05 12 on the -- on the board.  
09:59:07 13 Q So she discussed this with you as a  
09:59:09 14 board?  
09:59:10 15 A As a -- as a group, a board.  
09:59:13 16 Q Well, with that group, who are you --  
09:59:15 17 what names are you referring to?  
09:59:17 18 A Okay. The current board.  
09:59:18 19 Q And give me -- give me their names who  
09:59:20 20 you consider the current board.  
09:59:21 21 A Denise Killen --  
09:59:23 22 Q Uh-huh.

0052

09:59:22 1 A -- Dorothy Williams, Gloria MaGruder --  
09:59:28 2 Q Uh-huh.  
09:59:27 3 A -- Boswell and Linda Pyles and then  
09:59:30 4 myself.  
09:59:31 5 Q When did you become a member of the  
09:59:33 6 board of trustees?  
09:59:34 7 A March the 15th, '09.  
09:59:36 8 Q Uh-huh. Tell me what you remember  
09:59:37 9 about that day and how you became a member of the  
09:59:39 10 board.  
09:59:43 11 A I drove Pastor to church that day, and  
09:59:46 12 she said that -- come to my office at -- after  
09:59:51 13 service.  
09:59:55 14 Q Uh-huh.  
09:59:53 15 A And I came to her office, and she had  
10:00:00 16 some paper on the desk and she said, I want you to  
10:00:04 17 sign this because I'm make -- I'm making a -- I --

10:00:08 18 I want you to be on trustee -- be a trustee, and I  
10:00:11 19 signed my name there.  
10:00:13 20 Q And so you signed a document making you  
10:00:15 21 a trustee?  
10:00:16 22 A Yeah.

0053

10:00:16 1 Q Was that a complete surprise to you?  
10:00:18 2 A Yeah.  
10:00:19 3 Q Prior to that time, had she ever said  
10:00:23 4 anything to you about becoming a trustee?  
10:00:25 5 A No.  
10:00:26 6 Q Prior to that time, had she ever  
10:00:29 7 expressed any concerns to you about the current  
10:00:32 8 board of trustees?  
10:00:33 9 A No.  
10:00:35 10 Q Did you have any warning that she was  
10:00:37 11 going to be making a change in the board of  
10:00:38 12 trustees?  
10:00:39 13 A No.  
10:00:40 14 Q And was this after the eleven o'clock  
10:00:43 15 service?  
10:00:44 16 A Yes.  
10:00:44 17 Q And when you were in her office and she  
10:00:47 18 had you sign a piece of paper, was anyone else  
10:00:50 19 present there?  
10:00:52 20 A Yeah, it was her armor bearer, Shonda.  
10:01:02 21 THE COURT REPORTER: Her what, now?  
10:01:02 22 THE WITNESS: Her armor bearer.

0054

10:01:02 1 BY MR. MALONEY:  
10:01:02 2 Q Armor bearer?  
10:01:04 3 A Uh-huh.  
10:01:04 4 Q Okay. And what is that person's full  
10:01:06 5 name?  
10:01:06 6 A I don't -- I don't know. I just --  
10:01:08 7 Q Do you know her first name?  
10:01:09 8 A -- just know her first name, Shonda.  
10:01:10 9 Q And can you spell that?  
10:01:14 10 A S-H-A-R-E-O (sic), Shonda.  
10:01:23 11 Q Anyone else there?  
10:01:24 12 A No.  
10:01:24 13 Q And did she say anything else to you or  
10:01:29 14 just sign this document? Is that all she said to  
10:01:32 15 you?

10:01:32 16 A Yeah.  
10:01:33 17 Q And after you signed the document, what  
10:01:36 18 happened?  
10:01:38 19 A Then I left and -- to go out to secure  
10:01:45 20 the church.  
10:01:46 21 Q Was there anyone else in the room who  
10:01:48 22 was a member of the board of trustees that day?

0055

10:01:50 1 A No, it was just -- just Shonda and --  
10:01:54 2 and myself and Apostle.  
10:01:56 3 Q Who were the members of the board of  
10:01:58 4 trustees prior to the time that you joined the  
10:02:00 5 board, or you believe you joined the board, on  
10:02:03 6 March 15th of 2009?  
10:02:10 7 A Who were?  
10:02:11 8 Q Yes.  
10:02:20 9 A I -- I think that who -- who were  
10:02:23 10 were -- prior to -- to I join?  
10:02:30 11 Q Yes.  
10:02:31 12 A I think Ann Wesley was.  
10:02:34 13 Q Okay.  
10:02:35 14 A And William Meadows.  
10:02:36 15 Q And how about Joel Peebles?  
10:02:38 16 A I'm not sure.  
10:02:39 17 Q Do you know one way or the other  
10:02:40 18 whether or not Joel Peebles was a member of the  
10:02:43 19 board of trustees on or before March 15th of 2009?  
10:02:52 20 A Yeah. Yeah, as I recall.  
10:02:57 21 Q What is it you recall?  
10:02:58 22 A That document that you had the other

0056

10:03:00 1 day you showed us, my name was on there as a  
10:03:04 2 trustee, and I saw his name on there. Because  
10:03:09 3 Pastor asked me that day, I think it was 2006,  
10:03:13 4 that she needed another person on -- as a trustee,  
10:03:15 5 and would I sign my name, and I signed my name.  
10:03:22 6 Q So --  
10:03:23 7 A His name was on there.  
10:03:23 8 Q So you believe that both he and you  
10:03:24 9 were on the board of trustees as far back as 2006?  
10:03:29 10 A No, no.  
10:03:31 11 Q Uh-huh.  
10:03:31 12 A No. I -- I -- I don't believe that. I  
10:03:34 13 just believe that Pastor had given me -- told me

10:03:39 14 to sign that document because she needed another  
10:03:43 15 name on there.  
10:03:44 16 Q She needed another person to be a  
10:03:46 17 member of the board of trustees; is that correct?  
10:03:49 18 A Right.  
10:03:49 19 Q All right. And I'm showing you -- if  
10:03:52 20 you would take a look at tab number 9. And this  
10:04:00 21 is a two-year report for nonprofit foreign and  
10:04:04 22 domestic corporations. And it lists Clarence

0057

10:04:10 1 Jackson there as a director.  
10:04:13 2 Do you see that?  
10:04:13 3 A Uh-huh.  
10:04:14 4 Q Is that the document you're referring  
10:04:15 5 to?  
10:04:16 6 A Is this a -- what year is this?  
10:04:19 7 Q Well, this is actually January 15th of  
10:04:21 8 2000.  
10:04:23 9 A Yeah, that's when -- yeah.  
10:04:27 10 Q All right. Do you -- is this the  
10:04:28 11 document you're referring to?  
10:04:29 12 A Yeah.  
10:04:30 13 Q All right. Did -- I don't see your  
10:04:32 14 signature here; is that -- it looks like someone  
10:04:34 15 has written your name here.  
10:04:36 16 Do you recall signing a document in  
10:04:38 17 addition to this, or just allowing your name to be  
10:04:41 18 used?  
10:04:42 19 A No, that's my -- you see my CJ, that's  
10:04:45 20 my signature there.  
10:04:46 21 Q All right. So that's your initial  
10:04:47 22 right there next to --

0058

10:04:48 1 A Yeah, that's it.  
10:04:49 2 Q Okay. So --  
10:04:50 3 A And my initial up top where  
10:04:54 4 Betty Peebles' name is.  
10:04:56 5 Q Where is that? Up at the top, you  
10:04:58 6 signed that, too?  
10:04:59 7 A I initialed that.  
10:05:01 8 Q All right. What do you recall about  
10:05:02 9 the circumstances concerning the preparation of  
10:05:03 10 this document?  
10:05:05 11 A Only thing I recall is that she said

10:05:07 12 that she needed another name on here and will I  
10:05:10 13 sign it, and I say yes.  
10:05:12 14 Q And you recall, being another name,  
10:05:14 15 that you would also agree to be on the board of  
10:05:16 16 directors at that point?  
10:05:18 17 A I just signed my name on there.  
10:05:20 18 Q Okay.  
10:05:20 19 A And she asked me to sign my name.  
10:05:22 20 Q And did you understand that you were  
10:05:24 21 signing your name to be a director of the  
10:05:26 22 corporation at that point?

0059

10:05:29 1 A Not really.  
10:05:30 2 Q What did you think you were signing  
10:05:32 3 for?  
10:05:32 4 A I was just signing because she asked me  
10:05:35 5 to sign it.  
10:05:35 6 Q I understand that you were signing it  
10:05:37 7 because she asked you to, but my question is a  
10:05:39 8 different one. My question is, what did you  
10:05:41 9 understand you were signing and accomplishing by  
10:05:44 10 signing this document? What --  
10:05:46 11 A I --  
10:05:46 12 Q -- were you doing?  
10:05:47 13 A I wasn't accomplishing anything but  
10:05:50 14 pleasing her.  
10:05:51 15 Q All right. So you -- did you have no  
10:05:56 16 idea what the effect of your signature is here or  
10:05:57 17 what this was for?  
10:05:57 18 A No.  
10:05:57 19 Q When you signed this, you saw, in fact,  
10:05:58 20 that you were being listed as a director here;  
10:06:00 21 isn't that correct?  
10:06:01 22 A Yeah.

0060

10:06:02 1 Q All right. So you had an understanding  
10:06:04 2 when you put your initials next to this that you  
10:06:07 3 would be listed as a board of directors member;  
10:06:11 4 isn't that correct?  
10:06:12 5 A Yes.  
10:06:12 6 Q And you saw this document at that time  
10:06:13 7 which listed the other directors as being  
10:06:17 8 John Peebles, Betty Peebles, Joel Peebles,  
10:06:21 9 Ann Wesley and Dorothy Williams; is that correct?

10:06:28 10 A Yes.  
10:06:28 11 Q Was that your best understanding as to  
10:06:30 12 who the other directors were of the board of  
10:06:32 13 trustees at the time this document was prepared?  
10:06:34 14 A Well, you know, Mr. Maloney, I'm want  
10:06:39 15 to be -- be honest, and I have been so far. I  
10:06:42 16 just signed my name there, and I didn't -- and --  
10:06:44 17 and put my address there, and that was it.  
10:06:46 18 Q All right.  
10:06:47 19 A But I didn't get into, you know, the  
10:06:48 20 detail of it.  
10:06:49 21 Q All right. But at the same time you  
10:06:51 22 signed your name to this, the other names that I

0061

10:06:53 1 just read to you --  
10:06:54 2 A I -- I didn't pay any attention to the  
10:06:56 3 other names --  
10:06:56 4 Q All right. But --  
10:06:57 5 A -- at the time.  
10:06:57 6 Q -- they were listed there at the  
10:07:00 7 time --  
10:07:01 8 A Yeah, I didn't pay any --  
10:07:01 9 Q -- you signed them; correct?  
10:07:01 10 A Right, but I didn't pay any attention  
10:07:03 11 to it.  
10:07:04 12 Q All right. So you saw them there, but  
10:07:05 13 you didn't pay attention to them; is that correct?  
10:07:08 14 MR. MARKS: Objection to the  
10:07:09 15 characterization.  
10:07:09 16 BY MR. MALONEY:  
10:07:09 17 Q Is that correct?  
10:07:10 18 MR. MARKS: Objection. Don't answer  
10:07:11 19 until I finish.  
10:07:12 20 The witness stated he didn't pay  
10:07:14 21 attention to the names. He's asked and answered  
10:07:16 22 the question.

0062

10:07:16 1 BY MR. MALONEY:  
10:07:16 2 Q My question is a little different to  
10:07:18 3 you, though. Was -- was those names blank and not  
10:07:21 4 there when you signed them, or were they all there  
10:07:23 5 and you just didn't pay attention to them?  
10:07:25 6 A I -- I wasn't aware of them.  
10:07:26 7 Q All right. And, as far as you know,



10:07:27 8 Joel Peebles was a director of the -- member of  
10:07:30 9 the board of trustees as far back as 2000 when  
10:07:32 10 this document was prepared; is that correct?  
10:07:34 11 MR. MARKS: Objection to the  
10:07:35 12 characterization of the question.  
10:07:36 13 You may answer if you know.  
10:07:40 14 THE WITNESS: Well, let me say this. I  
10:07:43 15 haven't seen any document that he was elected to  
10:07:46 16 the board, so I can't -- that's the only way I can  
10:07:48 17 answer that question to you.  
10:07:50 18 BY MR. MALONEY:  
10:07:51 19 Q Well, you were present at the prior  
10:07:52 20 depositions when we reviewed Exhibit 9,  
10:07:59 21 Exhibit 11, Exhibit 12, Exhibit 14. You saw all  
10:08:02 22 these various exhibits before which reflect that

0063

10:08:05 1 he was a director going all the way back to -- or  
10:08:10 2 a member of the board of trustees going all the  
10:08:14 3 way back to 1996; correct? You've seen those  
10:08:16 4 documents. And, if not, we can walk through them  
10:08:18 5 right now.  
10:08:21 6 A (Indicating.)  
10:08:21 7 Q Let's -- let's take a look right now.  
10:08:23 8 We'll go to -- we'll begin by taking a look at tab  
10:08:33 9 3. And this is a 1996 -- actually, let's begin at  
10:08:44 10 tab 5. We have Betty Peebles having authority to  
10:08:50 11 accept.  
10:08:59 12 Take a look at tab 7, Certificate of  
10:09:02 13 Organizational Documents. This is prepared 13th  
10:09:05 14 day of December, 1998, with Betty Peebles,  
10:09:09 15 Joel Peebles, William Meadows and Lucy Lane.  
10:09:15 16 A Wait a minute now.  
10:09:15 17 Q Let's -- we're going to just focus  
10:09:16 18 right now on tab 7, okay?  
10:09:17 19 A Wait a minute. I'm not following. Tab  
10:09:19 20 7, I'm just thinking you're talking about --  
10:09:22 21 Q Tab 7. You're -- we're on the same  
10:09:23 22 page. Look at the second page of that document at

0064

10:09:25 1 tab 7.  
10:09:26 2 A Okay.  
10:09:26 3 Q Do you see certificate -- Certificate  
10:09:27 4 of Organizational Documents which lists the  
10:09:30 5 trustees as Betty Peebles, Joel Peebles,

10:09:34 6 William Meadows and Lucy Lane?  
10:09:37 7 A Uh-huh.  
10:09:37 8 Q Do you see that?  
10:09:39 9 A Yeah, I see that.  
10:09:40 10 Q Is this the first time you've ever seen  
10:09:41 11 that?  
10:09:42 12 A Yes.  
10:09:42 13 Q All right. So you -- prior to today,  
10:09:43 14 you had never had a chance -- you had never  
10:09:46 15 reviewed this document or seen it prior to today;  
10:09:49 16 is that correct?  
10:09:49 17 A That's correct.  
10:09:50 18 Q Do you have any reason to doubt the  
10:09:51 19 authenticity or genuineness of this document,  
10:09:55 20 which is tab 7?  
10:10:00 21 MR. MARKS: Objection; no foundation.  
10:10:02 22 You may answer if you know.

0065

10:10:12 1 THE WITNESS: (Reviews document.)  
10:10:14 2 Well, again, my answer to you would be that I  
10:10:22 3 don't know that -- that these people were elected  
10:10:25 4 to the board.  
10:10:28 5 BY MR. MALONEY:  
10:10:28 6 Q Is it your testimony that you just  
10:10:30 7 don't have any information one way or the other as  
10:10:33 8 to who the members of the board were on  
10:10:35 9 December 13th, 1998?  
10:10:37 10 A Right.  
10:10:38 11 Q All right. But you don't have any  
10:10:39 12 reason to doubt that Joel Peebles was a member of  
10:10:42 13 the board on December 13th of 1998, do you?  
10:10:46 14 MR. MARKS: Objection to the  
10:10:47 15 characterization. The witness just stated he did  
10:10:49 16 not know.  
10:10:50 17 BY MR. MALONEY:  
10:10:50 18 Q My question is --  
10:10:52 19 MR. MARKS: You may answer if you know.  
10:10:53 20 BY MR. MALONEY:  
10:10:53 21 Q My question is a different one. I want  
10:10:55 22 to make sure you understand the question.

0066

10:10:56 1 Do you have any reason to doubt -- any  
10:11:02 2 information or any facts that are known to you to  
10:11:03 3 doubt that on December the 13th of 1998,

10:11:05 4 Joel Peebles was not, in fact, a member of the  
10:11:08 5 board of trustees?  
10:11:15 6 A I wasn't aware of it.  
10:11:17 7 Q One way or the other; is that correct?  
10:11:19 8 A One way or the other.  
10:11:20 9 Q So -- and you had no idea who, in fact,  
10:11:23 10 served on the board of trustees at that point; is  
10:11:25 11 that correct?  
10:11:29 12 A No, I don't.  
10:11:30 13 Q And I'm going to ask you to take a look  
10:11:32 14 at tab 8. This is another organizational  
10:11:37 15 resolution dated January the 27th of 2000. It  
10:11:40 16 lists the trustees as Betty Peebles, Joel Peebles,  
10:11:43 17 William Meadows and Lucy Lane, and contains all of  
10:11:46 18 their signatures except Ms. Lane.  
10:11:49 19 Do you have any reason to doubt the  
10:11:50 20 authenticity or genuineness of this document?  
10:11:58 21 MR. MARKS: Objection; no foundation.  
10:12:00 22 You may answer if you know. There's no

0067

10:12:02 1 foundation that this witness has any information  
10:12:04 2 about this document, but you may answer if you  
10:12:06 3 know.  
10:12:09 4 THE WITNESS: The only thing that I can  
10:12:10 5 say is that Pastor Peebles' signature.  
10:12:14 6 BY MR. MALONEY:  
10:12:15 7 Q Is that -- do you believe that's a --  
10:12:17 8 A That's her signature.  
10:12:17 9 Q Okay. And do you have any reason to  
10:12:20 10 doubt that on January the 27th of 2000, that  
10:12:25 11 Joel Peebles, Senior, was, in fact, a member of  
10:12:27 12 the board of trustees?  
10:12:32 13 A I haven't seen any document that he was  
10:12:34 14 elected to the board.  
10:12:35 15 Q Do you have any reason to doubt --  
10:12:36 16 other than the fact that you haven't seen any  
10:12:38 17 document, do you have any reason --  
10:12:45 18 A Yeah --  
10:12:45 19 Q -- to --  
10:12:45 20 A -- I have --  
10:12:45 21 Q -- doubt --  
10:12:45 22 A -- doubt.

0068

10:12:45 1 Q -- his --

10:12:45 2 A Yeah, I --  
10:12:45 3 Q -- membership?  
10:12:45 4 A -- have doubt.  
10:12:46 5 THE COURT REPORTER: You've got to let  
10:12:46 6 him finish the question.  
10:12:46 7 THE WITNESS: I have doubt.  
10:12:46 8 BY MR. MALONEY:  
10:12:46 9 Q And -- and what is that doubt based on?  
10:12:48 10 A The doubt is based on that I haven't  
10:12:50 11 seen any document so far say he was elected to the  
10:12:53 12 board.  
10:12:54 13 Q Have you ever seen any document to show  
10:12:56 14 that William Meadows was elected to the board?  
10:12:58 15 A No.  
10:12:58 16 Q Have you seen any document to show that  
10:13:00 17 Betty Peebles herself was elected to the board?  
10:13:04 18 A Betty Peebles is the board.  
10:13:05 19 Q Is it your testimony, in fact, she was  
10:13:07 20 the board and that there were no other trustees?  
10:13:09 21 A I'm not aware of any other trustees.  
10:13:12 22 Q All right. So your belief is that

0069

10:13:14 1 Betty Peebles, in fact, was the sole trustee of  
10:13:18 2 the corporation prior to her death?  
10:13:20 3 MR. MARKS: Objection. There's no  
10:13:22 4 foundation; and mischaracterizes the testimony.  
10:13:25 5 You may answer if you know.  
10:13:34 6 THE WITNESS: That -- I can say that --  
10:13:35 7 what I heard, William Meadows and Ann Wesley was  
10:13:46 8 the board and Apostle Betty Peebles.  
10:13:49 9 BY MR. MALONEY:  
10:13:50 10 Q And where did you get that information  
10:13:52 11 from?  
10:13:52 12 A From hearsay.  
10:13:58 13 Q From hearsay?  
10:13:58 14 A Yeah.  
10:13:59 15 Q And who -- who told you that hearsay,  
10:13:59 16 if you --  
10:13:59 17 A I don't -- I don't recall.  
10:14:00 18 Q -- if you can recall?  
10:14:00 19 A I don't recall.  
10:14:01 20 Q So you had heard hearsay in the church  
10:14:02 21 that those were the three trustees, but you had no  
10:14:03 22 knowledge one way or the other?

10:14:05 1 A Right.  
10:14:05 2 Q Is it true that, in fact, you really  
10:14:07 3 don't know who the members of the board of  
10:14:09 4 trustees were prior to March 15th of 2009; is that  
10:14:16 5 true?  
10:14:16 6 A Only what I just told you, that  
10:14:20 7 William Meadows, Ann Wesley and  
10:14:24 8 Apostle Betty Peebles.  
10:14:27 9 Q But that's not based on any documents  
10:14:29 10 you reviewed --  
10:14:30 11 A But I haven't seen no document.  
10:14:32 12 Q That's only based on hearsay from  
10:14:34 13 someone whose name you cannot recall; is --  
10:14:37 14 A Right.  
10:14:38 15 Q -- that correct?  
10:14:39 16 A That's correct.  
10:14:39 17 Q All right. And with respect to  
10:14:40 18 Joel Peebles, you don't know one way or the other  
10:14:43 19 whether or not he was a trustee on or before or  
10:14:46 20 immediately before March 15th of 2009; isn't that  
10:14:50 21 correct?  
10:14:50 22 A Well, correct.

10:14:52 1 Q And you're not aware of any action  
10:14:54 2 taken by the board of trustees to remove  
10:14:57 3 Joel Peebles, Senior, as a member of the board of  
10:15:01 4 trustees in March of 2009; isn't that correct?  
10:15:06 5 A No.  
10:15:07 6 Q And you're not aware of any notice  
10:15:09 7 given to Joel Peebles of the reconstitution of the  
10:15:15 8 board in March of 2009; isn't that correct?  
10:15:20 9 A That's correct; I'm not aware of it.  
10:15:22 10 Q Was there an effort -- did  
10:15:23 11 Betty Peebles ever say anything to you about  
10:15:26 12 concealing this new board from Joel Peebles?  
10:15:30 13 A No.  
10:15:31 14 Q Was this new board ever announced to  
10:15:33 15 the congregation or to anyone else prior to the  
10:15:37 16 apostle's death?  
10:15:43 17 MR. MARKS: Objection; calls for  
10:15:45 18 speculation. There's no foundation that he knows.  
10:15:47 19 BY MR. MALONEY:  
10:15:48 20 Q Go ahead.  
10:15:50 21 MR. MARKS: You may answer if you know.

10:15:51 22

THE WITNESS: I'm not aware.

0072

10:15:52 1

BY MR. MALONEY:

10:15:53 2

Q Did you ever tell Joel Peebles that you

10:15:54 3

were a member of the board of trustees prior to

10:15:57 4

the death of the apostle?

10:16:01 5

A No.

10:16:02 6

Q Why not?

10:16:03 7

A Because he came to me and said that I

10:16:06 8

was on the illegal board, which is this board

10:16:10 9

here. He the one that said that.

10:16:12 10

Q When did that conversation take place?

10:16:14 11

A Well, right after he asked me for the

10:16:16 12

keys for the complex. Then he kept calling me,

10:16:18 13

and I would tell him that it's a board decision

10:16:23 14

not to give him the key, and he say, oh, that

10:16:26 15

illegal board that you on?

10:16:32 16

Q Uh-huh.

10:16:32 17

A How could you?

10:16:33 18

Q And when was this in relationship to

10:16:34 19

the apostle's death?

10:16:36 20

A This was after her death.

10:16:39 21

Q All right. So you had no discussion

10:16:41 22

with Joel about the board prior to the death of

0073

10:16:46 1

the apostle?

10:16:47 2

A No.

10:16:47 3

Q All right. Were you aware of the

10:16:49 4

correspondence in September of 2009 that Joel sent

10:16:54 5

about the governance of the church?

10:16:57 6

A Yes.

10:16:58 7

MR. MARKS: Objection.

10:16:58 8

BY MR. MALONEY:

10:16:58 9

Q What are you aware --

10:17:02 10

MR. MARKS: What document -- objection.

10:17:03 11

What document are you referring to, Counsel?

10:17:05 12

MR. MALONEY: I'm just asking him what

10:17:06 13

generally was he aware of with respect to the

10:17:09 14

correspondence from Joel Peebles in September of

10:17:11 15

2009. I want his recollection.

10:17:13 16

MR. MARKS: Objection. If you have the

10:17:14 17

document, show him.

10:17:16 18

MR. MALONEY: No, I want to know his

10:17:17 19

general recollection.

10:17:19 20 MR. MARKS: There's no document before  
10:17:20 21 him for him to recall. If you have the document,  
10:17:22 22 show him.

0074

10:17:23 1 BY MR. MALONEY:  
10:17:23 2 Q Do you recall any communications from  
10:17:24 3 Joel Peebles in September of 2009 concerning the  
10:17:27 4 issuance of governance at the church?  
10:17:39 5 A Yes, he send a -- a fax, fax letter.  
10:17:46 6 Q And what do you recall about that?  
10:17:54 7 A That he want the records.  
10:17:59 8 Q And did you recall -- how did you come  
10:18:01 9 to see that document?  
10:18:02 10 A He faxed it to me -- he FedEx'd to my  
10:18:06 11 house.  
10:18:07 12 Q To your house?  
10:18:08 13 A Yeah.  
10:18:09 14 Q Okay. And did you actually -- once you  
10:18:10 15 got that document and it was FedEx'd to your  
10:18:15 16 house, what is it that you did?  
10:18:16 17 A I didn't do anything.  
10:18:17 18 Q Okay. Did you talk to any other --  
10:18:19 19 anyone else at the church, anyone else on the  
10:18:23 20 board of trustees?  
10:18:24 21 A Yes, I did.  
10:18:25 22 Q I'm going to show you -- look at tab

0075

10:18:27 1 28. Is that the letter you're referring to?  
10:19:01 2 A Yes, I believe so.  
10:19:02 3 Q After you got that letter by FedEx,  
10:19:05 4 what, if anything, did you say or do?  
10:19:08 5 A Repeat your question.  
10:19:09 6 Q After you got that letter by FedEx,  
10:19:12 7 what, if anything, did you say or do?  
10:19:17 8 A I didn't do anything.  
10:19:20 9 Q Did you talk about it with anyone else  
10:19:22 10 who you believe was on the board of trustees?  
10:19:26 11 A No, I didn't.  
10:19:28 12 Q Did you have any role -- and I'll  
10:19:30 13 direct your attention to the response sent the  
10:19:34 14 next day, tab 29 -- or sent September 21st, tab  
10:19:38 15 29, by Dorothy Williams.  
10:19:40 16 Do you see that letter?  
10:19:42 17 A Uh-huh.

10:19:42 18 Q Did you have any role in reviewing or  
10:19:45 19 approving this letter to go out?  
10:19:50 20 A No.  
10:19:50 21 Q Were you aware even that this letter  
10:19:51 22 had gone out?

0076

10:19:51 1 A No, I wasn't at the time, no.  
10:19:52 2 Q When did you become aware this letter  
10:19:53 3 was sent out?  
10:19:55 4 A I guess a week or two afterwards.  
10:19:58 5 Q Are you aware of any meeting of the  
10:20:00 6 board of trustees being called to authorize this  
10:20:03 7 letter to be sent out?  
10:20:05 8 A No.  
10:20:05 9 Q The -- after you believed you became a  
10:20:08 10 trustee on March 15th of 2009, did the board ever  
10:20:15 11 meet prior to the apostle's death? Were there  
10:20:18 12 ever any meetings?  
10:20:19 13 A Yeah, we met several times.  
10:20:21 14 Q And where were those meetings?  
10:20:23 15 A They held at the church.  
10:20:24 16 Q Uh-huh. And were there notices given  
10:20:26 17 of the meeting?  
10:20:28 18 A Yeah.  
10:20:28 19 Q And what business was transacted at  
10:20:30 20 those meetings?  
10:20:32 21 A We would -- we would talk about the --  
10:20:39 22 the daily -- what we're going to do in the future

0077

10:20:43 1 on -- on the board, the daily operation of the  
10:20:46 2 church.  
10:20:49 3 Q How about the governance of the church?  
10:20:51 4 A Well, that would be the governance.  
10:20:53 5 Q Was the apostle present at these  
10:20:55 6 meetings?  
10:20:57 7 A She would -- she would talk to us by  
10:21:01 8 phone.  
10:21:02 9 Q And where would she be when she was  
10:21:03 10 making these phone calls to talk to you?  
10:21:06 11 A At home.  
10:21:07 12 Q And why was she not there in person?  
10:21:09 13 A Well, I guess some of the time she, you  
10:21:12 14 know, wasn't feeling good or -- or she just, you  
10:21:15 15 know, didn't want to come in.



10:21:16 16 Q Did there come a time when the apostle  
10:21:18 17 stopped coming to the church?  
10:21:20 18 A Yeah.  
10:21:21 19 Q When was that?  
10:21:29 20 A I believe it was -- it was September;  
10:21:31 21 September or October.  
10:21:36 22 Q Of what year?

0078

10:21:38 1 A Of '10 -- no, '09.  
10:21:50 2 Q And why was it that the apostle stopped  
10:21:54 3 coming to the church in September of '09?  
10:21:59 4 A Well, like -- like, she was beginning  
10:22:01 5 to -- she was ill.  
10:22:03 6 Q And was that noticeable to you?  
10:22:06 7 A Yeah.  
10:22:07 8 Q And what -- what was it about her  
10:22:09 9 appearance that caused you to believe that she was  
10:22:12 10 ill?  
10:22:14 11 A She had -- had lost some weight.  
10:22:18 12 Q Anything else?  
10:22:23 13 A That's about it.  
10:22:24 14 Q Did there come a time when the apostle  
10:22:26 15 was hospitalized?  
10:22:27 16 A Yeah.  
10:22:28 17 Q And when was that?  
10:22:38 18 A I guess in that -- I believe in -- in  
10:22:48 19 November of that year.  
10:22:51 20 Q Did you drive her to the hospital?  
10:22:53 21 A Yes, I did.  
10:22:53 22 Q And which hospital did you drive her

0079

10:22:55 1 to?  
10:22:56 2 A Sinai Hospital in Baltimore.  
10:22:57 3 Q Okay. And did you assist her in  
10:22:59 4 checking in under an assumed name?  
10:23:01 5 A No, I did not.  
10:23:05 6 Q Did she check in under an assumed name?  
10:23:08 7 A Yes, she did.  
10:23:09 8 Q What name was that?  
10:23:10 9 A Wooden (phonetics).  
10:23:10 10 Q And why did she check in under an  
10:23:12 11 assumed name, if you know?  
10:23:15 12 A Well, I can't assume.  
10:23:17 13 Q Well, did you ever get any information

10:23:19 14 or hear about why she was using --  
10:23:21 15 A I -- I never got it from her.  
10:23:23 16 Q Okay. Did you ever get it from anyone  
10:23:25 17 else?  
10:23:25 18 A No.  
10:23:26 19 Q So you have no idea whatsoever as to  
10:23:28 20 why she was using an assumed name?  
10:23:31 21 A Well, I would be assuming that she  
10:23:33 22 didn't -- didn't want --

0080

10:23:35 1 MR. MARKS: Don't assume.  
10:23:36 2 BY MR. MALONEY:  
10:23:37 3 Q What is it that you heard?  
10:23:38 4 A That she didn't want anyone to know  
10:23:40 5 that she was there.  
10:23:41 6 Q Did she ever tell you that she did not  
10:23:42 7 want her son, Joel Peebles, to know she was there?  
10:23:47 8 A Repeat the question.  
10:23:56 9 (The Record was read as requested.)  
10:23:57 10 THE WITNESS: Yes.  
10:23:57 11 BY MR. MALONEY:  
10:23:58 12 Q When did she tell you that?  
10:24:02 13 A Prior to the -- the date that she was  
10:24:06 14 in there.  
10:24:07 15 Q Was this at her house or on the way to  
10:24:09 16 the hospital or what?  
10:24:10 17 A At the hospital.  
10:24:10 18 Q And what is it that she said to you?  
10:24:12 19 A She said she didn't want anyone --  
10:24:15 20 anyone to know. She don't even want Joel to know.  
10:24:18 21 Q So she -- did she mention Joel by name?  
10:24:21 22 A Yeah.

0081

10:24:21 1 Q So she said, I don't want anyone, not  
10:24:24 2 even my son, to know?  
10:24:25 3 A Right.  
10:24:26 4 Q And so she wanted it completely secret  
10:24:28 5 that she was there; is that correct?  
10:24:30 6 A Yep.  
10:24:31 7 Q Is that a yes?  
10:24:32 8 A Yes.  
10:24:32 9 Q And did you honor her request?  
10:24:34 10 A I sure did.  
10:24:34 11 Q How long was she -- and which hospital

10:24:38 12 was this, if you know?  
10:24:39 13 A Sinai.  
10:24:39 14 Q And how long was she at Sinai?  
10:24:54 15 A Think to January -- January, I think,  
10:25:04 16 January 10th -- January 10.  
10:25:09 17 Q And how often did you come to see her  
10:25:10 18 at Sinai?  
10:25:16 19 A Maybe two or three times a week.  
10:25:17 20 Q And who else came to see her that  
10:25:19 21 you're aware of?  
10:25:20 22 A Denise Killen.

0082

10:25:24 1 Q Anyone else?  
10:25:25 2 A And Zane; Zane was there.  
10:25:28 3 Q Uh-huh. Anyone else?  
10:25:37 4 A Dr. Freeman.  
10:25:42 5 Q And who was Dr. Freeman?  
10:25:44 6 A Or Minister Freeman, D.D. Freeman.  
10:25:49 7 Q Were you -- and what was she being  
10:25:50 8 treated for at Sinai, if you know?  
10:25:52 9 A I don't know.  
10:25:53 10 Q Were you concerned that because of her  
10:25:54 11 condition, she was not going to get out of Sinai?  
10:25:57 12 A No, I -- I knew that she was going to  
10:25:58 13 get out because I had --  
10:25:59 14 Q How did you know?  
10:26:00 15 A -- because I had prayed, and God had  
10:26:03 16 said that she was going to be released from there.  
10:26:09 17 Q So based on God's word to you, you  
10:26:09 18 believed she would get out?  
10:26:10 19 A Yes.  
10:26:10 20 Q And she, in fact, did get out, right?  
10:26:11 21 A Yes, she did.  
10:26:13 22 Q And when did she get out of Sinai;

0083

10:26:15 1 January?  
10:26:16 2 A I want to say January -- January, and  
10:26:22 3 then she went across the street.  
10:26:25 4 Q To the rehab facility?  
10:26:27 5 A To the rehab center.  
10:26:28 6 Q Uh-huh. And how long was she in the  
10:26:29 7 rehab center?  
10:26:30 8 A She wasn't in there long, very long.  
10:26:32 9 Q Uh-huh. And after she was discharged

10:26:33 10 from the rehab center, where did she go?  
10:26:36 11 A Home.  
10:26:36 12 Q Uh-huh. How long was she home for?  
10:26:44 13 A I guess off and on to her death.  
10:26:47 14 Q And when you say "off and on," she  
10:26:49 15 would leave her home when she was to be  
10:26:51 16 hospitalized --  
10:26:52 17 A Right.  
10:26:52 18 Q -- is that correct?  
10:26:53 19 But she was never -- she never returned  
10:26:56 20 to the church prior to her death; correct?  
10:26:58 21 A No.  
10:26:58 22 Q And with respect to the other

0084

10:27:01 1 hospitalizations, which other hospitals did she go  
10:27:04 2 to that you're aware of?  
10:27:06 3 A She -- I think, Northwestern Hospital.  
10:27:09 4 I think that's the name of it. That's where she  
10:27:12 5 passed away.  
10:27:13 6 Q At Northwestern?  
10:27:14 7 A I believe that's the name of it.  
10:27:16 8 Q Northwestern in Baltimore?  
10:27:17 9 A Yeah.  
10:27:17 10 Q Okay. And you -- you believe that's  
10:27:19 11 where she was at the time of her death?  
10:27:20 12 A Yeah.  
10:27:21 13 Q And for the rest of 2009, going into  
10:27:26 14 2010, and during the calendar year 2010, how often  
10:27:31 15 did you see Apostle Peebles?  
10:27:34 16 A You mean while she was hospitalized?  
10:27:37 17 Q Even after she was hos -- discharged  
10:27:38 18 from Sinai and then went home and then would  
10:27:41 19 occasionally come back to hospitals, how often  
10:27:44 20 would you see her?  
10:27:46 21 A Whenever she would call me to come  
10:27:48 22 over, and whenever they were going to take her

0085

10:27:52 1 back to the hospital.  
10:27:53 2 Q And how often was that?  
10:27:55 3 A Once or twice a week.  
10:27:56 4 Q And would you be the person who would  
10:27:58 5 drive her back to the hospital on those occasions?  
10:28:01 6 A Well, the ambulance do it -- would take  
10:28:05 7 her to the hospital from that time.

10:28:06 8 Q Uh-huh. And was there an ambulance  
10:28:07 9 service that was called?  
10:28:10 10 A Yes.  
10:28:10 11 Q And what was that?  
10:28:11 12 A I don't know the name of it.  
10:28:12 13 Q Why was the ambulance service called  
10:28:13 14 rather than having you take her to the hospital?  
10:28:16 15 A Well, I guess it would be much easier  
10:28:18 16 for her and more comfortable for her.  
10:28:20 17 Q Uh-huh. Was her condition continuing  
10:28:22 18 to worsen?  
10:28:25 19 A I believe so.  
10:28:25 20 Q And how so?  
10:28:28 21 A Well, she needed blood transfusion.  
10:28:37 22 Q And what else?

0086

10:28:38 1 A That's all I can --  
10:28:38 2 Q Uh-huh.  
10:28:38 3 A -- you know, recall that I'm aware of.  
10:28:40 4 Q And besides losing weight throughout  
10:28:43 5 2010, what, if anything, did you observe about  
10:28:45 6 changes in her physical appearance?  
10:28:54 7 A Well, her hair got whiter --  
10:28:59 8 Q Uh-huh.  
10:28:59 9 A -- and she was still talkable, you  
10:29:02 10 know, still had plenty, you know, wisdom.  
10:29:06 11 Q Uh-huh. Anything else?  
10:29:08 12 A And that's about all.  
10:29:09 13 Q Did there ever come a time when she  
10:29:11 14 appeared to lose some of her mental acuity? In  
10:29:14 15 other words, did not appear to be expressing  
10:29:18 16 herself as clearly as she had been before?  
10:29:21 17 A Well, when she took the medication, she  
10:29:24 18 would -- she would be that way because -- you  
10:29:27 19 know, with the medication, but other than that,  
10:29:30 20 when she's not on the medication, she was fine.  
10:29:32 21 Q So you believe that when she was not on  
10:29:33 22 the medication that she appeared to be just like

0087

10:29:35 1 the old apostle?  
10:29:37 2 A Yes.  
10:29:37 3 Q But when she was on the medication, it  
10:29:39 4 was different?  
10:29:40 5 A Yeah.

10:29:40 6 Q And how was that? How was she  
10:29:42 7 different?  
10:29:44 8 A I believe the med -- I'm not a  
10:29:46 9 doctor --  
10:29:46 10 Q Right.  
10:29:46 11 A -- so I couldn't say. I just think --  
10:29:48 12 Q Well, I'm just asking you what you  
10:29:50 13 observed that was different about her demeanor,  
10:29:52 14 appearance or expression when she was on the  
10:29:57 15 medication.  
10:29:58 16 A I mean, she knew me, and she would talk  
10:29:59 17 to me, but she would make my visit very short, a  
10:30:06 18 minute or two, and she would say, well, I'm going  
10:30:10 19 to sleep --  
10:30:10 20 Q So she appeared --  
10:30:10 21 A -- and that's not usually her. She  
10:30:12 22 usually talk a lot to me, want to know the daily

0088

10:30:15 1 operation at the church.  
10:30:17 2 Q So she appeared to be drowsy or  
10:30:19 3 exhausted?  
10:30:20 4 A Drowsy.  
10:30:20 5 Q Okay. And she did not appear to be  
10:30:22 6 able to have prolonged conversations when she was  
10:30:24 7 on the medication?  
10:30:25 8 A When she was on the --  
10:30:27 9 MR. MARKS: Objection to the  
10:30:28 10 characterization that she wasn't able to have  
10:30:31 11 prolonged characterizations. That was not the  
10:30:33 12 testimony.  
10:30:33 13 BY MR. MALONEY:  
10:30:33 14 Q Go ahead. I'm asking you the question.  
10:30:35 15 I'm asking was she able to have prolonged  
10:30:38 16 conversations when she was on the medication?  
10:30:39 17 A Well, like I said before, her -- she  
10:30:42 18 would be sleeping, and she wouldn't want to go to  
10:30:46 19 sleep.  
10:30:46 20 Q Okay. And that would prevent her from  
10:30:48 21 having prolonged conversations?  
10:30:51 22 MR. MARKS: If she was sleeping,

0089

10:30:53 1 probably.  
10:30:54 2 MR. MALONEY: Let's have the witness  
10:30:56 3 testify and not counsel here.

10:30:57 4 MR. MARKS: Well, your question is --  
10:30:58 5 is kind of getting far afield here.  
10:31:01 6 MR. MALONEY: No, it's not far. It's  
10:31:06 7 right in the middle of the field.  
10:31:07 8 BY MR. MALONEY:  
10:31:07 9 Q And I'm asking you, did she -- go  
10:31:08 10 ahead.  
10:31:08 11 A I believe the medication made her  
10:31:10 12 sleepy.  
10:31:11 13 Q Uh-huh.  
10:31:11 14 A That's the reason why she wouldn't have  
10:31:12 15 a long conversation with me.  
10:31:14 16 Q Okay. What medication are you  
10:31:15 17 referring to?  
10:31:16 18 A I -- I couldn't tell you. I --  
10:31:17 19 (witness shakes head.)  
10:31:20 20 Q Did you have any role in administering  
10:31:21 21 the medication to her?  
10:31:22 22 A None at all.

0090

10:31:23 1 Q Who would do that?  
10:31:24 2 A She had a visiting nurse there.  
10:31:28 3 Q Do you remember that person's name?  
10:31:30 4 A No, I don't.  
10:31:31 5 Q Do you remember the name of the agency  
10:31:32 6 that the visiting nurse worked with?  
10:31:33 7 A No.  
10:31:34 8 Q Did anyone else other than the visiting  
10:31:36 9 nurse administer medication to her?  
10:31:38 10 A Not I'm aware of.  
10:31:39 11 Q Did she, during 2009 or 2010, ever  
10:31:43 12 discuss with you in any way her son, Joel Peebles,  
10:31:49 13 Senior?  
10:31:50 14 A In what way?  
10:31:52 15 Q In any way. His name ever come up?  
10:31:54 16 You've told us one occasion when she said, I don't  
10:31:57 17 want anyone to visit me at the hospital, even my  
10:32:00 18 son, Joel.  
10:32:01 19 I'm asking other than that, at any time  
10:32:03 20 in 2009 or 2010, did the apostle ever discuss or  
10:32:07 21 bring up her son, Joel?  
10:32:09 22 A Yeah.

0091

10:32:09 1 Q Tell me what you recall.

10:32:11 2 A She would say that he keep on insisting  
10:32:14 3 when she didn't want him to -- to visit her, and  
10:32:19 4 she would tell him that she didn't want him. He  
10:32:22 5 would come and ring the doorbell constantly, and  
10:32:30 6 when it was no answer, he would go around to  
10:32:32 7 the -- to the -- to her bedroom window and sliding  
10:32:35 8 door and bang on that.  
10:32:37 9 Q Okay. Anything else?  
10:32:42 10 A That's -- that's about it.  
10:32:52 11 Q So other than saying that she didn't  
10:32:56 12 want visits from him on some occasions, did she  
10:32:59 13 ever discuss with you in any way her son,  
10:33:03 14 Joel Peebles, Senior?  
10:33:09 15 A Repeat that question again.  
10:33:12 16 MR. MALONEY: Go ahead and read it  
10:33:13 17 back.  
10:33:13 18 (The Record was read as requested.)  
10:33:32 19 THE WITNESS: At what time?  
10:33:33 20 BY MR. MALONEY:  
10:33:33 21 Q At any time during the two years prior  
10:33:34 22 to her death.

0092

10:33:44 1 A At any time prior to her death.  
10:33:48 2 MR. MARKS: Two years prior to her  
10:33:49 3 death.  
10:33:49 4 BY MR. MALONEY:  
10:33:50 5 Q Right.  
10:33:54 6 A So that would be the -- the -- two  
10:33:58 7 years prior to her death?  
10:34:01 8 Q Yes.  
10:34:04 9 A That would be eight -- eight, seven --  
10:34:11 10 Q All the way up to October 12th, 2010.  
10:34:14 11 A I didn't hear that.  
10:34:15 12 Q All the way up to October the 12th of  
10:34:17 13 2010.  
10:34:19 14 A Any time before that?  
10:34:20 15 Q Yes.  
10:34:21 16 A Oh, yeah, she discussed a lot of things  
10:34:26 17 to me.  
10:34:27 18 Q About Joel?  
10:34:27 19 A Yeah.  
10:34:27 20 Q Tell me what they are.  
10:34:28 21 A Well, there was a time that she  
10:34:29 22 discussed with me that Joel and Bobby Henry



10:34:36 1 purchased a -- a Explorer, Ford truck --  
10:34:45 2 Q Uh-huh.  
10:34:44 3 A -- at Lanham Ford without her -- her  
10:34:46 4 approval --  
10:34:48 5 Q Uh-huh.  
10:34:48 6 A -- and that when the bill came to the  
10:34:50 7 church, she wasn't aware of it, and she was so  
10:34:53 8 upset about it.  
10:34:55 9 Q Uh-huh. Anything else?  
10:35:02 10 A That in 2001, unauthoroo -- un --  
10:35:10 11 unauthorized use of the -- the credit card from  
10:35:16 12 Sam Club --  
10:35:19 13 Q Uh-huh.  
10:35:18 14 A -- that he charged over \$25,000 without  
10:35:21 15 her approval.  
10:35:21 16 Q Anything else?  
10:35:23 17 A And that -- yeah, there is a couple  
10:35:30 18 more. Give me a second.  
10:35:39 19 She showed me a bank statement that  
10:35:43 20 they had a joint account at Bank of America, and  
10:35:50 21 he withdrew 25,000 without her approval, and she  
10:35:59 22 was so upset about that, and she said that I can't

10:36:01 1 trust him anymore.  
10:36:03 2 Q Anything else?  
10:36:04 3 A That's all I can recall.  
10:36:05 4 Q Did she ever discuss with you  
10:36:07 5 Joel Peebles' fitness to preach from the pulpit,  
10:36:14 6 whether he was a good or bad preacher or how he  
10:36:19 7 was doing or --  
10:36:19 8 A Well, she would always say that he lies  
10:36:22 9 a lot.  
10:36:22 10 Q When did she say that?  
10:36:24 11 A Oh, many times --  
10:36:25 12 Q Uh-huh.  
10:36:25 13 A -- many times. She would say he's good  
10:36:28 14 for gab.  
10:36:29 15 Q Good for what?  
10:36:33 16 A Good for gab.  
10:36:34 17 Q Gab?  
10:36:34 18 A Yeah.  
10:36:34 19 Q G-A-B?  
10:36:35 20 A Yeah.  
10:36:36 21 Q Okay. And do you recall when she said

10:36:37 22 that?

0095

10:36:37 1 A Oh, quite often.

10:36:38 2 Q Did she ever say anything to you about  
10:36:41 3 his fitness to lead the church?

10:36:43 4 A Well, she felt that he needs training.  
10:36:48 5 She -- she wants it -- she wanted him to preach,  
10:36:51 6 but she felt that he needs some training.

10:36:53 7 Q So she wanted him to lead the church,  
10:36:57 8 but felt he needed more tutelage?

10:36:58 9 A He needs --

10:37:00 10 MR. MARKS: Objection; that's a  
10:37:01 11 mischaracterization of the testimony.

10:37:04 12 BY MR. MALONEY:

10:37:04 13 Q Go ahead. I'm asking you.

10:37:06 14 MR. MARKS: Asking -- what was the  
10:37:07 15 question?

10:37:07 16 BY MR. MALONEY:

10:37:07 17 Q So she felt he should lead the church  
10:37:13 18 but he would need more tutelage first?

10:37:15 19 A That he would -- that she would have  
10:37:17 20 him -- she wouldn't mind him preaching --

10:37:19 21 Q Uh-huh.

10:37:19 22 A -- but not to run the administration

0096

10:37:20 1 side of the church.

10:37:22 2 Q When did she say that to you?

10:37:24 3 A Quite often.

10:37:24 4 Q Did she say who she wanted to run the  
10:37:26 5 administration side of the church?

10:37:28 6 A No. At the time when she said that,  
10:37:29 7 then that's -- no.

10:37:31 8 Q When was that -- when she made that  
10:37:34 9 statement to you, how far was that prior to her  
10:37:39 10 death?

10:37:39 11 A Oh, a lot of time. A couple years,  
10:37:43 12 months.

10:37:44 13 Q How, if you know, did the provision  
10:37:46 14 come to be in the will that would create the  
10:37:49 15 precondition that Joel Peebles obtain, quote,  
10:37:52 16 tutelage, unquote?

10:37:55 17 MR. MARKS: Objection. There's no  
10:37:57 18 foundation that this deponent has any knowledge of  
10:38:01 19 that.

10:38:01 20 But to the extent that you do, you may  
10:38:03 21 answer.  
10:38:03 22 BY MR. MALONEY:

0097

10:38:04 1 Q Go ahead.  
10:38:05 2 A I don't know anything about that.  
10:38:06 3 Q Sis -- sitting here today, is this the  
10:38:08 4 first time you have heard about a provision in the  
10:38:10 5 will that would require Joel Peebles to obtain  
10:38:13 6 tutelage?  
10:38:15 7 A First time today.  
10:38:16 8 Q Do you know what tutelage is?  
10:38:18 9 A Yeah.  
10:38:19 10 Q What is it?  
10:38:20 11 A You -- you teach someone.  
10:38:21 12 Q All right. You've never heard or been  
10:38:23 13 aware in any way that there was such a provision  
10:38:26 14 in the will?  
10:38:27 15 A No.  
10:38:28 16 Q When did Betty Peebles sign her last  
10:38:31 17 will, if you know?  
10:38:32 18 A I'm not aware of it.  
10:38:33 19 Q What do you know about the  
10:38:34 20 circumstances under which she signed any of her  
10:38:36 21 wills?  
10:38:37 22 A I'm not --

0098

10:38:39 1 MR. MARKS: Objection; foundation.  
10:38:41 2 You may answer if you know.  
10:38:43 3 THE WITNESS: I'm not aware of it.  
10:38:44 4 BY MR. MALONEY:  
10:38:44 5 Q Did you inherit anything in any of the  
10:38:47 6 wills?  
10:38:47 7 A Yes.  
10:38:47 8 Q And what did you get?  
10:38:48 9 A The automobile and some money.  
10:38:51 10 Q And which automobile was that?  
10:38:52 11 A Her Mercedes.  
10:38:53 12 Q All right. And are you driving that  
10:38:55 13 Mercedes now?  
10:38:56 14 A No, I'm not.  
10:38:57 15 Q All right. How come?  
10:38:58 16 A Well, it's still at the house.  
10:38:59 17 Q All right. Is it just sitting there,

10:39:01 18 not -- not driven?  
10:39:03 19 A Right.  
10:39:03 20 Q And how much money did you get?  
10:39:05 21 A 15,000.  
10:39:05 22 Q And has that money been distributed to

0099

10:39:07 1 you?  
10:39:08 2 A Yes.  
10:39:08 3 Q When was that money distributed to you?  
10:39:17 4 A Maybe a month ago.  
10:39:17 5 Q All right. Were you aware -- is there  
10:39:19 6 any reason why you're not -- the Mercedes has not  
10:39:21 7 been given to you that you're aware of?  
10:39:24 8 A It's just that I hadn't put the title  
10:39:25 9 on it yet.  
10:39:27 10 Q All right. So all it's waiting is for  
10:39:29 11 you to transfer title; is that correct?  
10:39:31 12 A Right. That's correct.  
10:39:31 13 Q So you're planning to drive the  
10:39:32 14 Mercedes, then, and to own it?  
10:39:35 15 A Yes.  
10:39:35 16 Q And were you surprised to find that you  
10:39:37 17 were named in the will?  
10:39:38 18 A Yes.  
10:39:38 19 Q Did you have any idea prior to that  
10:39:40 20 that you were named in the will?  
10:39:41 21 A No.  
10:39:41 22 Q When you made the statement earlier

0100

10:39:43 1 today that Betty Peebles was the board of  
10:39:49 2 trustees, what did you mean by that?  
10:39:50 3 A Well, she pretty much governed things.  
10:39:54 4 Q Are you saying that as a matter of law,  
10:39:55 5 that as you -- what you were aware of, that, in  
10:39:59 6 fact, she was the only trustee, or are you just  
10:40:02 7 saying she was a powerful influence in the church?  
10:40:05 8 A She's -- she was both.  
10:40:06 9 Q So she was the only trustee as far as  
10:40:09 10 you know?  
10:40:10 11 A No, I said earlier that Ann Wesley and  
10:40:17 12 William Meadow (sic).  
10:40:19 13 Q Why did you exclude Joel Peebles from  
10:40:22 14 that list?  
10:40:24 15 A Because I wasn't aware that he was on

10:40:25 16 the board.  
10:40:27 17 Q Well, were you aware of Ann Wesley or  
10:40:30 18 William Meadows ever being elected to the board?  
10:40:33 19 A No.  
10:40:34 20 Q How is their status different in any  
10:40:36 21 way from Joel Peebles that you're aware of?  
10:40:41 22 A Because they from the original found --

0101

10:40:46 1 founders of the church.  
10:40:48 2 Q And did you ever attend a meeting of  
10:40:50 3 the board of trustees?  
10:40:53 4 MR. MARKS: At which point are we  
10:40:55 5 talking?  
10:40:55 6 BY MR. MALONEY:  
10:40:56 7 Q Prior to March 15th, 2009.  
10:40:58 8 A No.  
10:40:58 9 Q Were you aware of any meetings of the  
10:41:00 10 board of trustees being called in March -- prior  
10:41:02 11 to March 15th of 2009?  
10:41:07 12 A Was I aware of what board?  
10:41:09 13 Q Any meetings of the board of trustees  
10:41:11 14 being called prior to March 15th --  
10:41:13 15 A No.  
10:41:13 16 Q -- of 2009?  
10:41:15 17 When you say that Wesley, and -- and  
10:41:18 18 Williams and the apostle were the founders, what  
10:41:21 19 do you base that on? What knowledge do you have  
10:41:23 20 about that?  
10:41:24 21 A Pastor often said all the time, even  
10:41:28 22 from the pulpit.

0102

10:41:30 1 Q That what?  
10:41:31 2 A That these were the founders of the  
10:41:33 3 church, right along with her husband.  
10:41:35 4 Q Well, when she said they were the  
10:41:37 5 founders, did she say they were the founding  
10:41:39 6 trustees or just the people that started the  
10:41:41 7 church?  
10:41:41 8 A I think she might have said it a couple  
10:41:43 9 times, yes.  
10:41:44 10 Q Said what?  
10:41:45 11 A That these were founding trustees.  
10:41:47 12 Q Okay. The -- with respect to the  
10:41:49 13 business about the Explorer truck, when did all

10:41:53 14 that take place?  
10:41:55 15 A I don't know. I -- I can't say. The  
10:41:59 16 truck is still there.  
10:42:00 17 Q Well, when you say, "the truck is still  
10:42:02 18 there" --  
10:42:03 19 A Still parking on the church lot.  
10:42:05 20 Q And what has the truck been used for?  
10:42:08 21 A Not using for anything. It belongs to  
10:42:10 22 Joel Peebles.

0103

10:42:11 1 Q All right. So, in other words, it's  
10:42:13 2 a -- you're referring to the truck that he drives?  
10:42:18 3 A No, the truck that -- that was  
10:42:19 4 unauthorized purchase.  
10:42:20 5 Q And when did this so-called  
10:42:24 6 unauthorized purchase take place?  
10:42:27 7 A She didn't give me a date.  
10:42:29 8 Q Well, how many years ago did she  
10:42:31 9 complain about this? Was this --  
10:42:32 10 A Four or five years.  
10:42:33 11 Q This is four or five years prior to her  
10:42:34 12 death?  
10:42:35 13 A Yeah.  
10:42:36 14 Q All right. And how was Bobby Henry  
10:42:38 15 involved in this?  
10:42:39 16 A Well, she said Bobby Henry and  
10:42:41 17 Joel Peebles went to Lanham Ford --  
10:42:45 18 Q Uh-huh.  
10:42:45 19 A -- to purchase it, and that they came  
10:42:51 20 into the financial office. Dorothy Williams  
10:42:56 21 brought it to the pastor's attention, and she was  
10:42:59 22 a -- she was, you know, upset about it, and she

0104

10:43:02 1 made him write a promissory note to pay it off.  
10:43:06 2 Q Made who write a promissory note?  
10:43:08 3 A Joey.  
10:43:09 4 Q Were you aware that, in fact,  
10:43:10 5 Betty Peebles actually signed for the truck  
10:43:13 6 herself and paid for it herself; are you aware of  
10:43:16 7 that?  
10:43:16 8 A That's not what she told me; no, I'm  
10:43:18 9 not aware of that.  
10:43:20 10 Q Have you ever seen any documents with  
10:43:21 11 respect to the truck?

10:43:22 12 A No.  
10:43:22 13 Q You ever aware of her requiring the  
10:43:26 14 truck to be returned?  
10:43:27 15 A No.  
10:43:28 16 Q Are you aware personally of anything  
10:43:29 17 that Bobby Henry did or did not do with respect to  
10:43:32 18 the Explorer truck?  
10:43:35 19 A No.  
10:43:35 20 Q With respect to the \$25,000 unauthor --  
10:43:36 21 so-called unauthorized withdrawal from the Bank of  
10:43:40 22 America, when did all that take place, if you

0105

10:43:43 1 know?  
10:43:45 2 A No, I don't know. I -- I be  
10:43:49 3 speculating. But she showed me the bank  
10:43:52 4 statement. She held it up just like this  
10:43:54 5 (indicating) --  
10:43:55 6 Q Uh-huh.  
10:43:55 7 A -- and said, Jack, he took \$25,000 out  
10:44:00 8 of this joint account that I had for -- for him  
10:44:03 9 and I. And she was crying. She was upset. And  
10:44:07 10 she said, I can't ever trust him.  
10:44:09 11 Q And how many years was this -- how many  
10:44:11 12 years ago prior to her death was this?  
10:44:15 13 A Maybe three -- three to four years,  
10:44:18 14 maybe. I don't -- that I can recall.  
10:44:20 15 Q Do you know anything about the source  
10:44:21 16 of funds in the joint account?  
10:44:22 17 A No.  
10:44:23 18 Q Do you have any personal knowledge  
10:44:24 19 about the withdrawal itself, other than what she  
10:44:26 20 told you?  
10:44:27 21 A No.  
10:44:28 22 Q Are you aware of a connection between

0106

10:44:30 1 the -- are you aware of the reason that the  
10:44:33 2 withdrawal took place?  
10:44:34 3 A No.  
10:44:35 4 Q Did you ever discuss this with  
10:44:36 5 Joel Peebles, Senior?  
10:44:39 6 A No.  
10:44:40 7 Q Do you have any personal knowledge  
10:44:41 8 whatsoever about this transaction?  
10:44:42 9 A No.

10:44:43 10 Q All right. With respect to the 2001  
10:44:45 11 unauthorized use of a credit card that you claim  
10:44:48 12 she talked to you about with respect to Sam's  
10:44:54 13 Club, what was that all about?  
10:44:55 14 A She had said what happened was that one  
10:44:57 15 of the employee did some investigation and found  
10:45:07 16 out that Joel Peebles and his wife, Elanda  
10:45:13 17 (phonetics) Peebles, had purchased un -- up to  
10:45:19 18 \$25,000 worth of merchandise for their own  
10:45:22 19 personal use, and some of the items were  
10:45:30 20 jewelry, a trampoline -- trampoline, clothes.  
10:45:35 21 Q Did all this occur in 2009?  
10:45:37 22 A 2001.

0107

10:45:38 1 Q 2001, rather?  
10:45:39 2 A Well, I wouldn't say -- it was up to  
10:45:42 3 2001.  
10:45:43 4 Q All right. So this is prior to 2001;  
10:45:45 5 is that correct?  
10:45:45 6 A Right. And that she took the card away  
10:45:50 7 from him, from the both of them, and made me the  
10:45:54 8 primary card holder for Sam Club.  
10:45:58 9 Q Do you --  
10:45:59 10 MR. MARKS: Mr. Maloney, let me just  
10:46:00 11 ask if we could take a break. I don't want to  
10:46:03 12 interrupt your line of questioning. When you --  
10:46:05 13 if you want to finish your line of questioning, if  
10:46:08 14 this might be a good time to take just a quick  
10:46:09 15 break.  
10:46:13 16 MR. MALONEY: Let's do another five,  
10:46:14 17 ten minutes, and then we'll take a break.  
10:46:14 18 BY MR. MALONEY:  
10:46:15 19 Q How did you learn about all this?  
10:46:17 20 A She told me.  
10:46:18 21 Q Was any of the materials that were  
10:46:18 22 purchased at Sam's Club used at the Academy, at

0108

10:46:22 1 the Jericho Christian Academy?  
10:46:23 2 A I'm not aware.  
10:46:25 3 Q Are you aware what -- what happened to  
10:46:26 4 the items and materials that were purchased at the  
10:46:29 5 Jeri -- at the Sam's Club?  
10:46:31 6 A Was I what now?  
10:46:32 7 Q Were you aware of what happened to any



10:46:33 8 of the items that were used?  
10:46:35 9 A No.  
10:46:35 10 Q You don't have any personal knowledge  
10:46:37 11 about that?  
10:46:37 12 A I'm just going by what she said.  
10:46:38 13 Q All right. Are you aware of anything  
10:46:40 14 being returned to Sam's Club or any of the items  
10:46:43 15 recovered?  
10:46:43 16 A No. No, I'm not aware.  
10:46:45 17 Q Did you ever discuss any of this with  
10:46:46 18 Joel Peebles at all?  
10:46:47 19 A No, I didn't.  
10:46:48 20 Q Do you have any personal knowledge  
10:46:49 21 yourself about the Sam's Club purchases?  
10:46:52 22 A No.

0109

10:46:52 1 Q The -- with respect to Joel Peebles and  
10:46:55 2 with respect to the leadership of the church, who  
10:46:57 3 is the leader of the church right now?  
10:47:02 4 A This board here.  
10:47:04 5 Q Uh-huh. And is there a permanent  
10:47:05 6 pastor has been selected?  
10:47:07 7 A No, it's not.  
10:47:08 8 Q What is happening with the permanent  
10:47:10 9 pastor?  
10:47:11 10 A We -- the board right now -- the church  
10:47:13 11 is in -- in a year of -- of mourning.  
10:47:16 12 Q And at the end of the year of mourning,  
10:47:20 13 what is the plan?  
10:47:20 14 A Plan is that -- that we would choose a  
10:47:25 15 pastor.  
10:47:26 16 Q And is Joel Peebles a candidate for  
10:47:28 17 that position?  
10:47:29 18 A Well, that's a board decision.  
10:47:31 19 Q I understand that. That's why I'm  
10:47:32 20 asking you.  
10:47:33 21 A Yeah.  
10:47:33 22 Q And why is he a candidate for the

0110

10:47:36 1 position?  
10:47:36 2 A Well, I mean, he's preaching now.  
10:47:39 3 Q And what kind of job is he doing  
10:47:41 4 preaching now?  
10:47:44 5 A He's doing a pretty good job.

10:47:46 6 Q And why do you say that?  
10:47:47 7 A Well, he'll go -- he'll preach, and  
10:47:52 8 then he'll go off and he's talking about his wife  
10:47:55 9 and he talks about sex.  
10:47:58 10 Q Uh-huh.  
10:47:58 11 A You know. And it kind of turns -- you  
10:48:03 12 know, turns me off --  
10:48:04 13 Q Uh-huh.  
10:48:04 14 A -- and it has turned a lot of people  
10:48:07 15 who complain about it.  
10:48:09 16 Q Uh-huh. Do you actually come to the  
10:48:11 17 service?  
10:48:11 18 A The eight o'clock service?  
10:48:13 19 Q Any service.  
10:48:14 20 A Eleven o'clock.  
10:48:15 21 Q Are you a regular attendee of the  
10:48:18 22 eleven o'clock, or you come from time to time?

0111

10:48:21 1 A I'm a regular, but, you know, my duties  
10:48:23 2 sometime pull me out.  
10:48:24 3 Q And what duties are those?  
10:48:25 4 A Well, security or picking up the  
10:48:29 5 offering.  
10:48:30 6 Q So it's accurate that often you're not  
10:48:32 7 actually in the church during the service because  
10:48:34 8 you're performing duties outside the church?  
10:48:37 9 A Sometime, and then -- but I get the --  
10:48:40 10 the CD.  
10:48:41 11 Q So you get the CD and you listen to it?  
10:48:44 12 A And listen to it, you know.  
10:48:46 13 Q Do you do that every -- every Sunday?  
10:48:48 14 A Mostly every Sunday.  
10:48:50 15 Q All right. So you listen to his  
10:48:51 16 preaching if you don't get --  
10:48:53 17 A (Witness nods head.)  
10:48:54 18 Q Why do you get the CD to listen to his  
10:48:56 19 preaching?  
10:48:56 20 A Well, I mean, I gotta be -- I feel that  
10:48:57 21 I need to be -- get fed.  
10:48:59 22 Q Uh-huh. You mean --

0112

10:48:59 1 A There's some --  
10:48:59 2 Q -- spiritually?  
10:49:00 3 A -- message in there, something for me.

10:49:03 4 Q You mean that's spiritually fed?  
10:49:05 5 A Yeah.  
10:49:05 6 Q And do you find it spiritually  
10:49:06 7 enriching to listen to CDs of him?  
10:49:10 8 A Sometime.  
10:49:10 9 Q Yes. And do you know of any reason why  
10:49:12 10 Joel Peebles would not be an appropriate pastor?  
10:49:18 11 MR. MARKS: Objection; no foundation on  
10:49:19 12 that; calls for speculation.  
10:49:21 13 You may answer if you know.  
10:49:22 14 BY MR. MALONEY:  
10:49:22 15 Q Go ahead. Go ahead.  
10:49:24 16 A It would be a board decision.  
10:49:25 17 Q Uh-huh. I understand that it's a board  
10:49:27 18 decision, but I'm asking you individually, as  
10:49:29 19 someone who claims to be a member of the board of  
10:49:31 20 trustees and who claims to be involved in the  
10:49:32 21 leadership of the church.  
10:49:35 22 Are you, yourself, aware of any reason

0113

10:49:37 1 why Joel Peebles would not be an appropriate  
10:49:43 2 pastor of the church?  
10:49:44 3 A If he gets more training.  
10:49:45 4 Q And what training do you believe he  
10:49:45 5 needs?  
10:49:45 6 A Training in -- in -- I guess go to  
10:49:50 7 school, divinity school or some training.  
10:49:53 8 Q So you believe he needs more divinity  
10:49:56 9 school or some training?  
10:49:57 10 A Yeah.  
10:49:57 11 Q And what causes you to believe this?  
10:49:59 12 A Well, just like I say, he -- he would  
10:50:01 13 preach and -- and then he'll go off on another  
10:50:04 14 subject.  
10:50:05 15 Q All right.  
10:50:06 16 A He go off to his -- you know, how  
10:50:09 17 beautiful his wife is and -- and not stay with,  
10:50:11 18 and then he kind of lose it.  
10:50:14 19 Q So you believe he should stop referring  
10:50:16 20 to his wife during the -- from the pulpit?  
10:50:19 21 A Well, I think he should stay with the  
10:50:21 22 message.

0114

10:50:22 1 Q Okay. Other than referring to his

10:50:23 2 wife, is there anything else that causes you to  
10:50:25 3 believe that he needs more divinity -- he needs  
10:50:28 4 more training or divinity --  
10:50:29 5 A Well, the way the --  
10:50:30 6 Q Let me finish the question. Other than  
10:50:32 7 referring to his wife during his preaching, do you  
10:50:34 8 believe that there is anything else that causes  
10:50:36 9 you to conclude he should need more training or to  
10:50:39 10 go to divinity school?  
10:50:42 11 A Well, way the service is being  
10:50:44 12 conducted sometime that they have a lot of  
10:50:46 13 individuals walking up on top -- walking in and  
10:50:50 14 out on top of the pulpit.  
10:50:53 15 Q Uh-huh. Anything else?  
10:50:56 16 A Just the way it con -- the way it's  
10:50:59 17 being conducted.  
10:51:00 18 Q Well, when you say, "the way it's being  
10:51:01 19 conducted," I'm asking you for specifics.  
10:51:05 20 A Well --  
10:51:05 21 Q You've told --  
10:51:05 22 A -- that's --

0115

10:51:05 1 Q -- us --  
10:51:05 2 A -- one of --  
10:51:05 3 Q -- two.  
10:51:05 4 A -- specific --  
10:51:06 5 Q You've told --  
10:51:06 6 A -- I gave --  
10:51:06 7 Q -- us --  
10:51:06 8 A -- you.  
10:51:06 9 Q -- two: Individuals there and  
10:51:09 10 references to the wife.  
10:51:10 11 Anything else?  
10:51:13 12 A That's all I can recall right now.  
10:51:14 13 Q Did Joel Peebles' father ever talk  
10:51:16 14 about the apostle in the same way that Joel refers  
10:51:20 15 to his wife?  
10:51:24 16 A Yeah.  
10:51:25 17 Q And did you find that inappropriate?  
10:51:27 18 A But he didn't do it that particular  
10:51:29 19 way. He would -- no, he -- no, he -- he wouldn't  
10:51:32 20 refer to her the way that Joel does, no.  
10:51:35 21 Q All right. And when you attend  
10:51:37 22 service -- when you say you're at the services, do

10:51:40 1 you ever actually sit down and hear the services,  
 10:51:41 2 or are you usually moving around?  
 10:51:43 3 A I'm usually moving around.  
 10:51:45 4 Q Okay. Now, with respect to the reasons  
 10:51:49 5 you've given us that you are concerned about his  
 10:51:51 6 preaching, you've given us two. One is people  
 10:51:55 7 moving around on the pulpit, and the second  
 10:51:56 8 reference is to the wife.  
 10:52:00 9 Is there anything else you can think  
 10:52:01 10 of?  
 10:52:08 11 A Well, he makes promises, for one thing.  
 10:52:14 12 Q What promises are those?  
 10:52:15 13 A When he's going to have -- like he's  
 10:52:18 14 going to have a -- one program, he say -- one --  
 10:52:26 15 one program was that we was going to have a -- a  
 10:52:31 16 April Fest.  
 10:52:33 17 Q Uh-huh.  
 10:52:33 18 A And he present that to the  
 10:52:35 19 congregation. He lied to the congregation that he  
 10:52:38 20 was going to have a April Fest, and he never  
 10:52:41 21 present it to the board.  
 10:52:44 22 Q In other words, that he talked about

10:52:46 1 a -- having an April Fest, and that was something  
 10:52:49 2 that he never presented to the group that you  
 10:52:50 3 believe to be the board; is that correct?  
 10:52:52 4 A That is the board, not believe.  
 10:52:54 5 Q Well, that's for the courts to  
 10:52:57 6 decide --  
 10:52:58 7 A Well . . .  
 10:52:58 8 Q -- as Jack Webb used to say on Dragnet.  
 10:53:02 9 I mean, this is -- your belief is this is the  
 10:53:04 10 board here, and your problem with him, as I  
 10:53:06 11 understand it, concerning the April Fest is that  
 10:53:08 12 he never talked to your group about it; correct?  
 10:53:10 13 A Right.  
 10:53:10 14 Q And, so what happened to the April  
 10:53:12 15 Fest; anything?  
 10:53:14 16 A It did not materialize.  
 10:53:15 17 Q All right. And was your group opposed  
 10:53:18 18 to having an April Fest?  
 10:53:19 19 A No.  
 10:53:19 20 Q Just wanted to be consulted?  
 10:53:21 21 A Just wanted to be consulted and --

10:53:23 22 and -- because we had sent him a letter that -- we

0118

10:53:31 1 had sent him a letter that there's a calendar,  
10:53:35 2 that let's -- you know, put things on the  
10:53:37 3 calendar. Let's work with this calendar.

10:53:40 4 Q What did he do when he got that letter?

10:53:42 5 A He didn't do anything with it because  
10:53:44 6 he never consult us to put anything on -- any  
10:53:47 7 events on the calendar.

10:53:48 8 Q Anything else about his preaching that  
10:53:49 9 you find objectionable?

10:53:53 10 A That's all I can recall right now.

10:53:54 11 Q What is it about your education,  
10:53:56 12 background and training that qualifies you to make  
10:53:59 13 a judgment about Joel Peebles' need for divinity  
10:54:04 14 school?

10:54:05 15 A Well, I would say watching other  
10:54:09 16 preachers, the apostle and people on -- on --  
10:54:14 17 on -- you know, on -- on TV.

10:54:15 18 Q Anything else?

10:54:18 19 A That's it.

10:54:22 20 MR. MARKS: Tim, how about we take a  
10:54:23 21 break at this time?

10:54:25 22 MR. MALONEY: Sure.

0119

10:54:26 1 THE VIDEOGRAPHER: Going off the  
10:54:27 2 record. The time is 10:54 a.m.

10:54:28 3 (Recess -- 10:54 a.m.)

10:54:29 4 (After recess -- 11:26 a.m.)

10:05:25 5 (Jackson Deposition Exhibit Numbers 3  
10:05:25 6 through 5 were marked for identification and  
10:05:25 7 retained by Counsel.)

11:26:32 8 THE VIDEOGRAPHER: Back on the record.  
11:26:33 9 The time is 11:26 a.m.

11:26:37 10 BY MR. MALONEY:

11:26:38 11 Q The -- during your service with the  
11:26:40 12 church, did you ever have any written contract  
11:26:42 13 with the church?

11:26:43 14 A Yes, we did have.

11:26:45 15 Q I'm going to show you what is marked as  
11:26:47 16 Exhibit Number 3 and ask you to look it over and  
11:26:53 17 ask you if, in fact, that's the written contract?

11:27:19 18 A (Witness reviews document.)

11:28:06 19 Q Tell me when you're finished reviewing

11:28:08 20 it.  
11:28:28 21 A (Witness continues reviewing document.)  
11:28:30 22 Okay.

0120

11:28:30 1 Q I direct your attention to the last  
11:28:31 2 page, the signature page, and ask you if that's  
11:28:35 3 your signature there?  
11:28:42 4 A Apostle Betty Peebles?  
11:28:44 5 Q Yes.  
11:28:45 6 A Uh-huh.  
11:28:45 7 Q And is that your signature below the  
11:28:47 8 apostle's signature?  
11:28:47 9 A Yes.  
11:28:48 10 Q And did you sign this on or about  
11:28:49 11 September the 10th of 2002?  
11:28:51 12 A Yeah.  
11:28:52 13 Q All right. And were you operating  
11:28:53 14 under a contract for that year?  
11:28:54 15 A For that year, yeah.  
11:28:55 16 Q And directing your attention to the  
11:28:57 17 salary level, does that refresh your recollection  
11:28:59 18 that, in fact, your salary at that time for the  
11:29:02 19 year 2002-2003 was \$51,500?  
11:29:06 20 A Uh-huh.  
11:29:08 21 Q Is that a yes?  
11:29:08 22 A Yes.

0121

11:29:09 1 Q So are you correcting your prior  
11:29:10 2 testimony that you were making \$71,000?  
11:29:17 3 A Yes.  
11:29:18 4 Q I'll show you what is marked as  
11:29:21 5 Deposition Exhibit Number 4, which is an employee  
11:29:27 6 change record, which also shows for September 2002  
11:29:30 7 you receiving a pay raise from 50,000 to \$51,500.  
11:29:36 8 Do you see that?  
11:29:37 9 A Yes.  
11:29:39 10 Q When your pay -- you say your pay was  
11:29:41 11 raised in 2010 to \$91,000. Was your pay, in fact,  
11:29:47 12 raised from \$51,500 to \$91,000?  
11:29:53 13 A No.  
11:29:53 14 Q What was your pay level at the time  
11:29:55 15 your pay was raised?  
11:29:56 16 A I think it was around 71,000.  
11:30:00 17 Q When do your --

11:30:01 18 A Before --  
11:30:03 19 Q Go ahead. Are you finished your  
11:30:05 20 answer?  
11:30:05 21 A No. Ask your question again.  
11:30:07 22 Q Well, when do you think your pay was

0122

11:30:09 1 raised from 51,500 to 71,000?  
11:30:15 2 A Oh, we had a couple of payment -- a pay  
11:30:19 3 period in between -- raises in between that.  
11:30:21 4 Q And when did --  
11:30:22 5 A I couldn't tell you.  
11:30:25 6 Q Do you know --  
11:30:26 7 A It came up to 71.  
11:30:27 8 Q Do you know when those salary increases  
11:30:30 9 occurred, or how they occurred?  
11:30:32 10 A Well, they -- if -- if it was occurred,  
11:30:33 11 it was because our pastor approved it.  
11:30:36 12 Q Well, when were they --  
11:30:38 13 A I couldn't --  
11:30:39 14 Q -- and in what amounts?  
11:30:40 15 A I couldn't give it to you. I have -- I  
11:30:41 16 have no idea.  
11:30:42 17 Q Have you ever had a contract with the  
11:30:43 18 church, with Jericho Baptist, at any time other  
11:30:46 19 than the contract that we see here as Exhibit  
11:30:48 20 Number 3?  
11:30:48 21 A No, this is the only one that I can  
11:30:50 22 remember.

0123

11:30:51 1 Q Do you know why you had a contract for  
11:30:53 2 that year and not for any other year?  
11:30:55 3 A I'm thinking that's when we started out  
11:30:57 4 having contracts with everyone.  
11:30:59 5 Q All right. Are you telling me that the  
11:31:04 6 apostle would give you increases of -- in the  
11:31:05 7 magnitude of 10 to \$20,000?  
11:31:08 8 A Yeah.  
11:31:09 9 Q And what did you do to earn those  
11:31:11 10 increases?  
11:31:12 11 A I did a lot.  
11:31:13 12 Q And what was that?  
11:31:14 13 A Facilitated the man -- the -- the --  
11:31:17 14 the building, saved money, the warehouse.  
11:31:25 15 Q Are you aware of anyone else in the



11:31:27 16 church ever having a written contract of  
11:31:28 17 employment other than you?  
11:31:30 18 A We all had -- on the staff of the  
11:31:36 19 administration had contract.  
11:31:37 20 Q Did the apostle ever accuse you of  
11:31:40 21 mismanaging or stealing money from the church?  
11:31:44 22 A No.

0124

11:31:44 1 Q Did she ever remove you at any time  
11:31:46 2 from the counting of monies or the handling of  
11:31:48 3 money at the church?  
11:31:49 4 A No.  
11:31:50 5 Q The -- with respect -- how about anyone  
11:31:53 6 else at the church?  
11:31:55 7 A No.  
11:31:55 8 Q Dorothy Williams, did she ever remove  
11:31:57 9 Dorothy Williams from the counting of money?  
11:32:00 10 A No.  
11:32:01 11 Q Did she ever do anything to -- express  
11:32:05 12 any concern about Dorothy Williams' management of  
11:32:09 13 the money at the church?  
11:32:10 14 A No.  
11:32:11 15 Q As a member of the board of trustees,  
11:32:14 16 have you ever seen any financial statements of the  
11:32:17 17 church as a member of the purported board?  
11:32:22 18 A Yes, I have.  
11:32:23 19 Q And tell me what you've seen.  
11:32:24 20 A I've seen the one report of the  
11:32:32 21 financial statement. I can't quite recall, but  
11:32:44 22 it -- we had a -- it had a outline of what the

0125

11:32:47 1 spendage was.  
11:32:50 2 Q The expenditures?  
11:32:51 3 A Yeah.  
11:32:52 4 Q And when was -- when did -- was that  
11:32:53 5 pro -- provided to you?  
11:32:54 6 A It was one of the -- at one of the  
11:32:56 7 board -- board meetings we had.  
11:32:58 8 Q And who provided that to you?  
11:33:03 9 A Dorothy Williams.  
11:33:04 10 Q And for what -- how long ago was that?  
11:33:05 11 A Maybe a couple months ago.  
11:33:07 12 Q And for what period of time were those  
11:33:08 13 expenditures listed?

11:33:10 14 A I think it was like, maybe, a  
11:33:11 15 quarterly.  
11:33:12 16 Q Was that for the third quarter of the  
11:33:14 17 year 2010?  
11:33:17 18 A Yeah, I believe so.  
11:33:19 19 Q What has happened --  
11:33:21 20 MR. MARKS: Don't guess.  
11:33:21 21 BY MR. MALONEY:  
11:33:21 22 Q What has happened to the other

0126

11:33:22 1 financial statements, if you know?  
11:33:26 2 A What happened to the other financial  
11:33:28 3 statements?  
11:33:28 4 Q Yeah. Have you ever seen the other  
11:33:30 5 financial statements?  
11:33:31 6 A (Witness shakes head.)  
11:33:32 7 Q You have to give a --  
11:33:33 8 A No.  
11:33:33 9 Q No. And why haven't those other  
11:33:35 10 financial statements been forthcoming, if you  
11:33:37 11 know?  
11:33:38 12 A I don't know.  
11:33:39 13 Q Have you ever discussed with  
11:33:40 14 Ms. Williams or raised with her the issue of  
11:33:43 15 the -- where the financial statements are?  
11:33:48 16 A No.  
11:33:48 17 Q All right. Are you close to  
11:33:48 18 Ms. Williams?  
11:33:49 19 A We work together, yes.  
11:33:51 20 Q Have you ever had a social relationship  
11:33:53 21 with her?  
11:33:53 22 A No.

0127

11:33:54 1 Q At no time?  
11:33:56 2 A Oh, back in '90 -- when I first came  
11:33:59 3 aboard in '90, we dated.  
11:34:01 4 Q For how long?  
11:34:02 5 A Six months.  
11:34:02 6 Q Okay. And as a board member, have you,  
11:34:06 7 yourself, ever taken any action to raise concerns  
11:34:08 8 that financial statements have not been  
11:34:11 9 forthcoming except for the third quarter of  
11:34:15 10 calendar year 2010?  
11:34:16 11 A Well, the board had -- the chair had

11:34:22 12 mentioned that -- that she wants more statements  
11:34:27 13 from her, and she said that she would -- she'll --  
11:34:31 14 she working on that, and she had to work through  
11:34:33 15 the -- the auditor.  
11:34:37 16 Q And who is the auditor?  
11:34:39 17 A Pardon me?  
11:34:40 18 Q Who is the auditor?  
11:34:42 19 A I don't -- I don't know his name, and I  
11:34:44 20 don't know the company's name.  
11:34:45 21 Q Did Ms. Williams ever explain to you,  
11:34:47 22 or to anyone else, or to the board what was

0128

11:34:50 1 holding up the financial statements?  
11:34:53 2 A No, I'm not aware of it.  
11:34:56 3 MR. MALONEY: And, Counsel, I -- you  
11:34:58 4 indicated at the last deposition session that your  
11:35:00 5 response to our request for production of  
11:35:02 6 documents would be imminent.  
11:35:05 7 Do we have them today?  
11:35:07 8 MR. MARKS: Not today, but they are  
11:35:08 9 imminent.  
11:35:10 10 MR. MALONEY: You said they were on  
11:35:10 11 your desk.  
11:35:13 12 MR. MARKS: We're working on those. I  
11:35:14 13 want to make sure I send you everything. I don't  
11:35:17 14 want to send them piecemeal.  
11:35:18 15 BY MR. MALONEY:  
11:35:19 16 Q With respect to the financial  
11:35:20 17 statements, has there ever been an audit done of  
11:35:25 18 the church financial performance for either  
11:35:27 19 calendar year 2009 or calendar year 2010?  
11:35:32 20 A I'm not aware, but I --  
11:35:40 21 MR. MARKS: Don't guess.  
11:35:41 22 THE WITNESS: I can't guess, no.

0129

11:35:42 1 BY MR. MALONEY:  
11:35:42 2 Q I'm not asking you to guess. I'm  
11:35:43 3 asking you, are you aware of the audit reports  
11:35:46 4 ever been -- being prepared?  
11:35:48 5 A No.  
11:35:48 6 Q As a board member yourself, have you  
11:35:50 7 ever taken any steps to see that the books and  
11:35:52 8 records of Jericho Baptist have been audited for  
11:35:58 9 either calendar year 2009 or 2010?

11:36:00 10 A No more than what was brought to the  
11:36:02 11 board that I just said earlier.  
11:36:05 12 Q What fiscal year does the church  
11:36:08 13 operate on, if you know?  
11:36:14 14 A I'm not aware.  
11:36:16 15 Q What has happened to the financial  
11:36:17 16 performance of Jericho Baptist since the death of  
11:36:20 17 Betty Peebles?  
11:36:23 18 A Well, the membership has declined --  
11:36:31 19 Q Uh-huh.  
11:36:31 20 A -- somewhat, and -- and sometime the --  
11:36:39 21 the offerings has been down.  
11:36:42 22 Q Well, when you say the -- and how about

0130

11:36:44 1 the expenditures of the church, have they  
11:36:46 2 increased or decreased?  
11:36:48 3 A Oh, no, we always keep that down.  
11:36:50 4 Q Uh-huh. Well, have the salary levels  
11:36:52 5 increased, decreased or stayed the same?  
11:36:56 6 A Stayed the same.  
11:36:57 7 Q The -- has anyone else gotten pay  
11:36:59 8 raises besides your own pay raise to \$91,000?  
11:37:04 9 A I didn't get a full \$91,000 raise.  
11:37:07 10 Q No, I said your pay raise to \$91,000.  
11:37:11 11 Other than that pay raise, are you aware of anyone  
11:37:14 12 else --  
11:37:14 13 A No.  
11:37:14 14 Q -- in the church getting pay raises?  
11:37:18 15 A No.  
11:37:18 16 Q Why have you been the only one to get a  
11:37:20 17 pay raise?  
11:37:21 18 MR. MARKS: Objection; that's  
11:37:22 19 mischaracterization of the testimony. There's no  
11:37:24 20 testimony that he is the only on who's gotten a  
11:37:26 21 pay raise.  
11:37:27 22 MR. MALONEY: He just told us he's not

0131

11:37:28 1 aware of anyone else.  
11:37:31 2 MR. MARKS: If that's the case, he's  
11:37:32 3 answered your question.  
11:37:34 4 MR. MALONEY: Well, my question is, why  
11:37:35 5 are you the only one?  
11:37:37 6 MR. MARKS: Object. That's a  
11:37:38 7 mischaracterization. There's no foundation that

11:37:42 8 he is the only one.  
11:37:43 9 BY MR. MALONEY:  
11:37:44 10 Q Go ahead.  
11:37:44 11 MR. MARKS: You may answer if you know.  
11:37:46 12 THE WITNESS: I'm not aware.  
11:37:46 13 BY MR. MALONEY:  
11:37:47 14 Q The -- has the board of directors  
11:37:48 15 discussed the issue of pay raises?  
11:37:51 16 A No.  
11:37:51 17 Q Uh-huh. When -- has there been any  
11:37:53 18 annual performance review by you on the board of  
11:37:56 19 directors -- by the board of directors of your  
11:37:59 20 performance?  
11:38:01 21 A Repeat your question.  
11:38:02 22 Q Has the board of directors con --

0132

11:38:03 1 con -- or your supervisor performed any annual  
11:38:08 2 performance review of your performance as an  
11:38:10 3 employee?  
11:38:11 4 A The apostle, when she was on the board.  
11:38:14 5 Q How about since the death of the  
11:38:16 6 apostle? Has that occurred?  
11:38:17 7 A No.  
11:38:18 8 Q Are you concerned at all about the  
11:38:19 9 conflict of serving as both an employee and a  
11:38:22 10 purported director of Jericho Baptist?  
11:38:25 11 MR. MARKS: Objection to the  
11:38:26 12 characterization --  
11:38:26 13 BY MR. MALONEY:  
11:38:27 14 Q Go ahead.  
11:38:27 15 MR. MARKS: -- of -- let me state my  
11:38:29 16 objection.  
11:38:30 17 I object to your characteration (sic)  
11:38:32 18 as a conflict in his serving. There is no  
11:38:34 19 foundation that there is a conflict in him  
11:38:38 20 serving.  
11:38:38 21 BY MR. MALONEY:  
11:38:38 22 Q Go ahead.

0133

11:38:39 1 MR. MARKS: You may answer if you know.  
11:38:41 2 THE WITNESS: I'm not aware.  
11:38:42 3 BY MR. MALONEY:  
11:38:42 4 Q As a member of the board, have you or  
11:38:44 5 anyone else at the board, to your knowledge, taken

11:38:46 6 any steps to deal with the dual role of serving as  
11:38:48 7 both purported directors and employees?  
11:38:56 8 A No.  
11:38:56 9 Q How about for the other two employees  
11:38:57 10 who serve on the board? Are you aware of them  
11:38:58 11 taking any steps to deal with the dual role that  
11:39:01 12 they have as both a purported director and an  
11:39:04 13 employee?  
11:39:05 14 A No.  
11:39:06 15 Q With respect to the attendance that you  
11:39:08 16 say has declined, let's start with the  
11:39:11 17 eight o'clock service first.  
11:39:12 18 You don't attend the eight o'clock  
11:39:15 19 service; correct?  
11:39:16 20 A Well, once in a while.  
11:39:17 21 Q Well, but you're not a regular attendee  
11:39:19 22 of the eight o'clock service, are you?

0134

11:39:21 1 A No.  
11:39:21 2 Q And you certainly don't sit in the  
11:39:22 3 eight o'clock service, do you?  
11:39:24 4 A No.  
11:39:25 5 Q All right. And with respect to the  
11:39:26 6 attendance there, is there any device or  
11:39:30 7 measurement to record or register the attendance,  
11:39:33 8 or is that just what you happen to see by looking  
11:39:36 9 out in the congregation?  
11:39:38 10 A You'll see what you observe.  
11:39:39 11 Q All right. So you're not able to  
11:39:41 12 quantify any increase or decrease in the  
11:39:43 13 attendance, are you?  
11:39:45 14 A For the eight o'clock?  
11:39:46 15 Q For the eight o'clock.  
11:39:48 16 A No.  
11:39:48 17 Q All right. And you don't know --  
11:39:50 18 personally, you don't know one way or another  
11:39:54 19 whether the attendance at the eight o'clock has  
11:39:56 20 gone up, gone down or stayed the same; is that  
11:39:59 21 correct?  
11:40:03 22 A Well, let me -- let me back -- make

0135

11:40:07 1 a -- a -- a statement back that when the pews --  
11:40:09 2 let's say, for instance, the pews -- a certain  
11:40:12 3 area of the pews are not full, then, you know,

11:40:16 4 that gives you an indication.  
11:40:17 5 Q In other words, if you see the empty  
11:40:19 6 seats; is that right?  
11:40:20 7 A Right.  
11:40:20 8 Q Okay. And then the second question  
11:40:22 9 that I would have is this: With respect to the  
11:40:27 10 eight o'clock information -- with respect to the  
11:40:31 11 collection on the eight o'clock attendance, what  
11:40:34 12 has happened to the collection proceeds since the  
11:40:37 13 death of the apostle at the eight o'clock service?  
11:40:40 14 Has it gone up, gone down or remained the same?  
11:40:42 15 A I believe it remained the same.  
11:40:44 16 Q All right. And what do you base that  
11:40:46 17 belief on?  
11:40:47 18 A From what I -- when I -- when I come  
11:40:49 19 in, what I observe.  
11:40:51 20 Q All right. Do you, yourself, have any  
11:40:54 21 role in the collections?  
11:40:55 22 A Sometime when -- when the offerings

0136

11:40:56 1 come up, I pick up the bucket and take it in the  
11:40:59 2 back with Dot Williams.  
11:41:02 3 Q How does the collection procedure work?  
11:41:08 4 A Well, the -- they call from the pulpit,  
11:41:09 5 you know, it's offering time, and the congregation  
11:41:12 6 comes up, drop it in the -- on the pulpit, we have  
11:41:19 7 buckets there --  
11:41:21 8 Q Uh-huh.  
11:41:21 9 A -- and drops it in there, and once  
11:41:22 10 it's -- when it's finished and we collect the  
11:41:25 11 buckets and take it in the back into the financial  
11:41:28 12 room.  
11:41:28 13 Q When you say "we" does that, who  
11:41:30 14 individually does it?  
11:41:31 15 A It was either myself -- Dot or myself,  
11:41:36 16 Boswell or Dot.  
11:41:38 17 Q And then what happens from there?  
11:41:40 18 A Once it gets in there, they secure it,  
11:41:43 19 put it in the bag and put it in the safe.  
11:41:45 20 Q And when's it counted?  
11:41:47 21 A On the next day.  
11:41:48 22 Q And who does the counting?

0137

11:41:50 1 A Ann Wesley, Jennie Jackson and

11:41:57 2 Dorothy Williams.  
11:41:58 3 Q And who actually takes the collection  
11:42:00 4 to the Bank of America?  
11:42:03 5 A Dorothy Williams and a retired police  
11:42:07 6 officer.  
11:42:07 7 Q Retired Prince George's County police  
11:42:09 8 officer?  
11:42:10 9 A D.C. police officer.  
11:42:11 10 Q And which officer is that? What is his  
11:42:13 11 name?  
11:42:14 12 A Ronald Lee.  
11:42:15 13 Q Is he a member of the congregation?  
11:42:17 14 A Yes, he is.  
11:42:18 15 Q Is he compensated for that work?  
11:42:20 16 A Yes.  
11:42:20 17 Q How much is he paid, if you know?  
11:42:23 18 A \$50.  
11:42:26 19 Q The -- with respect to the  
11:42:28 20 eleven o'clock service, what has happened, if you  
11:42:31 21 know, to the collection at the eleven o'clock  
11:42:35 22 service? Has it increased, decreased or remained

0138

11:42:38 1 the same?  
11:42:39 2 A Well, it depends on, you know, the  
11:42:41 3 attending. I'd say it's decreased.  
11:42:46 4 Q Do you have -- you're saying that based  
11:42:47 5 on personal knowledge or is that just a guess?  
11:42:49 6 A Just what I observe.  
11:42:50 7 Q All right. Have you, yourself, ever  
11:42:52 8 seen any figures from Ms. Williams or from anyone  
11:42:55 9 else that would break down or itemize the proceeds  
11:43:00 10 or revenue from the eight o'clock and the  
11:43:02 11 eleven o'clock services?  
11:43:04 12 A No.  
11:43:05 13 Q Is there any effort to record that  
11:43:07 14 information and account for it? In other words,  
11:43:11 15 to determine, on a weekly basis, how much is  
11:43:13 16 collected from the eight o'clock service and how  
11:43:15 17 much is collected from the eleven o'clock service?  
11:43:18 18 A That would be --  
11:43:19 19 MR. MARKS: Objection to the question.  
11:43:20 20 There's no foundation.  
11:43:21 21 BY MR. MALONEY:  
11:43:22 22 Q Go ahead.



11:43:24 1 MR. MARKS: You may answer if you know.  
11:43:25 2 THE WITNESS: I'm not aware of that.  
11:43:26 3 BY MR. MALONEY:  
11:43:26 4 Q Have you -- have you or any other  
11:43:28 5 members of the board of directors, to your  
11:43:35 6 knowledge, ever been pre -- presented with any  
11:43:35 7 information that would show how much is being  
11:43:36 8 collected from the eight o'clock service and how  
11:43:37 9 much from the 11, and what the trends have been?  
11:43:41 10 A No.  
11:43:42 11 Q Have you ever asked for such  
11:43:44 12 information?  
11:43:44 13 A No, I haven't.  
11:43:45 14 Q So as a purported director, is that  
11:43:49 15 information important to you?  
11:43:50 16 A Yes, it is.  
11:43:51 17 Q All right. And why is it important to  
11:43:52 18 you?  
11:43:53 19 A Because that's the financial of the  
11:43:57 20 church.  
11:43:58 21 Q If it's important to you, then why have  
11:44:00 22 you not taken steps to obtain that information?

11:44:02 1 A Well, I hadn't gotten around to it.  
11:44:08 2 Q All right. You've been too busy?  
11:44:09 3 A Yeah.  
11:44:10 4 Q What have you been too busy with?  
11:44:12 5 A Repeat your question.  
11:44:14 6 Q What have you been too busy with?  
11:44:16 7 A With everything.  
11:44:16 8 Q Has this litigation, if you know, had  
11:44:19 9 any impact upon the church attendance or church  
11:44:23 10 collections?  
11:44:23 11 A Oh, yes.  
11:44:24 12 Q And why do you say that?  
11:44:26 13 A Because some of the -- some of the  
11:44:28 14 members of the church don't like the way that  
11:44:30 15 he -- way Joel Peebles performs --  
11:44:36 16 Q Uh-huh.  
11:44:36 17 A -- on the church at eleven o'clock.  
11:44:38 18 Q And with respect to the litigation, did  
11:44:40 19 you consider, prior to the time that the lawsuit  
11:44:43 20 was filed by you and the other purported  
11:44:46 21 directors, that that would impact on church

11:44:49 22 attendance and church collections?

0141

11:44:51 1 A No.  
11:44:51 2 Q Were you ever consulted, you or any of  
11:44:54 3 the other directors, about the lawsuit prior to  
11:44:57 4 the time that it was filed?  
11:45:01 5 A Repeat the question.  
11:45:01 6 Q Were you or any of the other directors,  
11:45:04 7 to your knowledge, ever consulted about the  
11:45:07 8 lawsuit prior to the time that it was filed?  
11:45:11 9 A By who?  
11:45:13 10 Q By anybody.  
11:45:13 11 A No.  
11:45:14 12 Q When -- how did you become aware that  
11:45:16 13 the lawsuit had actually been filed?  
11:45:23 14 A From the attorney, Isaac Marks.  
11:45:27 15 Q After it had been filed?  
11:45:28 16 A Yep.  
11:45:30 17 Q Were you concerned that you were not  
11:45:31 18 consulted in advance prior to the filing --  
11:45:34 19 A Yes, we were --  
11:45:36 20 Q -- of the lawsuit?  
11:45:37 21 A -- consulted. I take that back. We  
11:45:41 22 were consulted in advance.

0142

11:45:41 1 Q Was there ever a formal vote of the  
11:45:44 2 board of trustees to authorize the filing of the  
11:45:46 3 lawsuit?  
11:45:47 4 A Yes.  
11:45:47 5 Q And when did that take place?  
11:45:48 6 A Prior to the -- the filing.  
11:45:49 7 Q Was there a formal meeting that was  
11:45:50 8 called?  
11:45:51 9 A Yes.  
11:45:51 10 Q What was the date of the formal  
11:45:53 11 meeting?  
11:45:54 12 A I can't give you a -- I can't recall.  
11:45:57 13 Q Uh-huh. At the time --  
11:45:58 14 MR. MALONEY: God bless you.  
11:45:59 15 MR. MARKS: Bless you.  
11:45:59 16 THE COURT REPORTER: Thanks.  
11:45:59 17 BY MR. MALONEY:  
11:45:59 18 Q At the time that the lawsuit was filed,  
11:46:00 19 was that filed right after Joel Peebles had

11:46:03 20 requested a meeting with you and the other  
11:46:08 21 purported directors?  
11:46:09 22 A It might have. I -- I can't recall.

0143

11:46:10 1 Q All right. And you recall when  
11:46:12 2 Joel Peebles asked for that meeting; correct?  
11:46:21 3 A Yes.  
11:46:22 4 Q And no -- you could -- you and the  
11:46:25 5 other purported directors would not agree to have  
11:46:28 6 such a meeting; isn't that correct?

11:46:53 7 MR. MARKS: I'm sorry. Do you recall  
11:46:54 8 the question? Do you recall the question?

11:46:57 9 THE WITNESS: I'm trying to remember,  
11:46:57 10 because it was some things that might have  
11:46:59 11 happened in between, but I -- I -- I can't -- I  
11:47:04 12 can't recall.

11:47:06 13 BY MR. MALONEY:

11:47:07 14 Q Instead of meeting with Joel Peebles,  
11:47:09 15 the lawsuit was filed; isn't that correct?

11:47:14 16 A Well, let me -- let me say this.  
11:47:22 17 Before the lawsuit was filed, Joel Peebles came to  
11:47:27 18 my office and walk in my office and say I'm -- I'm  
11:47:32 19 senior pastor; I'm in charge; I want all the  
11:47:35 20 keys -- I'll never forget that, because I had just  
11:47:39 21 was grieving over Pastor -- and I want all the  
11:47:44 22 keys to the complex.

0144

11:47:54 1 And when I told him that it was a board  
11:47:56 2 issue, he kept on insisting.

11:48:02 3 Q And did you see --

11:48:03 4 A And he --

11:48:05 5 Q Go ahead.

11:48:05 6 A And it's a couple incident that also  
11:48:08 7 that occurred -- I'm trying to remember -- but  
11:48:10 8 that's all I can give you at this time.

11:48:13 9 Q Were you --

11:48:14 10 A But his demeaning and his demanding,  
11:48:16 11 you know, and his actions.

11:48:19 12 Q You say his demeanor?

11:48:21 13 A Yeah.

11:48:22 14 Q And what was -- what was it about his  
11:48:27 15 demeanor that concerns you?

11:48:28 16 A I'm in charge.

11:48:29 17 Q Uh-huh.

11:48:29 18 A You do what I tell you. He said,  
11:48:32 19 either you work with me --  
11:48:32 20 Q Uh-huh.  
11:48:32 21 A -- or you don't work with me.  
11:48:34 22 Q Uh-huh. Is that what he said to you?

0145

11:48:36 1 A That's what he said to me.  
11:48:37 2 Q And did that up --  
11:48:39 3 A And I said --  
11:48:40 4 Q Go ahead.  
11:48:41 5 A And I said to him -- he said, I'll be  
11:48:44 6 back in a half an hour. I want those keys.  
11:48:47 7 Q Uh-huh.  
11:48:47 8 A So, as I said earlier, I called the  
11:48:51 9 board members up and they said no; at this time,  
11:48:55 10 no.  
11:48:55 11 Q And is that what led to the filing of  
11:48:57 12 the lawsuit?  
11:48:58 13 A No, I wouldn't say that. I'd say some  
11:49:00 14 other things might have occurred --  
11:49:02 15 Q What -- what --  
11:49:04 16 A -- before the filing.  
11:49:05 17 Q What --  
11:49:06 18 A I can't think of it, and I'm not aware  
11:49:08 19 of it.  
11:49:08 20 Q And why did it upset you that he said  
11:49:10 21 those things to you?  
11:49:11 22 A Because the way he barged into my --

0146

11:49:15 1 into my office --  
11:49:22 2 Q Uh-huh.  
11:49:22 3 A -- and the way he said it, I'm senior  
11:49:22 4 pastor.  
11:49:23 5 Q Uh-huh.  
11:49:23 6 A I'm in charge.  
11:49:26 7 Q Uh-huh.  
11:49:26 8 A This was two days after Pastor passed.  
11:49:30 9 Q Uh-huh.  
11:49:30 10 A I want the key --  
11:49:33 11 Q Did you feel like --  
11:49:34 12 A -- to everything.  
11:49:35 13 Q -- you were in charge --  
11:49:37 14 A But I was -- I was -- I was just crying  
11:49:39 15 because I was still grieving over Pastor.

11:49:43 16 Q Uh-huh. Did you feel like you were in  
11:49:45 17 charge instead of him?  
11:49:46 18 A No.  
11:49:47 19 Q Uh-huh.  
11:49:46 20 A I never did.  
11:49:47 21 Q Uh-huh. Well, if he wasn't in charge,  
11:49:49 22 who was?

0147

11:49:49 1 A He say he was in charge.  
11:49:51 2 Q I understand that. My question is, if  
11:49:53 3 Joel Peebles was not in charge, who was in charge?  
11:49:55 4 A The board was.  
11:49:57 5 Q The purported board you've described?  
11:50:00 6 A The board that we on, yes.  
11:50:01 7 Q I see. Now -- and with respect to that  
11:50:04 8 board, what did the board do then to take over the  
11:50:06 9 governance of the church, if anything?  
11:50:10 10 A Well, we -- we -- we secured the --  
11:50:13 11 the -- the office.  
11:50:15 12 Q The apostle's office?  
11:50:17 13 A No, the financials office.  
11:50:19 14 Q Okay.  
11:50:20 15 A The business office.  
11:50:21 16 Q Okay. Anything else? Did you promise  
11:50:27 17 him that you'd bring him a set of keys later?  
11:50:32 18 A No.  
11:50:33 19 Q Did you tell him, no, you would not  
11:50:35 20 give him keys --  
11:50:36 21 A No, I didn't --  
11:50:38 22 Q -- on the spot?

0148

11:50:39 1 A I -- like I said earlier, he has a set  
11:50:43 2 of master key --  
11:50:45 3 Q Uh-huh.  
11:50:45 4 A -- and I thought --  
11:50:45 5 Q Uh-huh.  
11:50:45 6 A -- that he misplaced the master key.  
11:50:47 7 And when he say, I'll be back in a half an hour to  
11:50:51 8 get the keys, I didn't say anything.  
11:50:54 9 Q Right.  
11:50:55 10 A Because I was still upset, you know.  
11:50:59 11 Q So it's your testimony you never told  
11:51:00 12 him no; you never told him yes, either --  
11:51:04 13 A Right.

11:51:05 14 Q -- you just walked away; is that right?  
11:51:07 15 A Right.  
11:51:07 16 Q Okay. How about the signatories on the  
11:51:10 17 bank account? Did there come a time when the  
11:51:13 18 authorized signers on the -- either the Bank of  
11:51:15 19 America or the PNC or the Harbor Bank accounts  
11:51:19 20 were changed?  
11:51:22 21 A I'm -- I'm not aware of that.  
11:51:24 22 Q Have you ever been a authorized signer

0149

11:51:27 1 on any of the bank accounts?  
11:51:29 2 A Just recently, you know, for the two  
11:51:31 3 signature.  
11:51:31 4 Q And what's that all about?  
11:51:35 5 A If one of us -- at least two people  
11:51:37 6 sign the check.  
11:51:38 7 Q Uh-huh. All checks, or checks over a  
11:51:40 8 certain amount?  
11:51:42 9 A Well, I think a check over a certain  
11:51:44 10 amount.  
11:51:44 11 Q And what amount is that?  
11:51:46 12 A I -- I -- I -- I'm -- I can't think at  
11:51:54 13 this time. I'm not aware -- aware of what it is  
11:51:55 14 now.  
11:51:55 15 Q Have -- have you ever signed any  
11:51:56 16 checks --  
11:51:56 17 A Never.  
11:51:57 18 Q -- on behalf of the church?  
11:51:59 19 A Never.  
11:51:59 20 Q With respect to the total amount of the  
11:52:01 21 collections, what's your estimate of the total  
11:52:03 22 amount of the Sunday collections from both the

0150

11:52:05 1 eight o'clock and the eleven o'clock service?  
11:52:08 2 A I -- I have no idea.  
11:52:09 3 Q Do you or anything -- anyone else at  
11:52:12 4 the board have any plan to deal with what you  
11:52:15 5 perceive to be the declining attendance and  
11:52:18 6 revenue?  
11:52:20 7 A Oh, yes.  
11:52:21 8 Q And what is that plan?  
11:52:23 9 A I -- I have no idea at this moment.  
11:52:25 10 Q You don't have any idea?  
11:52:27 11 A No.

11:52:27 12 Q Do you, yourself, have any ideas as to  
11:52:30 13 what to do about this?  
11:52:31 14 A Well -- no, it would have to be a board  
11:52:36 15 issue.  
11:52:37 16 Q Well, that's obvious.  
11:52:38 17 A Right.  
11:52:38 18 Q Once the board's decided who it is.  
11:52:41 19 But I'm asking about you, Clarence Jackson. Do  
11:52:46 20 you, yourself, have any ideas, suggestions,  
11:52:48 21 proposals, concepts of your own?  
11:52:52 22 A Not at this time.

0151

11:52:53 1 Q Uh-huh. Have you ever had any such  
11:52:54 2 ideas in the past?  
11:52:55 3 MR. MARKS: Let me object to this line  
11:52:56 4 of questioning. The deponent has stated his --  
11:52:58 5 his answer to your question.  
11:53:02 6 MR. MALONEY: He says, "Not at this  
11:53:02 7 time," and I'm asking about the past.  
11:53:04 8 BY MR. MALONEY:  
11:53:04 9 Q Anytime since the apostle died up to  
11:53:06 10 the present, have you any -- have you ever had any  
11:53:07 11 idea as to how to deal with these issues?  
11:53:09 12 A No.  
11:53:10 13 MR. MARKS: Objection to the  
11:53:11 14 characterization. There's no foundation that  
11:53:13 15 these were issues when the apostle died.  
11:53:15 16 BY MR. MALONEY:  
11:53:15 17 Q Go ahead.  
11:53:16 18 MR. MARKS: You may answer the question  
11:53:17 19 if you know.  
11:53:18 20 THE WITNESS: Not at this time.  
11:53:19 21 BY MR. MALONEY:  
11:53:20 22 Q How about the res -- how about the

0152

11:53:20 1 issues with respect to Joel Peebles, Senior? How  
11:53:24 2 are those going to get resolved?  
11:53:26 3 MR. MARKS: Objection to the question.  
11:53:27 4 What issues are you talking about?  
11:53:29 5 MR. MALONEY: The issues that bring us  
11:53:31 6 here today.  
11:53:32 7 MR. MARKS: Objection to the question.  
11:53:33 8 What issues are you referring to,  
11:53:34 9 Counsel?

11:53:36 10 MR. MALONEY: Issues of governance,  
11:53:38 11 structure of the board, management, authority,  
11:53:41 12 pastoral control, all the things that are the  
11:53:43 13 subject of this litigation.  
11:53:48 14 THE WITNESS: Well, it's a board issue,  
11:53:52 15 and we're -- we're trying to work with the  
11:53:54 16 Peacemakers -- we're trying to work with him.  
11:53:59 17 BY MR. MALONEY:  
11:53:59 18 Q How are you trying to work with him?  
11:54:00 19 A By asking him to sit down and talk with  
11:54:02 20 us, and each time he done that, he start to go off  
11:54:08 21 and, you know, bully, get upset.  
11:54:11 22 Q Uh-huh. Uh-huh. When you say we're

0153

11:54:12 1 trying to talk to him, what do you mean by that?  
11:54:16 2 A Well, we're trying to say, look, Joel,  
11:54:18 3 we want to settle; we want to -- what can we do --  
11:54:20 4 Q Uh-huh.  
11:54:20 5 A -- to, you know, alleviate this.  
11:54:22 6 Q Uh-huh. Well, what do you think would  
11:54:23 7 be a fair resolution of all this?  
11:54:27 8 A For us to come together and -- and talk  
11:54:29 9 about it --  
11:54:30 10 Q Uh-huh.  
11:54:30 11 A -- in a peaceful --  
11:54:33 12 Q Uh-huh.  
11:54:33 13 A -- solution.  
11:54:35 14 Q And what would be, as you say, a  
11:54:37 15 peaceful solution?  
11:54:40 16 A That we decide that this board is the  
11:54:46 17 governor board.  
11:54:49 18 Q Uh-huh.  
11:54:48 19 A He preaches.  
11:54:51 20 Q Uh-huh. Without any governing  
11:54:52 21 authority?  
11:54:53 22 A Well, we have to abide by the bylaws.

0154

11:54:59 1 Q Uh-huh. And what do the bylaws say, if  
11:55:02 2 you know?  
11:55:02 3 A I don't have it in front of me, so I  
11:55:04 4 can't give it to you.  
11:55:05 5 Q All right. Has the purported new board  
11:55:06 6 adopted new bylaws?  
11:55:08 7 A Yes.



11:55:08 8 Q Was there a meeting called with notice  
11:55:09 9 for that purpose?  
11:55:10 10 A Yes.  
11:55:11 11 Q When was that meeting?  
11:55:12 12 A Well, it started with the pastor --  
11:55:14 13 Q Uh-huh.  
11:55:14 14 A -- in '09, and she had been working on  
11:55:16 15 the bylaws along --  
11:55:18 16 Q Uh-huh.  
11:55:18 17 A -- with us.  
11:55:19 18 Q And what was that -- when was that  
11:55:20 19 meeting that was called? Had the bylaws actually  
11:55:23 20 been adopted or are they still under discussion?  
11:55:26 21 A Yeah, it's been adopted in December.  
11:55:30 22 Q December of 2010?

0155

11:55:32 1 A December 210 (sic).  
11:55:33 2 Q Was there a meeting called that gave  
11:55:35 3 notice for that effect?  
11:55:36 4 A Yeah.  
11:55:36 5 Q And what do the new bylaws provide as  
11:55:39 6 far as governing authority?  
11:55:41 7 A Repeat your question.  
11:55:42 8 Q What do the new bylaws provide as far  
11:55:44 9 as governing authority?  
11:55:46 10 A I -- I don't have it in front of me, so  
11:55:48 11 I couldn't tell you.  
11:55:49 12 Q Okay. And when you use the term  
11:55:51 13 "peacemakers," who are you referring to?  
11:55:54 14 A A group or organization that settle  
11:55:57 15 dispute with churches.  
11:56:00 16 Q This is the Christian mediation  
11:56:01 17 service?  
11:56:02 18 A That's Christian mediation.  
11:56:04 19 Q And do you, yourself, have any  
11:56:05 20 familiarity with that group?  
11:56:07 21 A No.  
11:56:07 22 Q How did you hear about them?

0156

11:56:08 1 A That it was presented to -- presented  
11:56:10 2 to us by one of the advisors that know the  
11:56:21 3 attorney.  
11:56:21 4 Q Okay. Now, with respect to the prior  
11:56:23 5 attorney, Mr. Henry, do you know him --

11:56:26 6 A Yeah.  
11:56:26 7 Q -- Bobby Henry?  
11:56:28 8 How do you know him?  
11:56:29 9 A He's a member of the church.  
11:56:31 10 Q Was he ever the general counsel to the  
11:56:33 11 church?  
11:56:33 12 A Yes.  
11:56:33 13 Q And when was that?  
11:56:39 14 A I guess when -- when we were over at  
11:56:40 15 Douglas Street.  
11:56:41 16 Q Uh-huh.  
11:56:41 17 A I was aware of it when we -- when I  
11:56:45 18 start working for the church in '98.  
11:56:48 19 Q Did there come a time when he stopped  
11:56:49 20 being the general counsel?  
11:56:51 21 A Recently.  
11:56:52 22 Q When you say "recently," when was that?

0157

11:56:56 1 A Last month.  
11:56:57 2 Q Uh-huh. And how is it that he stopped  
11:56:59 3 being the general counsel then? What happened?  
11:57:02 4 A Because his service were no longer  
11:57:04 5 needed.  
11:57:04 6 Q Well, did the board have a meeting and  
11:57:06 7 then vote to terminate his services?  
11:57:08 8 A Yes, the board did.  
11:57:09 9 Q Did they send him a letter?  
11:57:10 10 A Yes.  
11:57:11 11 Q All right. What were the reasons that  
11:57:12 12 his services were terminated?  
11:57:14 13 A Because his service was no longer  
11:57:16 14 needed.  
11:57:16 15 Q Does the board have a general counsel  
11:57:17 16 now?  
11:57:18 17 A Well, we using Isaac Marks at the  
11:57:22 18 moment now.  
11:57:23 19 Q Okay. And when was he appointed  
11:57:25 20 general counsel?  
11:57:27 21 MR. MARKS: Objection to the  
11:57:27 22 characterization. There's no testimony that I was

0158

11:57:29 1 appointed general counsel.  
11:57:30 2 BY MR. MALONEY:  
11:57:31 3 Q Okay. Go ahead.

11:57:32 4 A Well, as of moment now, we use him  
11:57:36 5 during the litigation that we have.  
11:57:38 6 Q Okay. Do you have a regular general  
11:57:39 7 counsel besides --  
11:57:40 8 A No.  
11:57:41 9 Q -- Mr. Marks?  
11:57:42 10 And with respect to Mr. Henry, did the  
11:57:45 11 apostle ever express any concerns about Mr. Henry  
11:57:47 12 to you?  
11:57:48 13 A Yes.  
11:57:49 14 Q Tell me about that.  
11:57:51 15 A That she was dissatisfied with his  
11:57:56 16 work.  
11:57:57 17 Q Uh-huh. When you say, "she was  
11:57:58 18 dissatisfied with his work," what specifically did  
11:58:01 19 she say to you?  
11:58:02 20 A Well, one instant was when, you know,  
11:58:06 21 we have a cell tower, and he could never -- when  
11:58:12 22 the contract runs -- ran out, he didn't fulfill

0159

11:58:16 1 the obligation to get it renewed at a certain  
11:58:20 2 amount.  
11:58:20 3 Q And when did that take place?  
11:58:21 4 A A couple years ago or so, I believe.  
11:58:26 5 Q Uh-huh. And did -- what did she say to  
11:58:30 6 you about that?  
11:58:32 7 A That he was lazy; he wasn't -- he  
11:58:38 8 wasn't doing what he was supposed to be doing.  
11:58:41 9 Q And she said that he was lazy?  
11:58:43 10 A Yep.  
11:58:44 11 Q And when did she tell you, the apostle,  
11:58:46 12 that Bobby Henry was lazy?  
11:58:49 13 A Repeat your question.  
11:58:50 14 Q What did -- when did the apostle tell  
11:58:52 15 you that Bobby Henry was lazy?  
11:58:57 16 A A couple -- a couple years ago.  
11:58:58 17 You mean when this came up?  
11:58:59 18 Q Uh-huh. And was the cell tower  
11:59:01 19 contract actually renewed?  
11:59:08 20 A It kind of rolled over with --  
11:59:14 21 without -- with -- with us not in the being.  
11:59:15 22 Q In other words, the apostle was seeking

0160

11:59:15 1 a higher rate --

11:59:16 2 A Yeah.  
11:59:16 3 Q -- of compensation --  
11:59:16 4 A Uh-huh.  
11:59:16 5 Q -- instead of --  
11:59:16 6 A Yes.  
11:59:17 7 Q -- just a renewal at the old rate?  
11:59:20 8 A Yes.  
11:59:20 9 Q And she told you that Bobby Henry was  
11:59:23 10 lazy because he did not obtain that?  
11:59:25 11 A He was lazy, and he wasn't currently  
11:59:29 12 doing when -- when she had asked him in a timely  
11:59:31 13 way.  
11:59:32 14 Q And what else, other than that, the  
11:59:33 15 cell phone matter, did she ever say anything to  
11:59:37 16 you or express any concerns about Bobby Henry?  
11:59:41 17 A That she didn't trust him.  
11:59:43 18 Q Did she say why she didn't trust him?  
11:59:45 19 A No.  
11:59:47 20 Q Did she ever -- did she ever -- did the  
11:59:54 21 apostle ever express to you any concerns about  
11:59:56 22 Isaac Marks?

0161

12:00:04 1 A That -- that he worked --  
12:00:08 2 MR. MARKS: Let me object to that. You  
12:00:09 3 don't have to answer that question.  
12:00:10 4 BY MR. MALONEY:  
12:00:11 5 Q Go ahead.  
12:00:11 6 MR. MARKS: No, don't answer that.  
12:00:12 7 MR. MALONEY: Based --  
12:00:13 8 MR. MARKS: That's privileged  
12:00:15 9 information.  
12:00:16 10 MR. MALONEY: Priv -- her saying  
12:00:16 11 something to Mr. Jackson?  
12:00:19 12 MR. MARKS: About legal counsel,  
12:00:19 13 whatever legal counsel may have advised her on,  
12:00:22 14 yes.  
12:00:23 15 MR. MALONEY: No.  
12:00:23 16 MR. MARKS: We're asserting the  
12:00:24 17 privilege over that.  
12:00:25 18 MR. MALONEY: There's no privilege  
12:00:26 19 about that.  
12:00:28 20 MR. MARKS: Well, we're asserting one,  
12:00:29 21 and I'm advising the deponent to not answer.  
12:00:34 22 MR. MALONEY: How can you instruct him

12:00:36 1 not to answer her -- Ms. Peebles saying something  
12:00:38 2 about you, Mr. Marks? That's not privileged.  
12:00:40 3 MR. MARKS: You don't have to answer  
12:00:40 4 the question, Mr. Jackson.  
12:00:40 5 BY MR. MALONEY:  
12:00:42 6 Q Are you declining to answer the  
12:00:45 7 question?  
12:00:46 8 A Yep.  
12:00:46 9 Q All right. Are you following the  
12:00:47 10 instructions of Mr. Marks in that regard?  
12:00:49 11 A Yes.  
12:00:50 12 Q Were you involved in any of the matters  
12:00:51 13 involving the Redskins?  
12:00:52 14 A Yes.  
12:00:53 15 Q Tell me your involvement with that.  
12:00:58 16 A In '09, I think it was in July,  
12:01:04 17 Mike Dillow (phonetics), Donaldson --  
12:01:10 18 Mr. Donaldson, the lawyer at the Redskins, Isaac  
12:01:16 19 Marks, Denise Killen, myself and the apostle, we  
12:01:24 20 had a meeting in her -- in her office. And the  
12:01:27 21 Redskins said they were downsizing, and they would  
12:01:32 22 no longer need our lot for permit parking;

12:01:37 1 they were open a -- a new lot on the corner of  
12:01:44 2 Brightseat Road and Redskins Road.  
12:01:49 3 Q Uh-huh.  
12:01:50 4 A And they -- they no longer, you know,  
12:01:52 5 wanted to use our lot for permit parking.  
12:01:56 6 Q Uh-huh. And was this a meeting that  
12:01:58 7 had been initiated by the Redskins or by the  
12:02:01 8 church?  
12:02:02 9 A Redskins.  
12:02:02 10 Q Okay. And who was present besides you  
12:02:04 11 and Mike Dillow?  
12:02:09 12 A Myself, Mike Dillow, the attorney for  
12:02:10 13 the Redskins, Mr. Donaldson --  
12:02:16 14 Q Uh-huh.  
12:02:14 15 A -- Isaac Mark (sic) --  
12:02:18 16 Q Uh-huh.  
12:02:17 17 A -- Denise Killen and the apostle.  
12:02:20 18 Q Okay. And how long -- when did this  
12:02:23 19 meeting take place in relationship to the  
12:02:25 20 pastor's -- to the apostle's death?  
12:02:28 21 A Repeat your question.

12:02:29 22 Q How -- how long before the apostle died

0164

12:02:31 1 did this meeting take place?

12:02:34 2 A It was sometime in -- I believe in July  
12:02:36 3 '09.

12:02:37 4 Q Was Pastor Joel there?

12:02:38 5 A No.

12:02:39 6 Q Has Pastor Joel ever been at any  
12:02:41 7 Redskin meetings that you're aware of?

12:02:44 8 A Yes.

12:02:44 9 Q And when was that?

12:02:51 10 A I guess couple years or so prior to  
12:02:53 11 that.

12:02:54 12 Q Okay. So there was a prior meeting a  
12:02:56 13 couple years before; is that correct?

12:02:58 14 A Uh-huh.

12:02:58 15 Q And who was there?

12:03:01 16 A Well, we went up to the Redskins.

12:03:04 17 Q Uh-huh.

12:03:05 18 A It was -- it was Joel and myself and  
12:03:08 19 Mike Dillow.

12:03:10 20 Q Uh-huh. And anyone else?

12:03:13 21 A It might have been someone else from  
12:03:15 22 the Redskins that I'm not aware of.

0165

12:03:18 1 Q Okay. What was the purpose of that  
12:03:20 2 meeting?

12:03:20 3 A I guess to renew the contract.

12:03:22 4 Q And what happened at that meeting?

12:03:23 5 A The contract was renewed.

12:03:24 6 Q And what were the terms of that  
12:03:26 7 contract, if you know?

12:03:27 8 A I -- I don't -- I -- I don't know at --  
12:03:30 9 at the time. I don't have it in front of me, so I  
12:03:34 10 couldn't tell you.

12:03:35 11 Q Would it refresh your recollection if I  
12:03:37 12 told you that it provided the church up to  
12:03:39 13 \$1.2 million a year?

12:03:40 14 A Probably.

12:03:41 15 Q Okay. And how long was that contract  
12:03:42 16 term for?

12:03:44 17 A It just from one year to -- to the  
12:03:46 18 next -- just one year -- one season.

12:03:48 19 Q All right. And how many seasons did

12:03:51 20 that arrangement remain in effect until things  
12:03:53 21 changed?  
12:03:58 22 A I want to say at least three years we

0166

12:04:00 1 had that arrangement.  
12:04:02 2 Q All right. And was that a good  
12:04:03 3 arrangement for the church?  
12:04:05 4 A Yes, very good.  
12:04:06 5 Q And why was it a very good arrangement  
12:04:07 6 for the church?  
12:04:09 7 A Well, I mean, the money was -- and as  
12:04:11 8 far as working, there's concern we didn't have to  
12:04:13 9 worry about, you know, checking people in; we just  
12:04:22 10 had to just watch the -- the permit and let them  
12:04:26 11 in, wave them in, and whether they showed up or  
12:04:29 12 not, the money was guaranteed.  
12:04:31 13 Q And now you have to handle cash?  
12:04:33 14 A Yes.  
12:04:33 15 Q And is that what happened as a result  
12:04:36 16 of the second meeting that you started to  
12:04:40 17 describe?  
12:04:41 18 A The last meeting?  
12:04:43 19 Q Yes.  
12:04:43 20 A Yep.  
12:04:44 21 Q And that was the meeting involving  
12:04:45 22 Mr. Dillow, yourself, Mr. Marks and a lawyer from

0167

12:04:49 1 the Redskins?  
12:04:50 2 A Yes, and the apostle.  
12:04:52 3 Q And the apostle.  
12:04:53 4 A And Denise Killen.  
12:04:54 5 Q And what did the Redskins say at that  
12:04:56 6 meeting?  
12:04:57 7 A That they were downsizing; that they  
12:05:01 8 were not going to need our -- our lot for permit  
12:05:05 9 parking because they had just op -- opened up  
12:05:08 10 their lot, a new lot.  
12:05:10 11 Q That's the one at Brightseat Road?  
12:05:13 12 A That's correct.  
12:05:13 13 Q Did they offer you any alternative  
12:05:15 14 arrangement?  
12:05:16 15 A Well, they said that if they need our  
12:05:18 16 lot, that they would, you know, negotiate.  
12:05:23 17 Q And what was the response of the

12:05:25 18 church?  
12:05:27 19 A The pastor agreed to that. At the  
12:05:34 20 meantime, she was saying that, you know, we're  
12:05:37 21 going with the cash parking.  
12:05:38 22 Q Okay. And were the Redskins advised of

0168

12:05:41 1 that?  
12:05:42 2 A Yeah.  
12:05:42 3 Q All right. So there was no  
12:05:44 4 agreement -- the agreement was simply allowed to  
12:05:47 5 expire; is that right?  
12:05:51 6 A That's correct.  
12:05:51 7 Q All right. And when it went to cash  
12:05:53 8 parking, what has happened to the revenue as a  
12:05:56 9 result of the cash parking?  
12:05:57 10 A It -- it went down.  
12:05:58 11 Q And who is in charge of collecting the  
12:05:59 12 money from the parking?  
12:06:01 13 A I -- myself.  
12:06:05 14 Q And who --  
12:06:06 15 A And I had other people on each lot  
12:06:08 16 collecting the money.  
12:06:09 17 Q And they turn it into you?  
12:06:11 18 A They -- I come to the lot where the  
12:06:14 19 police would be on each lot.  
12:06:17 20 Q Uh-huh.  
12:06:17 21 A There'd be a policeman with me at all  
12:06:19 22 time --

0169

12:06:20 1 Q Uh-huh.  
12:06:20 2 A -- collecting the money, and I would  
12:06:21 3 collect the money, and I would turn it into --  
12:06:25 4 with the policeman going into the finance office,  
12:06:30 5 giving it to Ann Wesley and Jennie Jackson.  
12:06:38 6 Q Did you ever take the money and put it  
12:06:39 7 in your trunk from the Redskin parking and take it  
12:06:43 8 home with you?  
12:06:44 9 A Never.  
12:06:44 10 Q Did you ever take any of the money home  
12:06:46 11 with you?  
12:06:46 12 A Never.  
12:06:47 13 Q Did you always remit it to Ann Wesley  
12:06:50 14 in the finance office?  
12:06:51 15 A That's correct.



12:06:51 16 Q Who actually counts the proceeds from  
12:06:53 17 the Redskin parking?  
12:06:55 18 A Ann Wesley, Jennie Jackson and  
12:06:57 19 Dorothy Williams.  
12:06:58 20 Q Have you ever given any person any  
12:06:59 21 proceeds from the Redskin parking for any purpose,  
12:07:02 22 to reimburse them, or because there were expenses,

0170

12:07:06 1 or for any other reason?  
12:07:11 2 A Yes.  
12:07:11 3 Q Who was that?  
12:07:11 4 A That would be the cook that would cook  
12:07:12 5 us some food --  
12:07:12 6 Q Uh-huh.  
12:07:12 7 A -- and the police officer.  
12:07:15 8 Q You paid -- you paid the police officer  
12:07:17 9 in cash?  
12:07:17 10 A Yep.  
12:07:18 11 Q Which police officer was that?  
12:07:20 12 A They different ones. Sometime it's  
12:07:22 13 sheriff department.  
12:07:26 14 Q Uh-huh.  
12:07:26 15 A They would sign a -- a -- a invoice.  
12:07:32 16 Q Uh-huh. And what were the names of  
12:07:34 17 these deputy sheriffs or police officers who would  
12:07:37 18 do this?  
12:07:37 19 A So many of them, so I couldn't tell  
12:07:39 20 you.  
12:07:40 21 Q How about the workers on the -- how  
12:07:41 22 much were the police officers paid?

0171

12:07:43 1 A They would get \$40 an hour.  
12:07:45 2 Q Uh-huh.  
12:07:45 3 A And they would -- sometime they work  
12:07:47 4 the minimum of five hours.  
12:07:49 5 Q Uh-huh. So they get about \$200 a game?  
12:07:51 6 A Right.  
12:07:52 7 Q And who went -- went about the business  
12:07:56 8 of recruiting these officers? In other words, how  
12:07:59 9 were they obtained for these events?  
12:08:01 10 A Well, it's a -- it's a same group that  
12:08:08 11 secure the church on Sundays, or anytime we have  
12:08:11 12 concert --  
12:08:12 13 Q Uh-huh.

12:08:12 14 A -- they have a leader there that does  
12:08:14 15 that.  
12:08:15 16 Q Uh-huh. Do you know -- who is that  
12:08:16 17 person?  
12:08:17 18 A Michael Sims.  
12:08:17 19 Q Uh-huh. And who is Michael Sims?  
12:08:19 20 A He's a deputy sheriff.  
12:08:23 21 Q And do you use Michael Sims to  
12:08:25 22 basically obtain other part-time officers?

0172

12:08:28 1 A Yeah.  
12:08:29 2 Q And are they deputy sheriffs or Prince  
12:08:31 3 George's County police --  
12:08:33 4 A Both.  
12:08:34 5 Q -- or both?  
12:08:35 6 Are they primarily sheriffs or a  
12:08:39 7 mixture of --  
12:08:41 8 A Both. Mixture.  
12:08:42 9 Q The -- with respect to the revenue as a  
12:08:45 10 result of this change in the arrangement, what has  
12:08:47 11 happened to the Redskins parking revenue?  
12:08:50 12 A What -- I don't understand your  
12:08:52 13 question.  
12:08:52 14 Q What has happened to the Redskins  
12:08:56 15 parking?  
12:08:58 16 A You mean on our lots?  
12:08:59 17 Q Yeah. In other words what --  
12:09:01 18 A It has increased.  
12:09:02 19 Q In other words, you get --  
12:09:03 20 A In this last game -- this last season.  
12:09:06 21 Q No, but how has it worked out compared  
12:09:08 22 to the old arrangement with the Redskins?

0173

12:09:10 1 A We -- we don't get as much.  
12:09:11 2 Q Okay. How much has it gone down, if  
12:09:13 3 you know?  
12:09:14 4 A Oh, gee, quite a bit.  
12:09:17 5 Q Uh-huh. Go from 1.2 million to about  
12:09:20 6 600,000?  
12:09:22 7 A Well, last year they -- it was 800,000.  
12:09:25 8 Q Uh-huh. And how about this year?  
12:09:29 9 A We haven't started.  
12:09:31 10 Q Okay. And what was it the year before?  
12:09:34 11 A 400,000.

12:09:35 12 Q So it went from 400,000 to 800,000?  
12:09:38 13 A Uh-huh.  
12:09:38 14 Q Did it go from 1.2 million to 400,000  
12:09:41 15 when the arrangement changed?  
12:09:46 16 A One point -- well, that's when they had  
12:09:47 17 permit parking.  
12:09:48 18 Q Right. I'm saying --  
12:09:48 19 A Yeah.  
12:09:50 20 Q So it went from 1.2 million to 400,000;  
12:09:52 21 is that correct?  
12:09:53 22 A That's correct.

0174

12:09:54 1 Q How many --  
12:09:54 2 A Because the Redskins took their permit  
12:09:57 3 parking to the other lot.  
12:09:59 4 Q I understand your testimony. So  
12:10:01 5 with respect -- how many people work at the  
12:10:03 6 parking lots other than law enforcement?  
12:10:06 7 A People who collecting the money.  
12:10:08 8 Q And how many of those people?  
12:10:10 9 A I have five -- five people --  
12:10:13 10 Q Uh-huh.  
12:10:13 11 A -- collecting the money and about --  
12:10:16 12 about 12 or 13 people directing them to park.  
12:10:20 13 Q And do you hire those people?  
12:10:22 14 A Yeah, some of them are church members.  
12:10:24 15 Q And how much are they paid?  
12:10:26 16 A They're volun -- they're -- they're --  
12:10:28 17 they're volunteer from the -- the ministry that we  
12:10:36 18 have the contract with.  
12:10:38 19 Q And what ministry is that?  
12:10:40 20 A Save the Seed Ministry.  
12:10:42 21 Q So, in other words, you contract with a  
12:10:44 22 Save the Seed Ministry for these workers?

0175

12:10:47 1 A Uh-huh.  
12:10:47 2 Q Is that a yes? You have to give a --  
12:10:50 3 A Yes.  
12:10:50 4 Q And what is the Save the Seed Ministry?  
12:10:53 5 A It's a ministry of -- of a group of --  
12:10:59 6 a group of guys that come into the ministry to --  
12:11:04 7 you know, have problems.  
12:11:06 8 Q And is that a ministry of Jericho?  
12:11:08 9 A No.

12:11:08 10 Q So who runs the Save the Seed Ministry?  
12:11:15 11 A Who was the Save?  
12:11:18 12 Q Yes. In other words, it's a -- it's  
12:11:20 13 a --  
12:11:20 14 A It's a contract. It's a -- it's a  
12:11:22 15 ministry for recovering addicts.  
12:11:24 16 Q All right. So do I understand the way  
12:11:26 17 this works is Jericho has a contract with Save the  
12:11:29 18 Seed --  
12:11:29 19 A Uh-huh.  
12:11:29 20 Q -- where it pays Save the Seed a  
12:11:32 21 certain amount of money, and they bring their  
12:11:34 22 volunteers over to work; is that core --

0176

12:11:37 1 A Well, they're -- they're people that --  
12:11:39 2 that -- that normally work during the week --  
12:11:40 3 Q Uh-huh.  
12:11:40 4 A -- for the church, and they help out on  
12:11:42 5 Sundays when I have games.  
12:11:45 6 Q Oh, so the Save the Seed people also  
12:11:47 7 work at the church?  
12:11:48 8 A Yeah.  
12:11:49 9 Q Are they paid at the church or  
12:11:50 10 volunteers?  
12:11:51 11 A They're paid at the church.  
12:11:52 12 Q And what do they do?  
12:11:53 13 A They're -- they're paid through the --  
12:11:55 14 Q Save the Seed?  
12:11:56 15 A -- contract, right.  
12:11:57 16 Q So is that between them and Save the  
12:11:58 17 Seed as to how much they make? In other words, do  
12:12:02 18 you determine their compensation or does Save the  
12:12:04 19 Seed decide that?  
12:12:06 20 A No, I don't -- I don't determine that.  
12:12:12 21 Q And how much is the contract with Save  
12:12:13 22 the Seed?

0177

12:12:13 1 A Their normal contract is --  
12:12:17 2 Q Uh-huh.  
12:12:17 3 A -- I'll be guessing at it.  
12:12:19 4 Q Uh-huh. Well, don't guess. How long  
12:12:21 5 has this arrangement been in place?  
12:12:23 6 A Since '98.  
12:12:24 7 Q And who do you deal with at Save the

12:12:26 8 Seed?  
12:12:29 9 A Dr. Freeman.  
12:12:31 10 Q Uh-huh. What's his first name?  
12:12:38 11 A Mike Freeman -- Mike Freeman.  
12:12:42 12 Q And of the Jericho volunteers who work  
12:12:45 13 the Redskin parking lot, the ones who are not  
12:12:50 14 associated with Save the Seed, how are they paid?  
12:12:52 15 A They -- they get paid.  
12:12:54 16 Q And what do they get paid?  
12:12:55 17 A They get paid \$200 a game.  
12:12:57 18 Q All right. And who are those  
12:12:58 19 individuals?  
12:13:04 20 A Doug Whitter (phonetics).  
12:13:20 21 Q Uh-huh.  
12:13:20 22 MR. MALONEY: Turn the air back on.

0178

12:13:20 1 THE WITNESS: Doug Whitter. Gee, I  
12:13:30 2 know them right off. I can't even think of their  
12:13:33 3 names. I work with them every day.  
12:13:34 4 BY MR. MALONEY:  
12:13:35 5 Q Are they paid in cash?  
12:13:36 6 A Cash, yeah.  
12:13:37 7 Q At the time that the board of trustees  
12:13:41 8 that you say was appointed in March of 2009, do  
12:13:45 9 you recall anything that -- were you there when  
12:13:48 10 William Meadows did or said anything?  
12:13:54 11 A Repeat the question.  
12:13:55 12 Q At the time that you say the board of  
12:13:57 13 trustees was appointed in March of 2009, were you  
12:14:01 14 there when William Meadows said or did anything?  
12:14:06 15 A No.  
12:14:08 16 Q And did you see any other members of  
12:14:12 17 the church sign any documents that day?  
12:14:14 18 A No.  
12:14:15 19 Q Did Betty Peebles explain to you why  
12:14:18 20 she was making the change?  
12:14:21 21 A No.  
12:14:22 22 Q Did you see Betty Peebles sign any

0179

12:14:26 1 documents?  
12:14:27 2 A No.  
12:14:28 3 Q Did you understand that Isaac Marks had  
12:14:30 4 prepared the documents for the board change?  
12:14:33 5 A No.

12:14:33 6 Q Did you have any idea who had prepared  
12:14:34 7 those documents?  
12:14:35 8 A No, I didn't.  
12:14:38 9 Q There were members who resigned  
12:14:39 10 afterwards, including LaShonda Terrell. Do you  
12:14:45 11 recall about that?  
12:14:46 12 A Her name is down there, but that's the  
12:14:48 13 only way I recall.  
12:14:50 14 Q All right. Do you know why -- did she  
12:14:51 15 resign her membership from Jericho?  
12:14:53 16 A No, I don't.  
12:14:54 17 Q Did she leave the Jericho congregation?  
12:14:56 18 A Yes.  
12:14:57 19 Q Why did she leave the Jericho  
12:14:59 20 congregation?  
12:15:00 21 A I have no idea.  
12:15:01 22 Q I'm going to show you if you turn to

0180

12:15:03 1 tab 21 and take a look at this.  
12:15:42 2 A Is this 21? Okay. (Witness reviews  
12:16:05 3 document.)  
12:16:20 4 Q Do you see that?  
12:16:20 5 A Yep.  
12:16:22 6 Q And what is that?  
12:16:24 7 A Her resignation from the church --  
12:16:29 8 Q Uh-huh.  
12:16:29 9 A -- and the board.  
12:16:31 10 Q Have you ever seen that before today?  
12:16:33 11 A This is the first time I've seen this.  
12:16:36 12 Q The -- do you have any information or  
12:16:39 13 knowledge as to why LaShonda Terrell left the  
12:16:44 14 board and left the church?  
12:16:45 15 A I have no idea.  
12:16:46 16 Q Show you the next tab, which is tab  
12:16:49 17 number 22. This is the resignation of  
12:16:53 18 Jamie Jackson from the board.  
12:16:57 19 Do you know anything about  
12:16:58 20 Jamie Jackson's resignation from the board?  
12:17:01 21 A No, I don't.  
12:17:02 22 MR. MARKS: I believe that's Jennie.

0181

12:17:04 1 MR. MALONEY: Is that Jennie? Thank  
12:17:05 2 you.  
12:17:05 3 BY MR. MALONEY:

12:17:06 4 Q Showing you the next tab, tab 23,  
12:17:09 5 Bruce Landsdowne's resignation from the board.  
12:17:13 6 Do you know anything about the  
12:17:16 7 resignation of Bruce Landsdowne?  
12:17:19 8 A No, I don't.  
12:17:20 9 Q Did Bruce Landsdowne also leave the  
12:17:23 10 church?  
12:17:26 11 A Yeah.  
12:17:26 12 Q Why did Bruce Landsdowne leave the  
12:17:28 13 church?  
12:17:29 14 A I have no idea.  
12:17:30 15 Q Showing you tab 24, the resignation of  
12:17:35 16 Norma Lewis from the board of trustees.  
12:17:40 17 Do you know why Norma Lewis resigned  
12:17:44 18 from the board of trustees?  
12:17:47 19 A No.  
12:17:47 20 Q Is this the same Norma Lewis who is the  
12:17:50 21 administrator of the Prince George's Liquor Board?  
12:17:53 22 A What now?

0182

12:17:54 1 Q Is this the same Norma Lewis who  
12:17:58 2 administers the Liquor Board or another  
12:18:02 3 Norma Lewis?  
12:18:03 4 A Liquor Board?  
12:18:04 5 Q You have no knowledge about that?  
12:18:06 6 A No knowledge of that.  
12:18:07 7 Q Okay. Showing you tab 25, the  
12:18:09 8 resignation of Dorothy Williams from the board.  
12:18:12 9 Do you know anything about Ms. Williams  
12:18:14 10 resigning from the board?  
12:18:15 11 A No.  
12:18:16 12 Q Showing you tab 26, the election of  
12:18:19 13 Clifford Boswell to be a trustee.  
12:18:22 14 Do you know anything about this?  
12:18:24 15 A Is that Boswell?  
12:18:25 16 Q Yes.  
12:18:26 17 A Yes, I do know that.  
12:18:28 18 Q What do you know about this?  
12:18:29 19 A That we voted him on the board.  
12:18:31 20 Q What were the circumstances under which  
12:18:33 21 Mr. -- Mr. Boswell was voted onto the board at the  
12:18:36 22 same time that these other individuals resigned?

0183

12:18:38 1 A The pastor requested him to be on the

12:18:40 2 board.  
12:18:40 3 Q Did she tell you why?  
12:18:41 4 A No.  
12:18:42 5 Q Was there ever, with respect to the  
12:18:43 6 March 9th -- March 2009 purported election of the  
12:18:48 7 board of directors, was there ever an actual  
12:18:53 8 meeting to elect those directors, where people got  
12:18:57 9 together in a room and met?  
12:18:59 10 MR. MARKS: Let me object to that  
12:19:00 11 question for lack of foundation.  
12:19:01 12 But you may answer if you know.  
12:19:03 13 THE WITNESS: Would you repeat your  
12:19:04 14 question again, please?  
12:19:05 15 BY MR. MALONEY:  
12:19:05 16 Q When you say that you and the other  
12:19:07 17 individuals who are sitting here today were  
12:19:09 18 elected to the board of trustees on March 15th of  
12:19:12 19 2009, was there ever an actual meeting that was  
12:19:19 20 called for that purpose?  
12:19:21 21 A Not that I'm aware of.  
12:19:22 22 Q Was there ever any notice of a meeting

0184

12:19:24 1 that was called for that purpose that you're aware  
12:19:26 2 of?  
12:19:26 3 A No, I'm not aware.  
12:19:30 4 Q Was there ever any actual election that  
12:19:32 5 you're aware of? That you're aware of?  
12:19:37 6 A Prior to --  
12:19:38 7 Q At March 15th, 2009. When you say that  
12:19:41 8 you and the other purported members of the board  
12:19:45 9 of directors -- and I'm referring specifically to  
12:19:50 10 Ms. McClam-MaGruder, Ms. Killen, yourself, were  
12:19:55 11 purportedly elected to the board on March 15th,  
12:19:59 12 2009, my -- as well as the others who resigned,  
12:20:01 13 was there ever an actual election where people  
12:20:04 14 cast ballots to elect those individuals, including  
12:20:07 15 yourself, as trustees?  
12:20:13 16 MR. MARKS: Let me --  
12:20:13 17 BY MR. MALONEY:  
12:20:13 18 Q That you're -- that you're aware of?  
12:20:16 19 MR. MARKS: Let me object to the  
12:20:17 20 question in the sense that this deponent was not a  
12:20:20 21 trustee at that time.  
12:20:23 22 MR. MALONEY: Uh-huh.



12:20:22 1 MR. MARKS: So there's no foundation.  
 12:20:24 2 But you may answer if you know.  
 12:20:27 3 THE WITNESS: I'm not aware of it.  
 12:20:31 4 BY MR. MALONEY:  
 12:20:31 5 Q Are you aware of any limitation on --  
 12:20:34 6 in the bylaws that would have required  
 12:20:39 7 Mr. Landsdowne or Ms. Terrell or Ms. Lewis to  
 12:20:44 8 resign from the board of trus -- or Ms. Jackson to  
 12:20:48 9 resign from the board of trustees?  
 12:20:50 10 A No.  
 12:20:51 11 MR. MARKS: Let me object to the  
 12:20:53 12 question. The deponent has stated he did not have  
 12:20:55 13 the bylaws before him, so he was not familiar with  
 12:20:57 14 them.  
 12:20:57 15 BY MR. MALONEY:  
 12:20:58 16 Q When Mr. Boswell was elected as a  
 12:21:00 17 trustee, was there ever an actual election or just  
 12:21:02 18 the document that was signed?  
 12:21:21 19 A I don't want to guess at it.  
 12:21:24 20 Q I don't want you to guess. I'll ask  
 12:21:26 21 you a more simpler question, then.  
 12:21:28 22 Do you have any specific recollection,

12:21:29 1 sitting here today, of an actual meeting being  
 12:21:33 2 called where Mr. Boswell was elected as a trustee?  
 12:21:37 3 A Yeah, that's right. Yeah, because  
 12:21:38 4 we -- we voted him on.  
 12:21:41 5 Q All right. And with --  
 12:21:43 6 A Yeah.  
 12:21:43 7 Q -- respect to the resolution that  
 12:21:45 8 elected him, Resolution 0409, are you aware of  
 12:21:49 9 what Resolutions 0209 or 0309 provide?  
 12:21:55 10 A Yeah, the 0209 is that when we changed  
 12:22:00 11 the Jericho Baptist Church Industry to Jericho  
 12:22:10 12 Baptist Church Ministry.  
 12:22:13 13 Q And what was 03?  
 12:22:15 14 A I think the 03 was revise the update of  
 12:22:20 15 the bylaws on March the 15th.  
 12:22:23 16 Q Now, with respect to the change of the  
 12:22:29 17 name, do you have any recollection as to what  
 12:22:30 18 happened and why with respect to the change of the  
 12:22:31 19 name?  
 12:22:31 20 A Yeah. Well, we had problems -- Pastor  
 12:22:34 21 had problems with the name change due to there was

12:22:38 22 another church with the same name that we had.

0187

12:22:43 1 Q Was there ever any communication with  
12:22:44 2 that church?

12:22:46 3 A I'm not aware of it.

12:22:48 4 Q How about the change in the  
12:22:50 5 organization of the church to make it a Maryland  
12:22:53 6 corporation? Do you have any recollection about  
12:22:55 7 any of that?

12:23:04 8 A The -- the board felt that -- that we  
12:23:05 9 need to change that to a Maryland corporation  
12:23:08 10 because we had mostly all our properties in -- in  
12:23:12 11 Maryland.

12:23:14 12 Q And what was your position with respect  
12:23:16 13 to that change?

12:23:16 14 A I agreed to it.

12:23:20 15 Q Was the congregation or Joel Peebles  
12:23:22 16 ever given notice of any of that?

12:23:25 17 A I'm not aware of that.

12:23:26 18 Q And was there actually a board meeting  
12:23:29 19 that was called for that purpose?

12:23:30 20 A Yes.

12:23:30 21 Q And when would that meeting take place?

12:23:41 22 A I want to say sometime in early part of

0188

12:23:44 1 December '10; somewhere maybe December '10,  
12:23:53 2 somewhere in -- in that neighborhood.

12:23:54 3 Q December of what year?

12:23:56 4 A Early December.

12:23:59 5 Q That be of 2010?

12:24:01 6 A Yes.

12:24:03 7 Q Are board members compensated for  
12:24:05 8 either attending meetings or for their service on  
12:24:08 9 the board?

12:24:08 10 A No.

12:24:09 11 Q Are board members reimbursed for any  
12:24:11 12 expenses for any of them?

12:24:16 13 A No.

12:24:17 14 Q Do you have a plan at the church which  
12:24:19 15 is known as a 403 plan?

12:24:21 16 A No.

12:24:21 17 Q Do you have any -- your contract of  
12:24:23 18 employment provides for the creation of such a  
12:24:27 19 plan, a 403(b)(7) plan, back in 2007. Was such a

12:24:35 20 plan ever established?  
12:24:36 21 A I had one, but I took it out because it  
12:24:38 22 wasn't doing anything for me.

0189

12:24:40 1 Q In other words, you withdrew the  
12:24:41 2 balance from the 403(b)(7)?  
12:24:44 3 A Yes.  
12:24:44 4 Q And when did you do that?  
12:24:46 5 A I -- I don't even -- it was early part  
12:24:48 6 of 2000-something. I don't know.  
12:24:51 7 Q Do any other members of the board of  
12:24:53 8 trustees have 403(b)(7) or other retirement plans  
12:24:57 9 that you are aware of?  
12:24:59 10 A I'm not aware of it.  
12:25:00 11 Q With respect to any expenditures over  
12:25:03 12 \$10,000, since March of 2009, have any been  
12:25:06 13 authorized by the purported board?  
12:25:10 14 A Yes.  
12:25:10 15 Q And what are they?  
12:25:12 16 A We just -- a hot water tank we had to  
12:25:18 17 replace, it was like \$12,000.  
12:25:20 18 Q Okay. Anything else?  
12:25:23 19 A That's all I can remember.  
12:25:29 20 Q Since March 15th of 2009, has the board  
12:25:30 21 authorized any loans or indebtedness?  
12:25:34 22 A Repeat your question.

0190

12:25:35 1 Q Since March 15th of 2009, has the  
12:25:39 2 purported board authorized any loans or  
12:25:43 3 indebtedness?  
12:25:47 4 A Yes, I think -- yes.  
12:25:49 5 Q And what were those?  
12:25:51 6 A Those was due to the Center of Hope.  
12:25:57 7 Q I'm sorry. I don't understand your  
12:26:00 8 answer.  
12:26:01 9 A The Jericho Center of Hope.  
12:26:04 10 Q And what was the --  
12:26:04 11 A The --  
12:26:05 12 Q Right.  
12:26:05 13 A To try to get a refinance.  
12:26:06 14 Q Uh-huh. And what was the nature of the  
12:26:08 15 authorization?  
12:26:10 16 A I think we had to pay the -- certain  
12:26:17 17 amount to -- to get some research done for it.

12:26:22 18 Q When you say "research," what do you  
12:26:26 19 mean by that?  
12:26:27 20 A Well, to try to obtain a loan.  
12:26:29 21 Q Have you or has the board been notified  
12:26:32 22 that there'll be no further loans or guarantees or

0191

12:26:35 1 financing from any lending institution until this  
12:26:37 2 current dispute is resolved?  
12:26:42 3 A No, I'm not aware of that.  
12:26:44 4 Q You're not aware of that at all?  
12:26:45 5 A No.  
12:26:46 6 Q Do you, yourself, deal with any banking  
12:26:48 7 officers or any employees of any of the financial  
12:26:51 8 institutions that hold money for the -- Jericho,  
12:26:55 9 including Bank of America, the Harbor Bank, the  
12:26:58 10 Industrial Bank and PNC Bank?  
12:27:01 11 A I don't understand the question.  
12:27:02 12 Q Of those four banks, are you aware --  
12:27:06 13 do you, yourself, deal with anyone at those banks?  
12:27:10 14 A Yes.  
12:27:10 15 Q Who do you deal with?  
12:27:11 16 A Bank of America.  
12:27:12 17 Q And who at Bank of America do you deal  
12:27:14 18 with?  
12:27:16 19 A Their Largo office.  
12:27:18 20 Q Uh-huh. And what specific individual?  
12:27:20 21 A No individual.  
12:27:21 22 Q All right. And when you say you deal

0192

12:27:22 1 with them, what have been the nature of your  
12:27:25 2 contacts with the Largo branch office of the Bank  
12:27:29 3 of America?  
12:27:29 4 A Just got -- that's where my  
12:27:32 5 checking and -- checking and -- and savings.  
12:27:34 6 Q I'm not asking about your personal  
12:27:36 7 checking and savings.  
12:27:37 8 A Oh, no, nothing.  
12:27:39 9 Q I'm asking about on behalf of the  
12:27:41 10 church.  
12:27:41 11 A Nothing.  
12:27:42 12 Q So is that something that's left to the  
12:27:43 13 finance office?  
12:27:44 14 A Yes.  
12:27:44 15 Q Okay. Are you aware, as a director, of

12:27:46 16 the Jericho having any banking relationships other  
12:27:50 17 than with those four financial institutions?  
12:27:52 18 A That's all I'm aware of.  
12:27:53 19 Q All right. And with respect to those  
12:27:56 20 four financial institutions, which of those do you  
12:27:58 21 have any signature authority other than the one  
12:28:01 22 that you've told us about with respect to Bank of

0193

12:28:04 1 America?  
12:28:05 2 A That's the only one I'm aware of.  
12:28:07 3 Q All right. Are you -- do you also hold  
12:28:20 4 the title of assistant chief executive officer --  
12:28:21 5 A Yes.  
12:28:22 6 Q -- at Jericho?  
12:28:22 7 And when did you obtain that title?  
12:28:24 8 A Somewhere in either December or --  
12:28:28 9 yeah, December, I think, of '10.  
12:28:32 10 MR. MARKS: I'm sorry, Counsel, did you  
12:28:34 11 say assistant chief executive officer --  
12:28:36 12 MR. MALONEY: Yes.  
12:28:36 13 MR. MARKS: -- or chief?  
12:28:36 14 THE WITNESS: Oh, chief, no.  
12:28:38 15 MR. MALONEY: Well, let me ask him to  
12:28:41 16 tell us what the title is.  
12:28:43 17 MR. MARKS: You'll have to speak up.  
12:28:45 18 Mr. Jackson has a hearing aid.  
12:28:47 19 BY MR. MALONEY:  
12:28:47 20 Q Oh, I'm sorry, Mr. Jackson. Anytime if  
12:28:49 21 you don't understand or can't hear me, you just  
12:28:52 22 say so, and I'll be glad to rephrase the question.

0194

12:28:55 1 Okay?  
12:28:56 2 A (Witness nods head.)  
12:28:56 3 Q Is that a yes?  
12:28:57 4 A Yes.  
12:28:57 5 Q All right. Did you, on or about  
12:28:59 6 December 2010, have a change in your title at  
12:29:01 7 Jericho?  
12:29:02 8 A Yes, through the board, was the  
12:29:03 9 assistant COO.  
12:29:05 10 Q COO?  
12:29:05 11 A Yeah.  
12:29:06 12 Q Is that chief operating officer?  
12:29:08 13 A Yes.

12:29:08 14 Q And how did that change in your title  
12:29:10 15 come about?  
12:29:10 16 A The board made that appointment.  
12:29:14 17 Q Yeah. And who initiated that process  
12:29:15 18 on the board; which board members?  
12:29:17 19 A Well, all of us.  
12:29:18 20 Q Well, did all five of you speak up at  
12:29:20 21 once, or what happened?  
12:29:25 22 A I -- I think what it was, that we -- we

0195

12:29:28 1 voted on it. I -- I don't quite remember how --  
12:29:37 2 how it actually, you know, it was done, but I know  
12:29:41 3 the board -- all of us agreed on that position.  
12:29:44 4 Q I mean, I'm really asking you who came  
12:29:45 5 up with the idea?  
12:29:54 6 A The -- I guess the vice chair.  
12:29:57 7 MR. MARKS: Don't guess.  
12:29:58 8 BY MR. MALONEY:  
12:29:58 9 Q And who is the vice chair?  
12:30:01 10 A Glo -- Gloria MaGruder.  
12:30:03 11 THE COURT REPORTER: I'm sorry?  
12:30:03 12 THE WITNESS: Gloria MaGruder.  
12:30:03 13 BY MR. MALONEY:  
12:30:04 14 Q And what reasons did she give as to why  
12:30:06 15 you should get this title?  
12:30:07 16 A Well, because I work closely with the  
12:30:09 17 operation of the church --  
12:30:10 18 Q Uh-huh.  
12:30:11 19 A -- on a daily basis.  
12:30:12 20 Q Is this something that she discussed  
12:30:13 21 with you prior to the time that you got the title  
12:30:18 22 or she proposed it?

0196

12:30:20 1 A She opposed (sic) it.  
12:30:21 2 Q Well, what did she say to you about  
12:30:22 3 that?  
12:30:23 4 A Well, she was saying that, you know,  
12:30:25 5 because I -- what I do at the church, that that  
12:30:28 6 would be a good position for me.  
12:30:29 7 Q And did the board have a -- have a --  
12:30:33 8 give notice of a meeting to discuss giving you  
12:30:35 9 this title?  
12:30:36 10 A We had that meeting at the time.  
12:30:37 11 Q Uh-huh. And are you -- so that I

12:30:40 12 understand your title, are you assistant chief  
12:30:43 13 operating officer or assistant chief executive  
12:30:48 14 officer?  
12:30:49 15 A Op -- operating officer.  
12:30:49 16 Q And who is the chief operating officer?  
12:30:50 17 A Denise Killen.  
12:30:52 18 Q And when did Denise get this title?  
12:30:54 19 A The same time.  
12:30:55 20 Q And with respect to this new title that  
12:30:57 21 you got, did you get any change in  
12:30:59 22 responsibilities?

0197

12:31:02 1 A No. The responsibility is the same.  
12:31:04 2 Q All right. Just a new title?  
12:31:06 3 A Yep.  
12:31:06 4 Q Did you get a different office or  
12:31:08 5 anything else, or any new benefits?  
12:31:14 6 A No, nothing different.  
12:31:14 7 THE COURT REPORTER: Wait, wait. Did  
12:31:14 8 you get a new office or anything else?  
12:31:14 9 BY MR. MALONEY:  
12:31:14 10 Q Any new benefits?  
12:31:14 11 A No.  
12:31:15 12 Q Was your salary changed at all?  
12:31:17 13 A No.  
12:31:17 14 Q Is the plan to increase your salary in  
12:31:20 15 the future to deal with this new title?  
12:31:22 16 A No.  
12:31:23 17 Q And with respect to Denise, was she  
12:31:26 18 given the title of chief operating officer by the  
12:31:28 19 purported board in the same meeting?  
12:31:30 20 A Yes.  
12:31:31 21 Q And did she get any new  
12:31:32 22 responsibilities?

0198

12:31:34 1 A No, her responsibility's the same.  
12:31:37 2 Q Was her salary changed at that point?  
12:31:39 3 A No.  
12:31:39 4 Q What do you understand her salary to  
12:31:41 5 be?  
12:31:41 6 A I don't know.  
12:31:42 7 Q What process or evaluation instrument  
12:31:47 8 does the board have to review Denise's  
12:31:51 9 performance?

12:31:55 10 A Well, her -- her -- her daily operation  
12:31:59 11 that she's been doing all along.  
12:32:01 12 Q Well, maybe you misunderstood my --  
12:32:04 13 A I mean, my --  
12:32:05 14 Q Go ahead.  
12:32:06 15 A Go ahead with your question again.  
12:32:07 16 Q In other words, does the board have in  
12:32:09 17 place anything that you are aware of that would  
12:32:11 18 provide for a performance review of Denise's  
12:32:16 19 conduct of her office?  
12:32:24 20 A Only -- only thing that I -- I can say  
12:32:28 21 is that her performance been as -- has been going  
12:32:35 22 on a daily basis with all the responsibility that

0199

12:32:38 1 she has.  
12:32:38 2 Q I'm asking you maybe a different  
12:32:39 3 question. Let me break it down so you understand  
12:32:42 4 that.  
12:32:42 5 Does the board have in -- in place a  
12:32:46 6 formal mechanism or any kind of procedure so it  
12:32:50 7 evaluates her performance, how she's doing: good,  
12:32:57 8 bad, med -- mediocre, anything?  
12:33:01 9 A Well, when we have the board meeting,  
12:33:04 10 the vice chairman go over those items that she --  
12:33:10 11 that she does and what she -- what she does --  
12:33:11 12 Q Uh-huh. Uh-huh.  
12:33:11 13 A -- and what she brings in.  
12:33:15 14 Q Well, I just --  
12:33:17 15 A That's the only evaluation I could tell  
12:33:19 16 you.  
12:33:19 17 Q But is there anything at the end of the  
12:33:21 18 year that says she's doing a good job or a bad job  
12:33:23 19 or how she's evaluated --  
12:33:26 20 A Well, I'm sure --  
12:33:27 21 Q -- or performance appraisal?  
12:33:33 22 A I'm sure we're working towards that.

0200

12:33:34 1 Q Are you aware of anything specifically  
12:33:35 2 that's been done to work towards that?  
12:33:35 3 A We had talked about it that -- you  
12:33:38 4 know, that -- you know, that we're gonna, you  
12:33:41 5 know, check the performance of the -- you know,  
12:33:49 6 our positions.  
12:33:50 7 THE COURT REPORTER: I -- I can't --



12:33:50 8 you covered your mouth. "Check the performance of  
12:33:50 9 the"?

12:33:50 10 THE WITNESS: Our positions.  
12:33:50 11 THE COURT REPORTER: Thanks.  
12:33:50 12 BY MR. MALONEY:  
12:33:50 13 Q Since the meetings that elected -- or  
12:33:52 14 strike that.  
12:33:53 15 Has there ever been an election of  
12:33:55 16 members of the trustees that has been called since  
12:33:58 17 you believe you became a trustee? Has there ever  
12:34:02 18 been an election?  
12:34:03 19 A Have there ever been an election?  
12:34:05 20 Q Yeah, an election.  
12:34:07 21 A Yeah, been election to elect Boswell to  
12:34:10 22 the board.

0201

12:34:11 1 Q Well, that one meeting you say occurred  
12:34:12 2 in May of '09?  
12:34:15 3 A Yeah.  
12:34:15 4 Q Other than that, has there ever been an  
12:34:17 5 election called?  
12:34:18 6 A An election?  
12:34:19 7 Q Election.  
12:34:20 8 A For individuals?  
12:34:21 9 Q Yes.  
12:34:22 10 A No.  
12:34:22 11 Q Is there any plans to call an election?  
12:34:24 12 A Not I'm aware of.  
12:34:25 13 Q With respect to the tax returns of  
12:34:27 14 Jericho, the 990T and the personal property taxes  
12:34:33 15 returns, have they been filed since you became  
12:34:35 16 a -- or believe you became a director in March of  
12:34:38 17 2009?  
12:34:42 18 A I'm not aware of it.  
12:34:43 19 Q Have you ever seen a 990 filed for  
12:34:46 20 Jericho?  
12:34:47 21 A No.  
12:34:48 22 Q Have you ever disclosed as a trust --

0202

12:34:51 1 as a compensated trustee your compensation on any  
12:34:55 2 tax return?  
12:34:56 3 A No, I'm not aware of it.  
12:34:58 4 Q Are there any trustees who have --  
12:35:00 5 strike that.

12:35:01 6 Have you made any effort as a trustee  
12:35:04 7 to make sure that the tax returns of Jericho had  
12:35:07 8 been filed on a timely basis?  
12:35:14 9 A Well, that --  
12:35:16 10 MR. MARKS: Let me object to that  
12:35:17 11 question. There's no foundation that he has any  
12:35:19 12 responsibility to do that, but to the extent that  
12:35:21 13 you know.  
12:35:23 14 MR. MALONEY: A -- a director?  
12:35:25 15 MR. MARKS: To the extent that you  
12:35:26 16 know, you can answer.  
12:35:28 17 BY MR. MALONEY:  
12:35:28 18 Q Let me ask you -- I'm going to rephrase  
12:35:29 19 the question based on that objection.  
12:35:31 20 As a director, do you believe you have  
12:35:32 21 any responsibility or obligation to ensure that  
12:35:34 22 the corporation has timely tax filings?

0203

12:35:37 1 A Yes.  
12:35:38 2 Q And what is that responsibility that  
12:35:40 3 you have?  
12:35:40 4 A To make sure --  
12:35:41 5 MR. MARKS: Let me object to the  
12:35:42 6 question again. There is no foundation that there  
12:35:44 7 is an obligation to file tax returns.  
12:35:46 8 BY MR. MALONEY:  
12:35:46 9 Q All right. Go ahead.  
12:35:48 10 MR. MARKS: To the extent that you  
12:35:49 11 know, you may answer.  
12:35:49 12 BY MR. MALONEY:  
12:35:50 13 Q And what is the responsibility that you  
12:35:51 14 believe you have?  
12:35:54 15 A Well, the individual that's in charge  
12:35:58 16 of that has responsibility to make sure that the  
12:36:06 17 tax has been filed in a timely manner.  
12:36:07 18 Q I'm sorry. I didn't understand your  
12:36:09 19 answer.  
12:36:11 20 A Repeat your question.  
12:36:13 21 MR. MALONEY: Can you read the question  
12:36:14 22 back?

0204

12:36:14 1 (The Record was read as requested.)  
12:36:28 2 BY MR. MALONEY:  
12:36:28 3 Q And that would be the respon -- what

12:36:31 4 responsibility do you believe you have to ensure  
12:36:33 5 timely tax filings?  
12:36:38 6 A I guess to make sure that -- that our  
12:36:42 7 tax had been filed properly and timely.  
12:36:46 8 Q And what have you done to comply with  
12:36:48 9 that responsibility?  
12:36:50 10 MR. MARKS: Objection to the question.  
12:36:51 11 Again, there is no foundation that there is a  
12:36:57 12 requirement.  
12:36:57 13 BY MR. MALONEY:  
12:36:57 14 Q Go ahead. You may answer.  
12:36:58 15 A What is your question again?  
12:36:59 16 Q And what have you done to comply with  
12:37:01 17 that responsibility and to make sure that the tax  
12:37:03 18 returns have actually been filed?  
12:37:10 19 A I hadn't done anything.  
12:37:11 20 Q Has the board done anything that you're  
12:37:12 21 aware of?  
12:37:14 22 A Yes.

0205

12:37:14 1 Q And what have they done?  
12:37:17 2 A One of the board members that's in  
12:37:20 3 charge of that has taken care of that.  
12:37:22 4 Q And who is that?  
12:37:23 5 A Dorothy Williams.  
12:37:24 6 Q When you say she's taken care of that,  
12:37:26 7 what is --  
12:37:27 8 A She -- she does it every year.  
12:37:28 9 Q Do you -- are you aware that she does  
12:37:29 10 it or are you just assuming?  
12:37:31 11 A Well, she say she does it every year.  
12:37:33 12 Q Have you ever seen the tax returns  
12:37:35 13 yourself?  
12:37:36 14 A No.  
12:37:36 15 Q All right. Are there any members of  
12:37:39 16 the board of trustees who do not receive some form  
12:37:42 17 of compensation from Jericho?  
12:37:44 18 A (Witness shakes head.) Repeat the  
12:37:48 19 question.  
12:37:48 20 Q Of this purported group that you say is  
12:37:50 21 the board of trustees, are there any of those  
12:37:53 22 individuals who do not receive any compensation

0206

12:37:56 1 from Jericho?

12:38:02 2 A As a board member?  
12:38:03 3 Q Yes.  
12:38:04 4 A None of us receive any compensation.  
12:38:06 5 Q Well, not as a board member, but as --  
12:38:08 6 in any other capacity?  
12:38:10 7 A As a -- as a worker.  
12:38:12 8 Q Yes.  
12:38:14 9 A Work staff. Yeah, myself.  
12:38:16 10 Q Anyone else -- who is -- who, on the  
12:38:18 11 board, to your knowledge, gets some form of  
12:38:20 12 remuneration, compensation, salary, stipend?  
12:38:24 13 A Myself.  
12:38:25 14 Q Uh-huh.  
12:38:26 15 A Dorothy Williams.  
12:38:27 16 Q Uh-huh.  
12:38:28 17 A Denise Killen.  
12:38:30 18 Q Uh-huh. And who does not?  
12:38:31 19 A Gloria MaGruder.  
12:38:37 20 Q Uh-huh.  
12:38:35 21 A Boswell, Linda -- Linda Pyles, that I'm  
12:38:40 22 aware of.

0207

12:38:41 1 Q And are there -- been any efforts to  
12:38:43 2 provide some form of compensation to those three  
12:38:45 3 individuals who do not get compensation?  
12:38:48 4 A No.  
12:38:48 5 Q When did Linda become a member of the  
12:38:53 6 board of trustees?  
12:38:54 7 A Gee, somewhere -- I'm not aware of the  
12:39:06 8 date.  
12:39:07 9 Q Well, how recently?  
12:39:11 10 A It wasn't too -- it wasn't too long  
12:39:13 11 after Boswell was.  
12:39:17 12 Q Was there a formal meeting of the board  
12:39:19 13 held and an election held to place Linda on the  
12:39:23 14 board?  
12:39:23 15 A Yes. Yes.  
12:39:24 16 Q And were there minutes taken of these  
12:39:26 17 events?  
12:39:26 18 A Yes, it was.  
12:39:27 19 Q Do you -- have you, as a director, ever  
12:39:29 20 reviewed or approved minutes of any of the  
12:39:32 21 meetings of the board of trustees?  
12:39:34 22 A No.

12:39:34 1 Q What has happened -- who is -- does the  
 12:39:36 2 board have an elected secretary?  
 12:39:37 3 A Yes.  
 12:39:38 4 Q Who is that?  
 12:39:39 5 A Denise Killen.  
 12:39:40 6 Q All right. And has she, to your  
 12:39:42 7 knowledge, ever prepared and distributed any  
 12:39:44 8 minutes or proposed minutes of any meetings of the  
 12:39:46 9 board of trustees?  
 12:39:47 10 A Yes.  
 12:39:47 11 Q And what has happened to those? Where  
 12:39:49 12 are those now?  
 12:39:51 13 A Well, she keeps a record of it in the  
 12:39:54 14 record book.  
 12:39:54 15 Q Have they ever been -- and who has that  
 12:39:56 16 record book now?  
 12:39:58 17 A Denise Killen.  
 12:39:59 18 Q Has a copy of that ever been provided  
 12:40:01 19 to counsel for production in this case?  
 12:40:03 20 A I'm not aware of it.  
 12:40:05 21 Q Have those meeting minutes or proposed  
 12:40:07 22 meeting minutes or draft minutes ever been

12:40:10 1 approved by the board of trustees --  
 12:40:12 2 A Yes.  
 12:40:12 3 Q -- that you're aware of.  
 12:40:14 4 And when were they approved?  
 12:40:15 5 A Pretty much each time we have a board  
 12:40:18 6 meeting we approve them.  
 12:40:21 7 MR. MALONEY: All right. We're closing  
 12:40:22 8 in on 12:40. Counsel, how much time do you want  
 12:40:27 9 to take for lunch?  
 12:40:31 10 MR. MARKS: How much longer do  
 12:40:32 11 you think --  
 12:40:32 12 MR. MALONEY: I've got a ways to go.  
 12:40:36 13 MR. MARKS: It's 12:40. Let's say  
 12:40:38 14 1:30.  
 12:40:40 15 MR. MALONEY: All right. We'll be back  
 12:40:41 16 at 1:30. We'll take a recess.  
 12:40:46 17 THE VIDEOGRAPHER: Going off the  
 12:40:47 18 record. The time is 12:40 p.m.  
 12:40:48 19 (Lunch recess -- 12:40 p.m.)  
 12:40:50 20 (After lunch recess -- 1:39 p.m.)  
 13:39:36 21 THE VIDEOGRAPHER: Back on the record.

13:39:37 22 The time is 1:39 p.m.

0210

13:39:44 1 BY MR. MALONEY:

13:39:45 2 Q Deacon Jackson, you mentioned earlier  
13:39:47 3 that you had received the \$10,000 that was the  
13:39:53 4 bequest to you from the Apostle Betty Peebles  
13:39:58 5 under her will; is that correct?

13:40:01 6 I -- I want to give you an opportunity  
13:40:03 7 to make sure that you're correct about that.

13:40:10 8 MR. MARKS: What was the amount?

13:40:12 9 MR. MALONEY: \$10,000 -- or 15. My  
13:40:14 10 apologies, 15.

13:40:15 11 BY MR. MALONEY:

13:40:16 12 Q And let me rephrase the question so you  
13:40:17 13 understand it.

13:40:17 14 A Yeah, rephrase your question.

13:40:23 15 Q I -- I know you're aware that she's  
13:40:24 16 left you that amount in the will. My question is  
13:40:25 17 a different one. Have you actually gotten the  
13:40:26 18 money?

13:40:26 19 A Have I actually got the money?

13:40:30 20 Q Yes.

13:40:30 21 A Yeah.

13:40:31 22 Q And when did you -- you got the money

0211

13:40:31 1 about a month ago, I think you testified?

13:40:35 2 A I think about a month ago.

13:40:36 3 Q And how is it that you got the money?

13:40:38 4 A By check.

13:40:38 5 Q Uh-huh. Did the lawyer send it to you  
13:40:40 6 or . . .

13:40:41 7 A No, I -- I picked it up at -- at the --  
13:40:44 8 for the trustee --

13:40:45 9 Q Uh-huh.

13:40:46 10 A -- Freeman --

13:40:53 11 Q Uh-huh.

13:40:50 12 A -- D.D. Freeman, so a check written  
13:40:55 13 out.

13:40:55 14 Q Who signed the check; do you know?

13:40:57 15 A I didn't -- I didn't pay attention to  
13:40:58 16 who signed the check.

13:41:00 17 Q And it was made payable to you?

13:41:02 18 A Yeah.

13:41:02 19 Q And this is Michael Freeman?

13:41:04 20 A I -- I didn't -- I'm being honest.  
13:41:06 21 I -- I wasn't aware who signed it.  
13:41:08 22 Q Okay. But you picked it up -- at whose

0212

13:41:11 1 office did you pick it --  
13:41:13 2 A I picked it up at the church office.  
13:41:15 3 Q At the church office.  
13:41:17 4 A Uh-huh.  
13:41:16 5 Q Okay. Who gave it to you at the church  
13:41:19 6 office?  
13:41:19 7 A The secretary.  
13:41:20 8 Q Which secretary?  
13:41:22 9 A Their secretary, Mike Freeman's  
13:41:25 10 secretary.  
13:41:25 11 Q Michael Freeman's secretary?  
13:41:27 12 A Yeah.  
13:41:28 13 Q And did you notice what account this  
13:41:29 14 was drawn on?  
13:41:30 15 A No, I didn't.  
13:41:31 16 Q And did you just put this in your own  
13:41:32 17 account, then?  
13:41:33 18 A Yeah.  
13:41:33 19 Q Which -- which bank? Bank of America?  
13:41:36 20 A Yeah, Bank of America.  
13:41:37 21 Q And do you know if other payments were  
13:41:39 22 made, either from the will or the trust or

0213

13:41:42 1 otherwise?  
13:41:42 2 A No.  
13:41:42 3 Q To other people?  
13:41:43 4 A No, I didn't.  
13:41:44 5 Q Is this something you requested or they  
13:41:46 6 just called you up?  
13:41:47 7 A They called me up.  
13:41:48 8 Q Uh-huh. And who called you up?  
13:41:49 9 A The attorney.  
13:41:49 10 Q Uh-huh. Which attorney; do you know?  
13:41:51 11 A The attorney for the estate.  
13:41:52 12 Q Uh-huh. And said they were making the  
13:41:54 13 distribution --  
13:41:55 14 A Yeah.  
13:41:55 15 Q -- is that correct?  
13:41:56 16 A Uh-huh.  
13:41:56 17 Q Okay. Were you asked to sign anything

13:41:58 18 or just to take the check?  
13:42:00 19 A Yeah, I signed the receipt.  
13:42:01 20 Q The receipt saying that you had  
13:42:02 21 received it?  
13:42:03 22 A Yeah.

0214

13:42:03 1 Q Okay. The -- take a look at tab 38,  
13:42:09 2 your affidavit, if you would. Take a look at  
13:42:27 3 the -- one, two, three pages in.  
13:42:38 4 MR. MARKS: The third page.  
13:42:39 5 THE WITNESS: The third page?  
13:42:41 6 BY MR. MALONEY:  
13:42:41 7 Q And is that your signature right there?  
13:42:43 8 A Yeah.  
13:42:43 9 Q And did you read this affidavit before  
13:42:45 10 you signed it?  
13:42:46 11 A Yes.  
13:42:46 12 Q And what were the circumstances under  
13:42:49 13 which you signed this affidavit?  
13:42:58 14 A That we were filing when the affidavit  
13:43:06 15 was in the complaint about --  
13:43:07 16 THE COURT REPORTER: I'm sorry, I don't  
13:43:07 17 understand you.  
13:43:07 18 THE WITNESS: Under the -- we were  
13:43:07 19 filing a -- a -- a -- a complaint --  
13:43:08 20 BY MR. MALONEY:  
13:43:09 21 Q Uh-huh.  
13:43:09 22 A -- with the court.

0215

13:43:11 1 Q Okay. And did you prepare this  
13:43:20 2 affidavit yourself, or did someone else prepare it  
13:43:21 3 for you?  
13:43:21 4 A Someone else prepared it for me.  
13:43:22 5 Q And who prepared it for you?  
13:43:23 6 A The attorney.  
13:43:24 7 Q All right. Well, and when it says  
13:43:26 8 here, Pastor Betty Peebles, Dorothy Williams,  
13:43:31 9 William Meadows and Ann Wesley, who were the  
13:43:35 10 surviving members of the original board of  
13:43:37 11 trustees, elected the current board of trustees,  
13:43:39 12 except for Clifford Boswell, as successor trustees  
13:43:44 13 pursuant to Resolution 09.  
13:43:47 14 I'm looking at paragraph 3. When you  
13:43:49 15 say they were the surviving members of the board



13:43:51 16 of trustees, what do you -- of the original  
13:43:52 17 board -- board of trustees, what do you know about  
13:43:53 18 that?  
13:43:54 19 A What do I know about?  
13:43:56 20 Q That they were the members of the  
13:43:59 21 original board of trustees?  
13:44:06 22 A That they were -- they were on the

0216

13:44:08 1 board; they were on the -- the old board.  
13:44:12 2 Q And they were members of the board when  
13:44:13 3 this resolution was adopted, or purported to be  
13:44:16 4 adopted in March of 2009?  
13:44:21 5 A Yeah, and then they -- yeah, they  
13:44:24 6 signed it over to us --  
13:44:25 7 Q Uh-huh.  
13:44:25 8 A -- to the new board.  
13:44:26 9 Q When you say they signed it over to  
13:44:28 10 you --  
13:44:30 11 A Oh, William Meadows --  
13:44:34 12 Williams (sic) Meadows and Ann -- Ann -- Ann  
13:44:37 13 Wesley.  
13:44:38 14 Q Do you have any personal knowledge that  
13:44:40 15 they signed it over to you?  
13:44:41 16 A No more than when I saw the -- the  
13:44:44 17 document.  
13:44:45 18 Q All right. So all you're basing that  
13:44:48 19 on is documents that you've seen; is that correct?  
13:44:51 20 A That's correct.  
13:44:51 21 Q All right. And how do you know that  
13:44:54 22 Betty Peebles, Dorothy Williams, William Meadows

0217

13:44:59 1 and Ann Wesley were members of the original board  
13:45:02 2 of trustees?  
13:45:05 3 A From the documents.  
13:45:07 4 Q All right. You don't have any personal  
13:45:09 5 knowledge about that?  
13:45:10 6 A No.  
13:45:10 7 Q Okay. Now, taking a look at page 2  
13:45:20 8 right here, looking at paragraph 7, talking about  
13:45:28 9 a letter from Joel Peebles stating, The undated  
13:45:30 10 letter incorrectly states the following board is  
13:45:33 11 the sole governing body of Jericho Ministries, and  
13:45:38 12 then you say, Of the only -- people listed above,  
13:45:42 13 only Pastor Betty Peebles was on the current board

13:45:45 14 of trustees.  
13:45:46 15 Was that something that someone else  
13:45:47 16 wrote for you?  
13:45:54 17 A Yeah.  
13:45:54 18 Q Now, looking down at the bottom of  
13:45:57 19 page -- paragraph 10, 2008, Pastor Betty Peebles  
13:46:01 20 removed Joel Peebles as headmaster of the school  
13:46:05 21 for mismanagement, which resulted in reduction of  
13:46:08 22 grades from pre-K to 12th to pre-K through five

0218

13:46:14 1 for the school to continue operation.  
13:46:21 2 What do you know about that? Do you  
13:46:21 3 have any personal knowledge about any of that?  
13:46:22 4 A That she said that she removed him from  
13:46:23 5 that because he allowed students come in there  
13:46:26 6 without paying.  
13:46:26 7 Q When did she -- when, if she did, did  
13:46:30 8 she tell you that?  
13:46:33 9 A I think that was sometime in -- when  
13:46:36 10 they had a -- a meeting in December.  
13:46:43 11 Q December of what year?  
13:46:48 12 A I want to say either '08 or early part  
13:46:55 13 of that.  
13:46:57 14 Q And what happened?  
13:46:58 15 A That she had a -- a assembly meeting in  
13:47:00 16 the -- in the church.  
13:47:02 17 Q An assembly meeting?  
13:47:03 18 A Well, she called all the teachers  
13:47:04 19 together.  
13:47:05 20 Q Uh-huh. And the teachers from the  
13:47:06 21 academy?  
13:47:07 22 A Yeah.

0219

13:47:08 1 Q And who else was present besides the  
13:47:10 2 teachers?  
13:47:12 3 A Myself.  
13:47:14 4 Q Uh-huh.  
13:47:15 5 A The apostle and Mark Isaac.  
13:47:22 6 Q And Isaac Marks, you mean?  
13:47:25 7 A Uh-huh.  
13:47:25 8 Q And was anybody with Joel Peebles  
13:47:27 9 there?  
13:47:27 10 A Yeah, he was there.  
13:47:28 11 Q Was this meeting in '08 or '09?

13:47:33 12 A I can't quite re -- I -- I don't recall  
13:47:34 13 what exact date.  
13:47:35 14 Q All right. But Joel was there;  
13:47:36 15 correct?  
13:47:37 16 A Yeah, he was there.  
13:47:37 17 Q All right. And what is it that she  
13:47:38 18 said or did at that meeting?  
13:47:40 19 A Well, she had addressed the -- the  
13:47:42 20 teachers to tell them that -- that it was a big  
13:47:48 21 deficit, and that if they -- that it was a big  
13:47:56 22 deficit in -- in the school budget, and that if it

0220

13:48:03 1 wasn't any improvement, if anything, she was going  
13:48:09 2 to have to close the -- the high school down.  
13:48:11 3 Q Did she blame the deficit on anyone?  
13:48:13 4 A Well, afterwards, she said that -- that  
13:48:16 5 Joel had allowed a lot of students to come into  
13:48:20 6 the school without her permission.  
13:48:22 7 Q When you say "afterwards," is that --  
13:48:24 8 who did she --  
13:48:25 9 A After the meeting.  
13:48:26 10 Q Who did she say that to after the  
13:48:28 11 meeting?  
13:48:28 12 A Well, she was discussing that among --  
13:48:30 13 she was telling me that.  
13:48:32 14 Q She told you that?  
13:48:33 15 A Yeah.  
13:48:34 16 Q And when did she tell you that after  
13:48:36 17 the meeting?  
13:48:36 18 A When I was, you know, taking her out.  
13:48:40 19 Q When you were driving her?  
13:48:41 20 A Yeah.  
13:48:41 21 Q Did you often discuss church business  
13:48:44 22 while you were driving her?

0221

13:48:45 1 A Well, sometime she discuss it.  
13:48:47 2 Q And what did she say Joel did? Did she  
13:48:50 3 say he let people attend the school without paying  
13:48:54 4 tuition?  
13:48:54 5 A That's correct.  
13:48:55 6 Q All right. And did she say that it was  
13:48:56 7 Joel's fault or her fault or anything else? She  
13:48:59 8 blame it on anybody?  
13:49:01 9 A She said it was his fault.

13:49:06 10 Q All right. And what did you say to her  
13:49:07 11 when --  
13:49:07 12 A I didn't say anything.  
13:49:08 13 Q You just sat and listened to that?  
13:49:09 14 A That's all you do.  
13:49:09 15 Q Pardon me?  
13:49:10 16 A That's all you do. You listen to her.  
13:49:12 17 Q Okay. You don't talk back; is that  
13:49:14 18 right?  
13:49:14 19 A Well . . .  
13:49:15 20 Q Why is that?  
13:49:16 21 A I said sometimes you don't.  
13:49:17 22 Q Uh-huh. And at any other time did she

0222

13:49:20 1 express concern in your presence about Joel's  
13:49:22 2 handling of the academy other than that occasion?  
13:49:28 3 A Well, she said it several times.  
13:49:31 4 Q When else besides when you drove her  
13:49:32 5 home that day?  
13:49:34 6 A Oh, well, before she really gotten  
13:49:36 7 sick.  
13:49:36 8 Q She say anything else besides Joel  
13:49:37 9 letting -- about Joel and the academy other than  
13:49:40 10 he let people attend without paying tuition?  
13:49:43 11 A Uh-huh.  
13:49:44 12 Q What -- what else did she say?  
13:49:46 13 A That's it.  
13:49:46 14 Q That's it?  
13:49:46 15 A That I'm aware of.  
13:49:47 16 Q Pardon me?  
13:49:48 17 A That's it that I'm aware of.  
13:49:50 18 Q All right. The -- did she ever discuss  
13:49:57 19 with you a succession plan for the church?  
13:50:02 20 A No.  
13:50:03 21 Q Pardon me?  
13:50:04 22 A No.

0223

13:50:04 1 Q All right. I'm going to ask you now,  
13:50:06 2 if you would, to turn to tab 35, which is the  
13:50:10 3 second amended complaint that you filed here.  
13:50:31 4 Specifically, I'd ask you to turn to paragraph 26.  
13:50:49 5 Paragraph 26 says that, The  
13:50:52 6 aforementioned actions of Defendant Joel Peebles  
13:50:56 7 and Defendant Meadows foment discord, disharmony

13:51:00 8 and confusion throughout the congregation of the  
13:51:03 9 church, for which the church will suffer  
13:51:06 10 irreparable harm if injunctive relief does not  
13:51:10 11 issue.  
13:51:11 12 I'd like you to tell me what actions of  
13:51:13 13 Joel Peebles and Defendant Meadows,  
13:51:14 14 William Meadows, have fomented discord, disharmony  
13:51:20 15 and confusion throughout the congregation.  
13:51:36 16 A Well, what they doing now, they putting  
13:51:39 17 out lies --  
13:51:40 18 Q Uh-huh.  
13:51:40 19 A -- about the -- that we don't want --  
13:51:44 20 that we don't want him to be a pastor of the  
13:51:51 21 church.  
13:51:53 22 Q Well --

0224

13:51:57 1 MR. PEEBLES: Who said that?  
13:51:57 2 BY MR. MALONEY:  
13:51:57 3 Q Yeah, who -- who is saying that?  
13:51:59 4 A Well, people come to us and com --  
13:52:01 5 and -- and -- and it's caused some confusion.  
13:52:04 6 Q Well, who has come to you and said that  
13:52:07 7 either Meadows or Joel Peebles are putting that  
13:52:09 8 out?  
13:52:21 9 A Well, people have said that to me, that  
13:52:23 10 Joel has said that -- that we don't want him --  
13:52:27 11 that we want to put him out of the church.  
13:52:30 12 Q Well, which people have said that?  
13:52:32 13 A Well, people in the congregation.  
13:52:34 14 Q Well, give me some names. Can you name  
13:52:36 15 any -- any single member of the congregation who  
13:52:41 16 has ever said that to you?  
13:52:42 17 A Well, names I'm not too -- to remember.  
13:52:46 18 Q All right. You're telling me today  
13:52:47 19 that there are members of the congregation who  
13:52:49 20 have said that to you, but sitting here today, you  
13:52:51 21 can't remember any of their names; is that  
13:52:53 22 correct?

0225

13:52:53 1 A That's correct.  
13:52:56 2 Q Okay. And -- but these people whose  
13:52:57 3 names you cannot remember said to you that Joel  
13:53:00 4 said you were trying to put him out as pastor; is  
13:53:03 5 that correct?

13:53:05 6 A That -- yes.  
13:53:05 7 Q And you characterize that as a lie; is  
13:53:08 8 that right?  
13:53:09 9 A Pardon me?  
13:53:10 10 Q And you call that a lie; is that right?  
13:53:12 11 A That is a lie.  
13:53:14 12 Q And why is that a lie?  
13:53:15 13 A Because we -- we don't want him to --  
13:53:17 14 we don't want to put him out of the church.  
13:53:19 15 Q And why is it that you don't want to  
13:53:21 16 put him out of the church?  
13:53:23 17 A Well, I mean, we -- you know, we --  
13:53:26 18 we -- we want him to preach; Pastor wanted him to  
13:53:31 19 preach.  
13:53:32 20 Q And why is that? Why do you want him  
13:53:35 21 to preach?  
13:53:35 22 A Well, she feel that that's -- that's --

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13:53:41 1 that's what he -- you know, that's what he should  
13:53:43 2 do.  
13:53:43 3 Q Who feels that?  
13:53:44 4 A Pastor.  
13:53:46 5 Q Who's "Pastor"? You mean the apostle?  
13:53:49 6 A The apostle.  
13:53:50 7 Q Okay. All right. Well, how about you,  
13:53:52 8 though? Do you want him to preach?  
13:53:54 9 A Well, there's some things that he needs  
13:53:56 10 to correct.  
13:53:57 11 Q Well, what would happen if Joel Peebles  
13:54:00 12 were to leave the church and start -- stop  
13:54:02 13 preaching? What would happen to the congregation?  
13:54:05 14 A I'm sure we'd still have some members.  
13:54:08 15 Q Do you have a backup plan for that?  
13:54:10 16 A No.  
13:54:11 17 Q Does Joel Peebles have a following  
13:54:13 18 within the congregation?  
13:54:15 19 A Yeah, he have some people.  
13:54:17 20 Q All right. Is he popular with the  
13:54:22 21 congregation?  
13:54:23 22 A He have some -- some followers, yes.

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13:54:25 1 Q All right. And are there people who  
13:54:27 2 have asked that he be removed as the assistant  
13:54:30 3 pastor or pastor?

13:54:31 4 A There's been people that is  
13:54:34 5 dissatisfied the way he's -- he's -- he's running  
13:54:39 6 the church now.  
13:54:40 7 Q And who are those people?  
13:54:41 8 A They're -- some of the people are  
13:54:43 9 members.  
13:54:43 10 Q All right. What are their names?  
13:54:45 11 A I'd rather not disclose their names.  
13:54:47 12 Q Well, when you say you'd rather not,  
13:54:49 13 I'm asking you today --  
13:54:50 14 A Well.  
13:54:50 15 Q -- about the names. We're here in a  
13:54:53 16 deposition.  
13:54:54 17 A I -- I -- I'd rather not.  
13:54:56 18 MR. MARKS: If you recall any names.  
13:55:01 19 THE WITNESS: Do what, now?  
13:55:02 20 MR. MARKS: If you recall any names.  
13:55:03 21 BY MR. MALONEY:  
13:55:03 22 Q If you recall, you have to tell us. If

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13:55:04 1 you don't recall, you don't.  
13:55:08 2 MR. MARKS: Do you recall?  
13:55:10 3 THE WITNESS: Well, I can recall a  
13:55:18 4 name. I'm thinking Ronald Lee.  
13:55:23 5 BY MR. MALONEY:  
13:55:24 6 Q Anyone else?  
13:55:24 7 A That's all at this time.  
13:55:26 8 Q And what has Ronald Lee told you about  
13:55:29 9 his desire to see Peebles go?  
13:55:33 10 A Well, he -- he just -- just prefer him  
13:55:39 11 not to -- you know, his -- his meaning -- his  
13:55:45 12 demeaning and -- and how he carry hisself on the  
13:55:49 13 pulpit, like I said before. He gets into a  
13:55:51 14 message and then he goes off to something else.  
13:55:55 15 Q And has Lee told you that?  
13:55:56 16 A Yeah.  
13:55:56 17 Q Anyone else besides Lee ever told you  
13:55:58 18 anything to that effect?  
13:55:59 19 A There's been a few other people, but I  
13:56:01 20 can't recall.  
13:56:02 21 Q You can't recall who they are?  
13:56:03 22 A Right.

0229

13:56:04 1 Q All right. And when you say there's

13:56:07 2 dissatisfaction with the way that Peebles is  
13:56:10 3 running the church, I thought that you and the  
13:56:12 4 purported board were running the church?  
13:56:14 5 A Well, the way he was running -- let me  
13:56:17 6 correct. Running -- the way he was preaching the  
13:56:21 7 sermon.  
13:56:22 8 Q Have you and the board -- does the rest  
13:56:24 9 of the board agree with that sentiment, that there  
13:56:26 10 are problems with the way he is preaching the  
13:56:29 11 sermon?  
13:56:30 12 A Repeat your question.  
13:56:31 13 Q Does the rest of your purported board  
13:56:34 14 agree with that sentiment? In other words, that  
13:56:37 15 there's -- that he should make changes in the way  
13:56:39 16 that he is preaching from the pulpit?  
13:56:46 17 A I'm not aware.  
13:56:46 18 Q So you don't know whether your four  
13:56:49 19 purported colleagues agree with you or not --  
13:56:52 20 A Right.  
13:56:52 21 Q -- is that correct?  
13:56:53 22 And has the board discussed or said

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13:57:00 1 anything or done anything to deal with this issue  
13:57:01 2 of whether he needs to change the way he handles  
13:57:04 3 things in the pulpit?  
13:57:08 4 A We have sent him letters in reference  
13:57:10 5 to how he take -- he took the collection.  
13:57:13 6 Q What collection is that?  
13:57:15 7 A On -- on class night, on Wednesday  
13:57:17 8 night.  
13:57:17 9 Q And what did he do with that?  
13:57:22 10 A Takes it and not turn it into the  
13:57:24 11 finance office.  
13:57:24 12 Q All right. Well, why isn't he entitled  
13:57:26 13 to -- if he believes he's still a board member,  
13:57:29 14 why isn't he entitled to keep the collection for  
13:57:32 15 the church under his own terms?  
13:57:34 16 A Because this -- because this is the  
13:57:35 17 original board and it's been, since our pastor put  
13:57:40 18 it in place, that all the money turns in to the  
13:57:41 19 finance office.  
13:57:42 20 Q And how do you know that this is the  
13:57:44 21 original board?  
13:57:44 22 A This board -- this is the board that



13:57:46 1 Pastor put in place.  
13:57:47 2 Q Well, did Pastor have the authority as  
13:57:49 3 the sole trustee, in your judgment, to put this  
13:57:52 4 board into place?  
13:57:53 5 A We were elected to the board.  
13:57:54 6 Q When was that election?  
13:57:56 7 A March the 15th, 2009.  
13:57:58 8 Q Well, when you say there was an  
13:57:59 9 election, did that elect -- was there actually an  
13:58:02 10 election where people cast ballots?  
13:58:04 11 A Well, our names were -- were put on --  
13:58:06 12 we sign our name on the . . .  
13:58:09 13 Q I see. The -- and with respect to this  
13:58:11 14 policy of putting in -- money into the finance  
13:58:15 15 office from the collection, has that ever, to your  
13:58:18 16 knowledge, been formally adopted by any board,  
13:58:20 17 that practice or procedure?  
13:58:22 18 A It's been practice since Pastor in --  
13:58:25 19 put it in -- in place.  
13:58:29 20 Q So it's just what the apostle did; is  
13:58:30 21 that correct?  
13:58:31 22 A Yes.

13:58:31 1 Q It was never formally adopted by a  
13:58:34 2 board of trustees; is that correct?  
13:58:35 3 A It was adopted by the pastor.  
13:58:37 4 Q So there never was a formal vote to  
13:58:40 5 elect you or the other purported board members as  
13:58:42 6 a board -- as a board, was there? Was there ever  
13:58:46 7 an actual vote?  
13:58:49 8 MR. MARKS: Objection. There's no  
13:58:51 9 foundation that this deponent was even on the  
13:58:55 10 prior board.  
13:58:55 11 BY MR. MALONEY:  
13:58:55 12 Q Are you aware of there ever having been  
13:58:57 13 an actual vote to elect you and the other  
13:59:00 14 purported board members to the board of trustees?  
13:59:02 15 A Pastor, on March 15, had said that she  
13:59:04 16 started a new board, and she asked me to put my  
13:59:06 17 name on -- on there as trustee.  
13:59:09 18 Q So you're basing this on what Pastor  
13:59:12 19 told you; is that correct?  
13:59:13 20 A Yes.  
13:59:13 21 Q Okay. Are you aware of any other

13:59:19 22 reason that Joel Peebles should not be the pastor

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13:59:26 1 other than the one comment that you've told me  
13:59:29 2 about with respect to his manner of preaching?  
13:59:34 3 A Well, his -- his demeaning sometime.  
13:59:38 4 Q Demeaning?  
13:59:38 5 A Yeah.  
13:59:39 6 Q How is he demeaning?  
13:59:40 7 A Well, he came into our board meeting  
13:59:43 8 one time and -- and I spoke to him about a -- a  
13:59:53 9 breach of security that his son came into the  
14:00:01 10 school and the alarm went off, the police came,  
14:00:06 11 and that he breached the security by giving his  
14:00:11 12 son the code and the key. And he say he's pastor;  
14:00:15 13 he can do what he want. And he said that he  
14:00:20 14 was -- you know, him and his son was -- was better  
14:00:25 15 than me right before all these board members.  
14:00:29 16 Q He -- he said that they're better than  
14:00:31 17 you?  
14:00:31 18 A Yeah.  
14:00:32 19 Q When did this take place?  
14:00:35 20 A At a board meeting.  
14:00:35 21 Q Uh-huh. How long ago? I mean, what  
14:00:37 22 date?

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14:00:37 1 A Maybe a month, month and a half ago.  
14:00:39 2 Q Recently?  
14:00:41 3 A Two months ago, probably.  
14:00:42 4 Q What -- what board was this?  
14:00:44 5 A This original board.  
14:00:46 6 Q And he showed up at that board meeting?  
14:00:49 7 A Yeah.  
14:00:49 8 Q And who else was present?  
14:00:52 9 A Denise Killen, Dorothy Williams --  
14:00:56 10 Q Uh-huh.  
14:00:56 11 A -- Gloria MaGruder --  
14:00:59 12 Q Uh-huh.  
14:00:58 13 A -- Boswell, Linda Pyles and myself.  
14:01:03 14 Q So this at the church?  
14:01:04 15 A Yeah.  
14:01:04 16 Q And was it in the evening?  
14:01:06 17 A Yeah.  
14:01:06 18 Q And was this a duly called board  
14:01:09 19 meeting --

14:01:10 20 A Yes.  
14:01:10 21 Q -- with notice and everything?  
14:01:12 22 And how is it that Joel happened to be

0235

14:01:16 1 there?  
14:01:16 2 A Well, he's been coming to some of our  
14:01:18 3 meetings.  
14:01:18 4 Q Okay. And he basically said that this  
14:01:20 5 person's better than you? Tell me what you're  
14:01:22 6 talking about.  
14:01:23 7 A I showed him a -- a report that was  
14:01:27 8 written up that his son came into the school.  
14:01:32 9 Q Whose son?  
14:01:33 10 A Joel.  
14:01:33 11 Q Uh-huh. What's his son's name, for the  
14:01:36 12 record?  
14:01:37 13 A Joel.  
14:01:37 14 Q Joel -- Joel, Junior?  
14:01:46 15 A Joel, Junior.  
14:01:49 16 Q Okay.  
14:01:50 17 A And -- and I was telling him that, you  
14:01:50 18 know, you breached the security by giving a  
14:01:53 19 16-year-old, a teenager, a key, master key and a  
14:01:57 20 code.  
14:01:58 21 Q Uh-huh.  
14:01:58 22 A And he say, well, I'm pastor; I can do

0236

14:02:00 1 what I want to do --  
14:02:02 2 Q Uh-huh.  
14:02:02 3 A -- you know.  
14:02:04 4 Q Okay. And was this in the presence of  
14:02:06 5 everyone else?  
14:02:06 6 A Yes.  
14:02:07 7 Q All right. And you had objected to his  
14:02:09 8 son having the master key?  
14:02:11 9 A Yes.  
14:02:12 10 Q And when did -- when did his son  
14:02:14 11 allegedly have the master key?  
14:02:17 12 A Well, I -- I don't -- I don't -- I  
14:02:21 13 don't have that document in front of me with the  
14:02:23 14 date.  
14:02:23 15 Q Uh-huh. And --  
14:02:25 16 A But -- go ahead.  
14:02:26 17 Q Does his son still have the master key?

14:02:28 18 A I'm not aware.  
14:02:29 19 Q Do you know why his son had the master  
14:02:31 20 key, for what purpose?  
14:02:33 21 A To go in -- go into the gym to play  
14:02:34 22 basketball.

0237

14:02:35 1 Q Okay. And did anyone else participate  
14:02:38 2 in this conversation, or was it just you and him?  
14:02:41 3 A Well, they -- he -- he -- he was so  
14:02:46 4 belivid (sic) about it --  
14:02:51 5 Q Uh-huh.  
14:02:51 6 A -- you know?  
14:02:51 7 Q So livid?  
14:02:52 8 A He was so up -- upset about it.  
14:02:55 9 Q Uh-huh.  
14:02:55 10 A And I was trying to tell him that I  
14:02:57 11 wasn't talking about his son. I was talking about  
14:03:03 12 him giving the key and the code, that he breached  
14:03:05 13 the security. And he was telling me that I don't  
14:03:12 14 tell him what to do.  
14:03:13 15 Q Now, who established these security  
14:03:14 16 procedures?  
14:03:15 17 A Who establishes?  
14:03:16 18 Q Yeah.  
14:03:16 19 A I do.  
14:03:17 20 Q Under what authority?  
14:03:18 21 A Under authority of the pastor.  
14:03:20 22 Q And who is the pastor?

0238

14:03:21 1 A A -- a -- well, the apostle.  
14:03:23 2 Q All right. But she's deceased; right?  
14:03:25 3 A She's deceased, but the procedures are  
14:03:28 4 still there.  
14:03:28 5 Q Who's the assistant pastor now?  
14:03:30 6 A He is assistant -- Joel Peebles is  
14:03:34 7 assistant pastor.  
14:03:35 8 Q Have there ever been any situations  
14:03:37 9 where an elder was attacked at the church?  
14:03:40 10 A Pardon me?  
14:03:41 11 Q Ever been a situation where the  
14:03:44 12 elder was -- an elder was attached -- attacked at  
14:03:46 13 the church?  
14:03:47 14 A Yes.  
14:03:47 15 Q When was that?

14:03:50 16 A Sometime last year.  
14:03:51 17 Q Uh-huh. What happened?  
14:03:52 18 A Well, the guy -- one of the members, I  
14:03:54 19 think, called her a name.  
14:03:58 20 Q Called the elder a name?  
14:04:00 21 A Yeah.  
14:04:00 22 Q And which was the elder's name?

0239

14:04:04 1 A Elder Edith.  
14:04:05 2 Q Can you spell the last name?  
14:04:05 3 A Elder Edith.  
14:04:09 4 Q Edith?  
14:04:10 5 A Yeah.  
14:04:11 6 Q Okay. Does she have a last name?  
14:04:13 7 A Joyner, I believe.  
14:04:14 8 Q Okay. And so what happened when the  
14:04:17 9 parishioner called her a name?  
14:04:20 10 A Well, she got upset about it, and the  
14:04:21 11 police was there at the time.  
14:04:22 12 Q Uh-huh.  
14:04:22 13 A And we pulled them into administration  
14:04:25 14 and -- and talked to the both of them.  
14:04:27 15 Q To separate them out?  
14:04:28 16 A Yeah.  
14:04:28 17 Q Okay. Who was the other person?  
14:04:32 18 A I can't think of his name, but he's a  
14:04:34 19 regular member of the church.  
14:04:36 20 Q You usually have police at the  
14:04:37 21 services?  
14:04:38 22 A On Sundays.

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14:04:39 1 Q Uh-huh. Who do you have there?  
14:04:40 2 A For traffic.  
14:04:42 3 Q Who do you have there at the services?  
14:04:44 4 A The county police sometimes, or the  
14:04:46 5 deputy sheriff.  
14:04:47 6 Q Are they paid \$40 an hour as well?  
14:04:49 7 A No, they're 35.  
14:04:50 8 Q That -- that's for traffic management?  
14:04:52 9 A Traffic and security of the church.  
14:04:54 10 Q All right. And who handles those  
14:04:55 11 matters for you?  
14:04:56 12 A Pardon me?  
14:04:57 13 Q Who handles those matters, the

14:04:59 14 recruiting of those officers?  
14:05:01 15 A We have a -- a guy who's in charge of  
14:05:04 16 that detail.  
14:05:04 17 Q What's his name?  
14:05:08 18 A Michael Sims.  
14:05:09 19 Q And was there ever a situation where a  
14:05:11 20 woman who was not an elder was attacked as well?  
14:05:16 21 A Yes, on the parking lot.  
14:05:17 22 Q What happened then?

0241

14:05:18 1 A After eight o'clock -- after  
14:05:20 2 eight o'clock service.  
14:05:21 3 Q And what were the circumstances there?  
14:05:23 4 A Somebody pulled her -- when she was  
14:05:28 5 walking across the street on the parking lot,  
14:05:29 6 pulled her, and I guess attempt to rob her.  
14:05:31 7 Q This was a stranger?  
14:05:33 8 A Might have been somebody, you know,  
14:05:35 9 after church.  
14:05:36 10 Q Was that person ever apprehended?  
14:05:39 11 A No.  
14:05:40 12 Q Did you prepare security reports for  
14:05:47 13 the board under those circumstances?  
14:05:49 14 A We did a security report.  
14:05:50 15 Q All right. Did you ever discuss those  
14:05:51 16 matters with Pastor Peebles?  
14:05:53 17 A No, I didn't.  
14:05:58 18 Q Did you ever report any of those  
14:05:59 19 security issues to the purported board?  
14:06:02 20 A Yes.  
14:06:02 21 Q And what direction, if any, did they  
14:06:04 22 give you?

0242

14:06:05 1 A Well, I reported to them and they --  
14:06:09 2 and I assured them that the police officer  
14:06:14 3 would -- would increase the patrol around the  
14:06:16 4 church.  
14:06:19 5 Q Are you aware -- other than those two  
14:06:21 6 items, which are his manner of preaching that  
14:06:26 7 you've described earlier and the incident that  
14:06:28 8 you've told us involving his son and the security  
14:06:32 9 key and code, are you aware of any other reasons  
14:06:40 10 why Joel Peebles should not be the pastor?  
14:06:49 11 A Well, as I spoke earlier, you know,

14:06:53 12 I -- I feel that he -- he just needs some training  
14:06:55 13 and he's demeaning.  
14:06:58 14 Q All right. So he's demeaning, and the  
14:07:00 15 training you referred to --  
14:07:02 16 A Training and the handling of the money.  
14:07:04 17 Q And what's the problem with the  
14:07:05 18 handling of the money?  
14:07:06 19 A The money was supposed to be turned  
14:07:08 20 into the financial office.  
14:07:09 21 Q You mean the Wednesday --  
14:07:11 22 A Yes.

0243

14:07:11 1 Q -- monies that were collected?  
14:07:14 2 A Well, not only on a Wednesday. When he  
14:07:16 3 had concerts or events, he doesn't turn the money  
14:07:21 4 into the financial office.  
14:07:24 5 Q All right. So the Wednesday events,  
14:07:25 6 the concerts where the money's not turned in, the  
14:07:30 7 son with the security, the manner of preaching.  
14:07:32 8 Is there anything else?  
14:07:33 9 A That's all I can recall right as this  
14:07:35 10 moment.  
14:07:36 11 Q All right. Now, when you state in the  
14:07:38 12 complaint, The defendants breached their duty by  
14:07:40 13 misappropriating and misdirecting monies for  
14:07:43 14 unknown purposes, do you, yourself, have any  
14:07:46 15 knowledge one way or the other what happened to  
14:07:48 16 the proceeds of those Wednesday events and the --  
14:07:50 17 and the -- the other concert events?  
14:07:56 18 A Do I have any what?  
14:07:58 19 Q Do you have any information as to what  
14:07:59 20 happened to those proceeds?  
14:08:01 21 A No, I don't.  
14:08:02 22 Q All right. Have you ever asked -- or

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14:08:03 1 you or the purported board or anyone else, asked  
14:08:09 2 Pastor for any information concerning those  
14:08:10 3 proceeds?  
14:08:11 4 A We sent him a letter and -- and -- and  
14:08:15 5 gave him in -- instruction that the money is  
14:08:17 6 supposed to be turned into the finance office.  
14:08:19 7 Q And when was that?  
14:08:23 8 A Might have been couple weeks ago --  
14:08:27 9 MR. MARKS: Don't guess.

14:08:28 10 THE WITNESS: -- each time that he  
14:08:29 11 doesn't turn it in.  
14:08:31 12 MR. MARKS: Don't guess.  
14:08:31 13 BY MR. MALONEY:  
14:08:31 14 Q Have you and the purported board ever  
14:08:34 15 accounted to anyone for the proceeds which have  
14:08:37 16 been collected from the Sunday collections?  
14:08:40 17 A I don't understand your question.  
14:08:52 18 MR. MALONEY: Let's re -- let's reread  
14:08:55 19 the question, Madam Reporter.  
14:08:58 20 (The Record was read as requested.)  
14:08:58 21 THE WITNESS: Say it again, please.  
14:09:02 22 MR. MALONEY: Can you read that again?

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14:09:03 1 MR. MARKS: You may have to speak up a  
14:09:05 2 little louder, also.  
14:09:06 3 (The Record was read as requested.)  
14:09:23 4 THE WITNESS: No.  
14:09:23 5 BY MR. MALONEY:  
14:09:27 6 Q When in paragraph 45 you make the  
14:09:30 7 statement that, Upon information and belief, the  
14:09:32 8 monies collected during services by Peebles have  
14:09:38 9 been misappropriated and/or redirected, what facts  
14:09:42 10 or information do you have that the funds have  
14:09:43 11 been misappropriated or redirected?  
14:09:46 12 A Because it wasn't turned into the  
14:09:48 13 finance office.  
14:09:49 14 Q But when you use the phrase  
14:09:51 15 "misappropriated" here, can you give any example  
14:09:54 16 of a misappropriation?  
14:09:56 17 A It wasn't turned into the finance  
14:09:57 18 office.  
14:09:58 19 Q But you don't know where the proceeds  
14:09:59 20 were --  
14:10:00 21 A No --  
14:10:01 22 Q -- applied, do you?

0246

14:10:01 1 A -- I don't.  
14:10:02 2 Q Okay. Are you aware of Pastor Peebles  
14:10:06 3 engaging in any misconduct of any kind since  
14:10:10 4 you've known him?  
14:10:13 5 MR. MARKS: Let me object to the --  
14:10:15 6 THE WITNESS: Are you --  
14:10:16 7 MR. MARKS: Let me object and ask



14:10:17 8 counsel to define "misconduct."  
14:10:18 9 BY MR. MALONEY:  
14:10:19 10 Q Conduct that involves moral turpitude;  
14:10:22 11 improper behavior; behavior not befitting of a  
14:10:27 12 pastor; conduct that would be considered generally  
14:10:31 13 or -- objectionable; conduct that would disqualify  
14:10:35 14 him to serve either as a pastor or in a governing  
14:10:40 15 capacity at Jericho.  
14:10:47 16 A Again, his -- his demeaning.  
14:10:53 17 Q Okay. Anything else?  
14:10:54 18 A No.  
14:11:13 19 Q Anything else besides demeaning?  
14:11:16 20 A Well, as I spoke earlier.  
14:11:17 21 Q Okay. Anything of a moral character?  
14:11:21 22 A No.

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14:11:24 1 MR. MALONEY: That's all I have. Thank  
14:11:26 2 you very much.  
14:11:27 3 MR. MARKS: All right. Let me -- let  
14:11:28 4 me pick up on that line of questioning.  
14:11:30 5 EXAMINATION BY COUNSEL FOR THE PLAINTIFF,  
14:11:30 6 COUNTER-DEFENDANT AND THIRD-PARTY DEFENDANTS  
14:11:30 7 BY MR. MARKS:  
14:11:31 8 Q Deacon Jackson, if you don't hear me,  
14:11:33 9 just let me know, and I'll speak louder.  
14:11:38 10 Did you ever have an incident where you  
14:11:39 11 were grabbed by Pastor Peebles?  
14:11:39 12 A Yes.  
14:11:40 13 Q When was that? Tell us about that,  
14:11:43 14 please.  
14:11:43 15 A Two Mondays ago, he was changing the  
14:11:46 16 lock on -- on -- on the pastor's office door, and  
14:11:50 17 I was trying to tell the locksmith that I want the  
14:11:54 18 old lock, and when I reach over to tell him, he  
14:11:58 19 grabbed me.  
14:11:58 20 Q Who grabbed you?  
14:12:00 21 A Joel Peebles.  
14:12:01 22 Q Where did he grab you?

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14:12:02 1 A Right here (indicating).  
14:12:04 2 Q With one hand or two hands?  
14:12:06 3 A No, it was one hand.  
14:12:07 4 Q So he put his hand on you to stop you?  
14:12:09 5 A I put my hand on him, and I told him

14:12:12 6 take my -- take his hand off of me.  
14:12:13 7 Q And what happened after that?  
14:12:14 8 A He took his hand off of me and -- and  
14:12:16 9 Josh, his nephew, came out and told him, don't put  
14:12:22 10 your hand on Deacon Jackson. And he started to  
14:12:26 11 charge his nephew, attempted to -- to fight him.  
14:12:33 12 Q Did he touch his nephew?  
14:12:37 13 A Well, no, we stopped him. We were  
14:12:40 14 grabbing -- they grabbed him, Joel, and we  
14:12:45 15 grabbed --  
14:12:45 16 Q Josh?  
14:12:46 17 A -- Josh.  
14:12:46 18 Q Was there any other occasion where  
14:12:48 19 someone at the church grabbed you or accosted you?  
14:12:51 20 A Yeah. Well, it was about -- about  
14:12:53 21 three or four of them at the same time.  
14:12:59 22 Downstairs, when I first came in that same night,

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14:13:02 1 they grabbed me, and I told them to take their  
14:13:04 2 hands off of me, and I -- I -- and I -- you know,  
14:13:07 3 they grabbed me, and I said, take your hands off  
14:13:09 4 of me. Then when I went upstairs, at the same  
14:13:12 5 time, Joel and three other guys grabbed me.  
14:13:18 6 Q Starting with when you came in  
14:13:19 7 downstairs and you were grabbed, who grabbed you?  
14:13:22 8 A William Jackson and Keith Moore.  
14:13:26 9 Q Do you know why they grabbed you?  
14:13:28 10 A Well, I had told -- when I came in, I  
14:13:31 11 told them that if they had a key and the code,  
14:13:36 12 that they wasn't authorized to have that.  
14:13:39 13 Q Uh-huh.  
14:13:39 14 A And I started to walk upstairs, and  
14:13:40 15 they -- then that's when they grabbed me, and I  
14:13:44 16 told them take their hands off me.  
14:13:47 17 Q And what happened then?  
14:13:50 18 A They took their hands off of me, and I  
14:13:52 19 went on upstairs.  
14:13:53 20 Q And who -- who are they? Do you know?  
14:13:54 21 They have any relationship to Pastor -- to Joel  
14:13:58 22 Peebles?

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14:13:58 1 A They are his armor bearers.  
14:14:01 2 Q What are his armor bearers?  
14:14:03 3 A People that he -- that walks with him,

14:14:05 4 secure -- secure people from, you know, coming  
14:14:11 5 around him or he'll do -- they'll ask him to do  
14:14:14 6 things for him.  
14:14:15 7 Q Joel Peebles will ask him to do things  
14:14:17 8 for him?  
14:14:18 9 A Yeah.  
14:14:18 10 Q So his armor bearers are people who do  
14:14:21 11 his bidding, basically?  
14:14:22 12 A Yes.  
14:14:23 13 Q And then when you went upstairs,  
14:14:25 14 Joel Peebles grabbed you?  
14:14:26 15 A When I went upstairs to where the  
14:14:28 16 locksmith was to tell him that I want the locks --  
14:14:35 17 the old locks, my locks, he -- he put his hand on  
14:14:40 18 me and said, no, don't -- don't go past here --  
14:14:45 19 don't go past this, you know, this door. And then  
14:14:47 20 that's when the other guys grabbed me as well.  
14:14:49 21 And I --  
14:14:49 22 Q Who were those guys who grabbed you?

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14:14:51 1 A There was William Jackson, Keith Moore,  
14:14:55 2 Lionel, and Bruce Crawford.  
14:15:04 3 Q And all four are Joel Peebles' armor  
14:15:07 4 bearers?  
14:15:08 5 A Yeah. Some of them are security and  
14:15:09 6 some of them are armor bearers.  
14:15:14 7 Q In your opinion, is that befitting of a  
14:15:16 8 minister, to grab an individual in the way you  
14:15:19 9 described?  
14:15:21 10 MR. MALONEY: Objection.  
14:15:22 11 Go ahead. You may answer.  
14:15:23 12 BY MR. MARKS:  
14:15:23 13 Q You may answer.  
14:15:24 14 A No.  
14:15:25 15 Q Has Joel Peebles ever grabbed you prior  
14:15:27 16 to that time?  
14:15:28 17 A No.  
14:15:29 18 Q Have you ever had what you would  
14:15:31 19 consider a cross word or an angry word with  
14:15:36 20 Joel Peebles?  
14:15:37 21 A The night that -- yeah, been several  
14:15:40 22 words, yeah, several times.

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14:15:42 1 Q Describe those for us, if you would.

14:15:44 2 A The night I descri -- the night at the  
14:15:45 3 board meeting that he came in and -- and I  
14:15:48 4 explained to him about the breach of security.  
14:15:50 5 Q Uh-huh.  
14:15:50 6 A And he started to yell at me that don't  
14:15:55 7 talk about his family and that he was better --  
14:16:01 8 him -- his son and -- and him was better than me  
14:16:05 9 and he's pastor; he can do what he want to do.  
14:16:08 10 Q And he was yelling at you --  
14:16:10 11 A Yeah.  
14:16:10 12 Q -- when he said that?  
14:16:12 13 A Yeah, yeah.  
14:16:12 14 Q Do -- do you feel that was befitting of  
14:16:15 15 a minister?  
14:16:16 16 A No.  
14:16:18 17 MR. MALONEY: Objection.  
14:16:18 18 THE WITNESS: No.  
14:16:19 19 BY MR. MARKS:  
14:16:21 20 Q Prior to that incident, have you ever  
14:16:22 21 had any other angry discussions or an argument  
14:16:24 22 with Joel Peebles?

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14:16:26 1 A Oh, it's been several ones. There's  
14:16:28 2 been ones that -- in the past that we've talked on  
14:16:33 3 the phone. He accused me -- I don't even want to  
14:16:46 4 say it.  
14:16:47 5 Q Well, tell me about the arguments  
14:16:49 6 you -- you have had with Joel Peebles. You might  
14:16:51 7 want to sit up, also.  
14:16:53 8 A Well, one argument, when the pastor was  
14:16:55 9 in the hospital in Sinai, he -- he told me why I  
14:17:04 10 didn't tell his mother was in the hospital and  
14:17:04 11 that -- and I told him that his mother didn't want  
14:17:09 12 him to know that. And he say, well, I want the  
14:17:12 13 key to the house. And I said, she don't want you  
14:17:16 14 to have a key. And -- and -- and -- and then he  
14:17:18 15 went on to say, well, why? I said, because she  
14:17:22 16 didn't want -- she's my supervisor. She said --  
14:17:24 17 he said, well, not for long.  
14:17:33 18 Q Did you take that as a threat?  
14:17:35 19 A Yes.  
14:17:35 20 Q Is that the first time, or was that the  
14:17:36 21 first time Joel Peebles had ever threatened you?  
14:17:39 22 A No, then threatened me two days after

14:17:41 1 Pastor passed away, and he came to my office and  
 14:17:45 2 said, I'm senior pastor. I want keys to  
 14:17:48 3 everything. And I -- and -- and I want it in --  
 14:17:52 4 in a -- in a hour and a half. And he said, you  
 14:17:54 5 can work with me or you don't have to work with  
 14:17:56 6 me.

14:17:58 7 Q And what would happen if you didn't  
 14:18:00 8 work with him? Did he say?

14:18:03 9 A He didn't say.

14:18:04 10 Q Did you also take that as a threat?

14:18:05 11 A I took it as a threat.

14:18:07 12 Q Is there any other occasion that you  
 14:18:08 13 felt Joel Peebles threatened you?

14:18:15 14 A They -- it was a incident where that he  
 14:18:18 15 was saying that -- that I had said that why I --  
 14:18:26 16 I -- why I said things to his mother about him,  
 14:18:30 17 and I say, I hadn't said anything. And this was  
 14:18:36 18 over a phone conversation. And so I told him I  
 14:18:39 19 didn't said anything like that. And he said, yes,  
 14:18:42 20 you did. I'm coming over at the church. I said,  
 14:18:46 21 well, come on.

14:18:50 22 Q Did he come to the church?

14:18:51 1 A He came to the church and Pastor came  
 14:18:53 2 to the church, and she asked me to go ahead and  
 14:18:57 3 leave because she didn't want any -- any  
 14:18:58 4 conversation between him and I, and I left.

14:19:03 5 Q Any other arguments that you've had  
 14:19:05 6 with Joel Peebles that come to mind?

14:19:11 7 A It hadn't come to my mind, but it's  
 14:19:15 8 been others.

14:19:15 9 Q Have you ever been in service where it  
 14:19:17 10 was announced that Joel Peebles was accused of  
 14:19:21 11 stealing money from the church?

14:19:26 12 A Yeah, it was one recently that  
 14:19:30 13 Bobby Henry said that they accused -- now they  
 14:19:34 14 accusing the pastor of stealing money.

14:19:36 15 Q Who did he say that to?

14:19:41 16 A To --

14:19:41 17 Q Who --

14:19:41 18 A -- the --

14:19:41 19 Q -- did --

14:19:41 20 A -- the --

14:19:41 21 Q -- Bobby --

14:19:41 22 A -- congre- --

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14:19:41 1 Q -- Henry --

14:19:42 2 A -- -gation.

14:19:42 3 Q -- say that to?

14:19:45 4 I'm sorry.

14:19:45 5 A To the congregation.

14:19:46 6 Q From the pulpit?

14:19:48 7 A From the pulpit when we were getting  
14:19:50 8 ready to take the offering.

14:19:55 9 Q Speaking of taking the offering, what  
14:19:57 10 has been the practice, if you know, over the years  
14:20:03 11 how the offering was handled once it was taken up?

14:20:06 12 A Once it was taken up, either a  
14:20:07 13 deacon -- if it my -- if it's not myself or  
14:20:12 14 Boswell, we would take the -- collect the buckets  
14:20:18 15 and follow Dot Williams to the finance office to  
14:20:20 16 be put away.

14:20:22 17 Q And Dot Williams is Dorothy Williams;  
14:20:24 18 correct?

14:20:25 19 A Dorothy Williams. I'm sorry,  
14:20:27 20 Dorothy Williams.

14:20:28 21 Q Okay. And that was after every  
14:20:29 22 service?

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14:20:30 1 A After every service.

14:20:31 2 Q And have you ever seen a written  
14:20:33 3 procedure saying that's how offerings were to be  
14:20:35 4 handled?

14:20:36 5 A No, no more than when he's -- when Joel  
14:20:40 6 didn't turn in any.

14:20:41 7 Q But that's been the practice of the  
14:20:42 8 church?

14:20:43 9 A That's been the practice.

14:20:44 10 Q For how many years, would you say?

14:20:45 11 A As long as I've been at Jericho.

14:20:48 12 Q And have there been occasions where no  
14:20:52 13 offering was taken up at the church during  
14:20:54 14 service?

14:20:55 15 A Well, there have been several occasion  
14:20:57 16 recently that the congregation, at the end of the  
14:21:01 17 service, had to holler, offering, offering, and no  
14:21:05 18 one from the pulpit would -- you know, would say  
14:21:08 19 this is offering time.

14:21:09 20 Q So no one from the pulpit -- who was  
14:21:12 21 preaching that day? Hold on one second.  
14:21:16 22 MR. MARKS: Mr. Maloney, let me ask if

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14:21:19 1 you could advise your clients not to make  
14:21:21 2 comments.  
14:21:22 3 MR. MALONEY: I don't think they're  
14:21:22 4 making comments. Go ahead with your questions.  
14:21:25 5 BY MR. MARKS:  
14:21:26 6 Q How many times has that occurred where  
14:21:27 7 no offering was taken up at the church during  
14:21:31 8 service?  
14:21:32 9 A Well, that's been twice.  
14:21:33 10 Q Who's responsible for making it known  
14:21:36 11 to the congregation that it's time for the  
14:21:38 12 offering to be taken up?  
14:21:40 13 A Usually the minister who -- who's  
14:21:42 14 preaching at the time.  
14:21:43 15 Q And the Sundays that no offering was  
14:21:46 16 taken up, who was preaching?  
14:21:49 17 A Well, Joel was preaching.  
14:21:50 18 Q So he didn't call for an offering from  
14:21:53 19 the congregation?  
14:21:54 20 A Right.  
14:21:54 21 Q And the congregation called it --  
14:21:56 22 A Called it.

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14:21:58 1 Q -- members of the congregation?  
14:22:00 2 A (Witness nods head.)  
14:22:01 3 Q Do you recall any of those members who  
14:22:02 4 called out?  
14:22:03 5 A Well, I can't --  
14:22:04 6 Q If you recall?  
14:22:05 7 A I can't pin out, I mean --  
14:22:07 8 Q Okay.  
14:22:07 9 A -- just people were calling for -- for  
14:22:09 10 offering.  
14:22:09 11 Q And was an offering taken up?  
14:22:11 12 A It was taken up then, yeah.  
14:22:14 13 Q And how was that offering handled?  
14:22:16 14 A It was handled then -- then -- I think  
14:22:18 15 it was Bobby who say, okay, it's offering, you  
14:22:21 16 know.  
14:22:22 17 Q That's Bobby Henry?

14:22:26 18 A Bobby Henry.  
14:22:27 19 Q And the offering was taken up?  
14:22:29 20 A It was taken up.  
14:22:30 21 Q And how was that offering handled?  
14:22:32 22 A And all the congregation walked down to

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14:22:34 1 the front and put the offering in the bucket, and  
14:22:36 2 we made the collection and they took it to  
14:22:39 3 financial office.

14:22:41 4 Q Okay. Are you also involved in the  
14:22:43 5 Wed -- Wednesday collection?

14:22:45 6 A Wednesday collection, yeah. That  
14:22:50 7 offering doesn't come to the church.

14:22:53 8 Q Well, is that how it's always been?

14:22:56 9 A It's always been that any offer -- any  
14:22:59 10 money collected up, whether it was love offer or  
14:23:03 11 whatever, it comes to the finance office.

14:23:06 12 Q And counted?

14:23:06 13 A And counted.

14:23:08 14 Q And how many Wednesdays would you say  
14:23:12 15 monies -- well, let me back up. Strike that.

14:23:15 16 What event on Wednesdays is there at  
14:23:17 17 the church where an offering is taken up?

14:23:22 18 A Joel's class night or if we had a  
14:23:28 19 special prayer service.

14:23:30 20 Q And does Joel Peebles have a class  
14:23:33 21 night every week?

14:23:34 22 A Yeah, every week.

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14:23:36 1 Q And he has an offering taken up?

14:23:38 2 A Yes.

14:23:39 3 Q And that offering has not been turned  
14:23:41 4 over to the church to be counted?

14:23:43 5 A No, it has not.

14:23:44 6 Q For how many weeks is that?

14:23:46 7 A I'm aware of at least three weeks; at  
14:23:49 8 least three weeks.

14:23:54 9 Q And your testimony was you don't know  
14:23:56 10 what happens to that money?

14:23:57 11 A No.

14:23:59 12 Q Was there ever occasion where you saw  
14:24:01 13 members wearing T-shirts or selling -- there was a  
14:24:05 14 selling of T-shirts at the church -- at the church?

14:24:09 15 A Yes.



14:24:09 16 Q What kind of T-shirts were being sold?  
14:24:16 17 A It's in reference to building --  
14:24:20 18 building something in reference to Boys -- Boys  
14:24:23 19 Town.  
14:24:24 20 Q Who sells them?  
14:24:29 21 A Joel's people.  
14:24:31 22 Q When -- when you say "Joel's people"?

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14:24:33 1 A Well, he makes announcement that  
14:24:36 2 he's -- they're selling T-shirts, you know, for --  
14:24:42 3 for funds for Boys Town.  
14:24:44 4 Q He makes that announcement from the  
14:24:47 5 pulpit?  
14:24:48 6 A Yes.  
14:24:48 7 Q This is on days -- on --  
14:24:52 8 A On Sundays.  
14:24:53 9 Q Sundays that he preaches?  
14:24:54 10 A Yep.  
14:24:55 11 Q And do they sell the T-shirts at the  
14:24:58 12 church?  
14:24:59 13 A They sell it -- yeah, they sell it at  
14:25:00 14 the church, out in -- out in the lobby areas.  
14:25:02 15 Q Do you know how much the T-shirts are,  
14:25:04 16 how much they cost?  
14:25:05 17 A I think it's \$10 each.  
14:25:07 18 Q Who collects that money?  
14:25:10 19 A The people who he has out there.  
14:25:13 20 Q Do you know any of the individuals?  
14:25:20 21 A Yeah, but I can't think of her name.  
14:25:27 22 Q But that money is not turned into the

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14:25:30 1 church --  
14:25:31 2 A It's not turned --  
14:25:33 3 Q -- to be counted?  
14:25:34 4 A -- into the Church, no.  
14:25:39 5 Q Is there anything else that's been sold  
14:25:39 6 at the church that was announced by Joel Peebles  
14:25:45 7 from the pulpit?  
14:25:46 8 A That's all I can remember at this time.  
14:25:54 9 Q Let me refer you to tab 35,  
14:26:05 10 paragraph 26, page 6, where you were asked, What  
14:26:29 11 actions of Joel Peebles and Defendant Meadows  
14:26:35 12 foment discord -- discord, disharmony and  
14:26:39 13 confusion throughout the congregation of the

14:26:41 14 church.  
14:26:42 15 When you were grabbed by Joel Peebles'  
14:26:44 16 armor bearers, are they members of the church?  
14:26:47 17 A Yes.  
14:26:47 18 Q Prior to this litigation, are they  
14:26:49 19 individuals you knew?  
14:26:50 20 A Yes.  
14:26:50 21 Q Have you ever had an argument or  
14:26:53 22 anything with those individuals prior to the

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14:26:55 1 litigation?  
14:26:56 2 A No.  
14:27:06 3 Q But after the litigation, they felt  
14:27:08 4 that they could just grab you?  
14:27:10 5 A Yep.  
14:27:10 6 Q And prior to the litigation, you were  
14:27:13 7 aware Joel Peebles would preach the eight o'clock  
14:27:16 8 service?  
14:27:17 9 A Yes.  
14:27:17 10 Q And I think it was your testimony that  
14:27:19 11 you attend that eight o'clock service  
14:27:21 12 periodically?  
14:27:22 13 A Yes. Sometime, yeah.  
14:27:24 14 Q And have you ever attended where a  
14:27:26 15 collection was taken up?  
14:27:28 16 A Yes.  
14:27:30 17 Q And was there ever an occasion where  
14:27:33 18 Joel Peebles did not have that collection turned  
14:27:36 19 into the church?  
14:27:37 20 A It was always turned into the church.  
14:27:42 21 Q Prior to the litigation, were you aware  
14:27:43 22 of the collection taken up at the Wednesday class

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14:27:46 1 that Joel Peebles taught?  
14:27:48 2 A Yes.  
14:27:49 3 Q And were you ever aware prior to the  
14:27:51 4 litigation of any time the money collected was not  
14:27:54 5 turned into the church?  
14:27:55 6 A It was turned into the church.  
14:27:57 7 Q So it's after the litigation the money  
14:27:59 8 is no longer turned into the church?  
14:28:01 9 A That's correct.  
14:28:04 10 Q Would you consider that a disruption of  
14:28:07 11 church operations?

14:28:08 12 A Yes, it is.  
14:28:09 13 Q Does that affect the finances of the  
14:28:12 14 church?  
14:28:12 15 A Yes, it does.  
14:28:20 16 Q Let me refer you to tab 3. You were  
14:28:39 17 previously asked about the board that was in place  
14:28:45 18 when the current board was elected, and you said  
14:28:49 19 you didn't have any knowledge of that board.  
14:28:52 20 I ask you to look at tab 3 and ask  
14:28:55 21 you -- you were -- let me strike that to say you  
14:29:03 22 were not shown -- you were -- I'll get it together

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14:29:06 1 here. Excuse me.  
14:29:07 2 You were referenced to several  
14:29:09 3 documents, and your testimony was you didn't  
14:29:13 4 recall the prior board. I ask you to look at this  
14:29:18 5 tab 3, Statement of Election to Accept of Jericho  
14:29:23 6 Baptist Church. Take a moment and look at those  
14:29:28 7 two pages.  
14:29:47 8 A (Witness reviews document.)  
14:29:49 9 Q Have you seen this document before?  
14:29:51 10 A No, I've never seen this before.  
14:30:01 11 Q I ask you to look at the names -- let  
14:30:05 12 me see -- second page, paragraph 9, The names and  
14:30:13 13 respective addresses, including street number, of  
14:30:16 14 officers and trustees are -- it lists  
14:30:18 15 Pastor Betty P. Peebles, D.D.,  
14:30:23 16 Assistant Pastor James R. Peebles, Junior --  
14:30:27 17 A Uh-huh.  
14:30:26 18 Q -- Elder William A. Meadows,  
14:30:29 19 Minister Lucy Lane, Deacon Ann Wesley and  
14:30:34 20 Deacon Dorothy L. Williams.  
14:30:45 21 Now, let me refer you -- if you would  
14:30:47 22 just hold on to tab 3 and let me refer you to tab

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14:30:50 1 38, which is your affidavit.  
14:30:59 2 A Uh-huh.  
14:31:00 3 Q And look at the fourth page -- fourth  
14:31:14 4 page, which is Resolution 1-09.  
14:31:22 5 This is the resolution that you  
14:31:23 6 referred to that you were elected to the board of  
14:31:25 7 trustees?  
14:31:28 8 A Yes.  
14:31:28 9 Q You've got to move your hand so you --

14:31:29 10 your voice can be recorded.  
14:31:32 11 A Yes.  
14:31:33 12 Q And look at the second page, where it  
14:31:39 13 says at the top, Resolved that the elected  
14:31:42 14 trustees and officers set forth above shall serve  
14:31:45 15 until duty elected successors are elected by this  
14:31:49 16 board of trustees?  
14:31:50 17 A Uh-huh.  
14:31:50 18 Q Do you see that?  
14:31:51 19 A Yes.  
14:31:51 20 Q And you see under Board of Trustees,  
14:31:54 21 you see Betty P. Peebles?  
14:31:57 22 A Yes.

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14:31:57 1 Q Elder William A. Meadows?  
14:32:00 2 A Uh-huh.  
14:32:01 3 Q Deacon Ann Wesley?  
14:32:03 4 A Yes.  
14:32:03 5 Q And Deacon Dorothy L. Williams?  
14:32:06 6 A Yes.  
14:32:07 7 Q And the date of that is March 15, 2009?  
14:32:09 8 A Yes.  
14:32:10 9 Q Now, let me ask you, going back to tab  
14:32:11 10 3, second page --  
14:32:15 11 A Uh-huh.  
14:32:16 12 Q -- on March 15, 2009, was  
14:32:22 13 Assistant Pastor James R. Peebles alive?  
14:32:24 14 A Yes, James R. Peebles, Junior was  
14:32:29 15 alive.  
14:32:30 16 Q In 2009?  
14:32:31 17 A No, in 2000 --  
14:32:32 18 Q No, my question is 2009.  
14:32:34 19 A No.  
14:32:34 20 Q On March 15th, 2009 --  
14:32:36 21 A No.  
14:32:36 22 Q -- he was not alive?

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14:32:37 1 A No.  
14:32:37 2 Q Was Lucy T. Lane alive March 15, 2009?  
14:32:42 3 A No.  
14:32:45 4 Q But March 15, 2009,  
14:32:50 5 Pastor Betty P. Peebles was alive?  
14:32:54 6 A Yes.  
14:32:55 7 Q Elder William A. Meadows was alive?

14:32:58 8 A Yes.  
14:32:59 9 Q Deacon Ann Wesley was alive?  
14:33:07 10 A Yes.  
14:33:07 11 Q And Deacon Dorothy L. Williams was  
14:33:08 12 alive?  
14:33:08 13 A Yes.  
14:33:09 14 Q And they are the individuals whose  
14:33:09 15 signed resolution -- whose signatures are on  
14:33:11 16 Resolution 1.09 --  
14:33:13 17 A Yes.  
14:33:14 18 Q -- correct?  
14:33:14 19 A Yes.  
14:33:15 20 Q You have to let me get my question out  
14:33:16 21 before you answer.  
14:33:17 22 A Okay.

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14:33:22 1 Q How long have you worked with  
14:33:24 2 Dorothy Williams at the church?  
14:33:28 3 A Since 1990.  
14:33:30 4 Q Since 1990?  
14:33:31 5 A Uh-huh. Twenty-one years.  
14:33:33 6 Q And has she worked as treasurer in that  
14:33:38 7 capacity or with the finance -- either treasurer  
14:33:40 8 or in -- or with finances since that time?  
14:33:43 9 A Yes.  
14:33:43 10 Q Do you trust her?  
14:33:44 11 A Yes.  
14:33:45 12 Q Do you believe she knows what she's  
14:33:48 13 doing?  
14:33:48 14 A Yes.  
14:33:49 15 Q Do you have any doubt about her  
14:33:51 16 abilities handling the finances of the church?  
14:33:53 17 A No.  
14:33:55 18 Q Do you handle the finances of the  
14:33:56 19 church?  
14:33:57 20 A No, I don't.  
14:33:58 21 Q Have you ever, in all of the duties  
14:34:00 22 you've done on behalf of the church, handled

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14:34:05 1 finances?  
14:34:06 2 A No.  
14:34:06 3 Q Is it fair to say that you rely on  
14:34:08 4 Dorothy Williams when it comes to finances?  
14:34:11 5 A Yes.

14:34:11 6 Q Now, you were asked if you had taken  
14:34:14 7 any action to ensure that a 990T tax return had  
14:34:18 8 been filed for the church?  
14:34:20 9 A Yes.  
14:34:22 10 Q Do you know if a tax return has to be  
14:34:23 11 filed by the church?  
14:34:26 12 A No.  
14:34:28 13 Q That's not an area that --  
14:34:29 14 A That's --  
14:34:29 15 Q -- you --  
14:34:29 16 A -- not --  
14:34:30 17 Q -- handle?  
14:34:30 18 A -- an area -- right.  
14:34:32 19 Q And who do you rely on for that?  
14:34:34 20 A On Dorothy Williams.  
14:34:38 21 Q So if a tax return had to be filed, you  
14:34:40 22 would rely on Dorothy Williams?

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14:34:42 1 A Yes.  
14:34:43 2 Q Have you been made aware of any filings  
14:34:46 3 on behalf of the church that had not been filed?  
14:34:48 4 A No, I'm not aware.  
14:34:56 5 Q You were also asked about the board  
14:35:00 6 making performance reviews of you as the assistant  
14:35:08 7 chief operating officer and the facilities  
14:35:11 8 manager.  
14:35:12 9 To your knowledge, has the board ever  
14:35:14 10 made performance reviews?  
14:35:16 11 A No.  
14:35:17 12 Q Who did the board rely on to make  
14:35:19 13 performance reviews?  
14:35:20 14 A On -- on each other.  
14:35:22 15 Q And prior to Pastor Peebles' death, who  
14:35:26 16 made performance reviews?  
14:35:27 17 A Pastor.  
14:35:30 18 Q Now, earlier you testified that  
14:35:32 19 Pastor Peebles, also called the apostle, was the  
14:35:39 20 sole trustee?  
14:35:40 21 A Yes.  
14:35:41 22 Q Was she physically the sole trustee?

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14:35:44 1 A Well, no. She was the head, and she  
14:35:47 2 had other people under her, but . . .  
14:35:50 3 Q But she made all the decisions?

14:35:52 4 A She made all the decisions, yes.  
14:35:58 5 Q And do you -- strike that.  
14:35:59 6 Let me show you what was marked as  
14:36:00 7 Deposition Exhibit 4, Jericho City of Play --  
14:36:07 8 Praise Employee Change Record.  
14:36:09 9 A Uh-huh.  
14:36:10 10 Q Were you ever aware of this document  
14:36:13 11 prior to today?  
14:36:13 12 A No.  
14:36:14 13 Q I'm sorry?  
14:36:14 14 A No.  
14:36:17 15 Q And it doesn't have your signature;  
14:36:18 16 right?  
14:36:19 17 A No, it doesn't.  
14:36:20 18 Q It does have the signature of pass --  
14:36:23 19 of the apostle?  
14:36:24 20 A Yes.  
14:36:24 21 Q Did she ever give you a copy of this?  
14:36:27 22 A No.

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14:36:27 1 Q And this says in 2002, your salary was  
14:36:32 2 raised to \$51,500?  
14:36:36 3 A Yes.  
14:36:38 4 Q And thereafter you -- you received  
14:36:42 5 increases in salary?  
14:36:45 6 A Yes. She would give us 3 percent cost  
14:36:49 7 of live -- living.  
14:36:52 8 Q And whenever you got a raise in salary,  
14:36:55 9 did she ever give you or did you ever receive a  
14:36:58 10 form like this employee change record?  
14:37:00 11 A No.  
14:37:10 12 Q How long have you been working with  
14:37:11 13 Denise Killen?  
14:37:12 14 A Twenty-one years.  
14:37:14 15 Q And during that time frame, you've  
14:37:17 16 worked with her on -- on the operation of the  
14:37:19 17 church?  
14:37:20 18 A Yes.  
14:37:20 19 Q Do you trust her ability?  
14:37:21 20 A Yes.  
14:37:22 21 Q Do you have any doubts in her ability?  
14:37:24 22 A No.

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14:37:26 1 Q Do you rely on her for the areas that

14:37:28 2 she handles for the church?  
14:37:29 3 A Yes.  
14:37:30 4 Q What are some of those areas?  
14:37:33 5 A Financial, the operation of the church,  
14:37:40 6 coordination of scheduling.  
14:37:46 7 Q Is it fair to say that each of you have  
14:37:48 8 your areas of responsibility?  
14:37:50 9 A Yes.  
14:37:52 10 Q For example, Denise Killen doesn't  
14:37:55 11 handle facilities maintenance?  
14:37:57 12 A No.  
14:37:58 13 Q She doesn't handle transportation?  
14:38:00 14 A No.  
14:38:00 15 Q Who does she rely on for that?  
14:38:02 16 A Me.  
14:38:02 17 Q So each board member who's also an  
14:38:04 18 officer relies on each other very heavily?  
14:38:07 19 A Yes.  
14:38:11 20 Q So, in that reliance, you trust each  
14:38:14 21 other?  
14:38:14 22 A Yes.

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14:38:18 1 Q You were asked about written  
14:38:21 2 procedures.  
14:38:24 3 Before the death of the apostle, did  
14:38:27 4 you recall any written procedures that the apostle  
14:38:30 5 followed?  
14:38:30 6 A No.  
14:38:34 7 Q Who set forth the procedures?  
14:38:36 8 A The apostle.  
14:38:39 9 Q Is that a practice that this board  
14:38:41 10 plans to continue?  
14:38:42 11 A Well, we can -- right now we -- we're  
14:38:45 12 doing it right now. There might be some changes  
14:38:47 13 that we'll make later.  
14:38:50 14 Q When you say there might be changes  
14:38:52 15 later on, what do you mean?  
14:38:54 16 A Well, I mean new procedures.  
14:38:57 17 Q Are you referring to written  
14:38:59 18 procedures?  
14:38:59 19 A Written procedures.  
14:39:20 20 Q Going back to the questions that you  
14:39:22 21 were asked about the Redskins and parking, for the  
14:39:28 22 2010 season, which would have started in the fall



14:39:34 1 of 2010, what was the approximate parking revenue?  
14:39:39 2 A The total?  
14:39:41 3 Q Yes, approximately.  
14:39:42 4 A 800 -- 800,000.  
14:39:45 5 Q And for the season prior to that, which  
14:39:47 6 would have been the 2009 season, what was the  
14:39:51 7 parking revenue, approximately?  
14:39:53 8 A 400,000, I believe.  
14:39:55 9 Q And so the -- and for the 2008 season,  
14:40:00 10 what was the approximate parking revenue?  
14:40:04 11 A Let's see. That's the permit parking,  
14:40:07 12 and I think that was about a million -- a  
14:40:11 13 million-something.  
14:40:13 14 Q So after the 2008 season, or starting  
14:40:17 15 with the 2009 season, that's when the Redskins  
14:40:20 16 discontinued the permit parking?  
14:40:22 17 A Yes.  
14:40:23 18 Q And -- and -- so the meeting that you  
14:40:27 19 described earlier with Mike Dillow, the pastor,  
14:40:34 20 you, and the attorney for the Redskins and me, as  
14:40:38 21 the attorney for the church, that would -- that  
14:40:41 22 meeting addressed the 2009 season?

14:40:43 1 A Yes.  
14:40:44 2 Q So starting in the 2009 season, that's  
14:40:47 3 when the church started collecting its own parking  
14:40:51 4 fees?  
14:40:52 5 A That's correct.  
14:40:55 6 Q And let me make sure I -- I'm correct.  
14:40:58 7 Was it the 2009 season that the  
14:41:01 8 Redskins started -- or opened their own parking  
14:41:04 9 lot?  
14:41:05 10 A Yeah, the additional lot, yes.  
14:41:08 11 Q And where was that additional lot  
14:41:10 12 located?  
14:41:11 13 A Redskins Road and Brightseat Road.  
14:41:14 14 Q Do you recall if the Redskins made the  
14:41:17 15 church aware -- when I say "the church aware," the  
14:41:21 16 apostle and you and any others attending that  
14:41:24 17 meeting -- that they had planned to open up their  
14:41:27 18 own parking lot?  
14:41:28 19 A Yes.  
14:41:28 20 Q Did that have any bearing on the  
14:41:30 21 Redskins paying the church for permit parking?

14:41:37 22 A Yes. They --

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14:41:38 1 Q How so?

14:41:38 2 A They no longer want to do -- they no  
14:41:41 3 longer want permit parking.

14:41:44 4 Q But -- I'm sorry, you're saying they no  
14:41:47 5 longer -- the Redskins no longer wanted to pay the  
14:41:51 6 church?

14:41:51 7 A Wanted to use -- yeah, pay the church  
14:41:53 8 to use our parking lot.

14:41:57 9 Q And what reason -- did they have any  
14:41:59 10 other reason, aside from opening the Brightseat  
14:42:04 11 Road parking lot?

14:42:05 12 A They was -- they were downsizing.

14:42:07 13 Q What do you mean when you say  
14:42:08 14 "downsizing"?

14:42:10 15 A Well --

14:42:10 16 Q Did they say why they were downsizing?

14:42:12 17 A No, they didn't.

14:42:13 18 Q I'm sorry?

14:42:14 19 A No, they didn't.

14:42:15 20 Q Didn't say why or didn't --

14:42:20 21 A They didn't say why. They said that  
14:42:21 22 they were open up a new lot, and they want to use

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14:42:25 1 their new lot.

14:42:26 2 Q Did they make any offer to the church  
14:42:28 3 to use the church's parking lots even though they  
14:42:31 4 were opening up the Brightseat Road parking lot?

14:42:35 5 A They said they -- if they -- if --  
14:42:36 6 if -- if they wanted to use our lot, you know,  
14:42:42 7 they would, you know, negotiate with Pastor on it.

14:42:44 8 Q But they didn't offer -- or let me  
14:42:47 9 rephrase that.

14:42:49 10 Do you recall if any dollar amount was  
14:42:52 11 offered to the church for the use of the church's  
14:42:55 12 parking lots?

14:42:56 13 A Yes, it was.

14:42:57 14 Q And how much was that?

14:43:01 15 A With 2,200 spaces, they were going to  
14:43:03 16 offer her \$100,000.

14:43:05 17 Q Approximately how many parking spaces  
14:43:08 18 does the church have?

14:43:10 19 A For -- assigned to for parking for

14:43:14 20 Redskins, 3,300 parking spaces.  
14:43:20 21 Q So the Redskins wanted to pay \$100,000  
14:43:23 22 for the use of 22 --

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14:43:24 1 A Twenty-two --  
14:43:25 2 Q -- roughly two-thirds of the parking  
14:43:27 3 spot spaces available?  
14:43:29 4 A Uh-huh.  
14:43:30 5 Q When, for the 2008 season, they had  
14:43:33 6 paid 1.2 million?  
14:43:34 7 A Yes.  
14:43:35 8 Q For how many parking spaces?  
14:43:36 9 A 3,300.  
14:43:37 10 Q So and they wanted to use less parking  
14:43:39 11 spaces and pay even less?  
14:43:40 12 A Yes.  
14:43:48 13 Q You were also asked about the  
14:43:49 14 compensation of the board members, and you  
14:43:51 15 indicated some of the members who you know to  
14:43:53 16 receive compensation from the church.  
14:43:55 17 Are you aware of all the compensation  
14:43:56 18 of board members, or do you know the exact dollar  
14:44:01 19 amount of the compensation --  
14:44:03 20 A No, I don't.  
14:44:04 21 Q -- of board members?  
14:44:06 22 You also were asked if you receive

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14:44:09 1 anything -- any other compensation.  
14:44:12 2 Have you had occasion to be reimbursed  
14:44:15 3 by the church for any expenses that you've paid  
14:44:19 4 out-of-pocket?  
14:44:21 5 A Oh, yeah.  
14:44:23 6 Q And can you describe those?  
14:44:27 7 A Well, when -- when I use the credit  
14:44:29 8 card.  
14:44:30 9 Q I'm sorry?  
14:44:31 10 A When I use my credit card.  
14:44:33 11 Q Is it your credit card or the church's  
14:44:35 12 credit card?  
14:44:36 13 A It's my credit card.  
14:44:37 14 Q And what kind of expenses do you pay  
14:44:40 15 for on behalf of the church, or have you paid for  
14:44:42 16 on behalf of the church?  
14:44:43 17 A Paid -- just it's -- when -- when the

14:44:45 18 bill comes up, take it to the -- to the pastor  
14:44:49 19 and -- and she, you know, pays it.  
14:44:52 20 Q Pays you?  
14:44:53 21 A No, she writes the check out to whoever  
14:44:58 22 the credit card is, like Visa or American Express.

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14:45:02 1 Q And I guess my question is if you can  
14:45:05 2 describe some of the expenditures you've paid for  
14:45:08 3 with your own personal credit card that the church  
14:45:10 4 has reimbursed you for.  
14:45:12 5 A Well, I didn't pay out of my pocket. I  
14:45:15 6 used a credit card.  
14:45:17 7 Q I know. Well, for which you've paid  
14:45:21 8 with your own personal credit card.  
14:45:23 9 A Right.  
14:45:23 10 Q That's what I mean when I say  
14:45:27 11 out-of-pocket.  
14:45:28 12 A Yeah. Well, some of the things would  
14:45:29 13 be -- would be items that -- supplies and all.  
14:45:31 14 Q Supplies for who?  
14:45:33 15 A For the work around there if something  
14:45:35 16 breaks down or something.  
14:45:36 17 Q Can you recall any particular purchase  
14:45:38 18 you made with your credit card?  
14:45:44 19 A Tires for the -- for some of the buses,  
14:45:48 20 rental if we needed a -- a -- anything like a --  
14:45:55 21 a -- a -- a tool or something.  
14:46:01 22 Q And the church would reimburse your

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14:46:03 1 credit card?  
14:46:04 2 A Right.  
14:46:07 3 Q Have you ever seen a written  
14:46:08 4 procedure --  
14:46:08 5 A No.  
14:46:09 6 Q -- stating how reimbursement is to take  
14:46:12 7 place?  
14:46:12 8 A No.  
14:46:13 9 Q So it was the practice of Pastor -- of  
14:46:17 10 the apostle?  
14:46:17 11 A Yes.  
14:46:23 12 Q Is that something that the board  
14:46:27 13 continue -- will continue to do that way, to  
14:46:29 14 handle that way?  
14:46:30 15 A I'm -- I'm not aware, you know, they're

14:46:33 16 going to continue or not.  
14:46:35 17 Q Let -- let me go back to the Redskins  
14:46:36 18 parking, if I can.  
14:46:40 19 You indicated -- how many employees  
14:46:44 20 assist with the collection of the moneys for  
14:46:54 21 parking?  
14:46:55 22 A Five.

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14:46:55 1 Q Do you know these individuals?  
14:46:56 2 A Yes.  
14:46:57 3 Q Do they stand by themselves as they  
14:46:58 4 collect monies, or is it more than one individual  
14:47:01 5 who's there?  
14:47:01 6 A There's a police officer right beside  
14:47:04 7 them.  
14:47:05 8 Q With each individual?  
14:47:06 9 A Each individual, yeah.  
14:47:07 10 Q Have you ever had any occasion where  
14:47:09 11 in -- in -- one of the individuals or anyone ever  
14:47:11 12 stole any of the parking revenue?  
14:47:14 13 A No, no.  
14:47:15 14 Q Have you ever had any incidents where  
14:47:17 15 any of the monies were missing?  
14:47:19 16 A No.  
14:47:20 17 Q Any incident that called into question  
14:47:24 18 the security of any money?  
14:47:25 19 A No.  
14:47:27 20 Q Anyone ever been accused of stealing  
14:47:29 21 money?  
14:47:30 22 A No.

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14:47:30 1 Q All money from the parking revenue has  
14:47:33 2 been accounted for?  
14:47:34 3 A Yes.  
14:48:05 4 Q Now, earlier you were asked about  
14:48:06 5 things you were dissatisfied with the preaching of  
14:48:08 6 Joel Peebles. Do you recall that?  
14:48:11 7 A Yes.  
14:48:11 8 Q And is it fair to say that you're  
14:48:17 9 dissatisfied with his preaching or with the way he  
14:48:20 10 conducts himself as a minister?  
14:48:23 11 A It -- it would be more of the way he  
14:48:29 12 conduct hisself as a minister.  
14:48:30 13 Q And that's what you described earlier

14:48:30 14 about --  
14:48:31 15 A Yes.  
14:48:31 16 Q -- the times he's grabbed you, the  
14:48:32 17 angry words he's had, giving his son a key to  
14:48:35 18 the -- the gym?  
14:48:36 19 A Yes.  
14:48:37 20 Q And, by the way, on that incident where  
14:48:40 21 Joel Peebles gave his son a key to the gym, did  
14:48:43 22 Joel Peebles acknowledge he gave his -- his son a

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14:48:45 1 key?  
14:48:46 2 A Yes.  
14:48:46 3 Q Was that -- did Joel Peebles give his  
14:48:49 4 son his own key?  
14:48:53 5 A Yes.  
14:48:53 6 Q And how was it that it was discovered  
14:48:55 7 that the son was in the gym?  
14:48:58 8 A Well, when the alarm went off and the  
14:49:02 9 police came, and one of the security individual,  
14:49:03 10 Mensa (phonetics), saw the police over there. He  
14:49:10 11 walked over there, and he went in with the police,  
14:49:15 12 and that's when he discovered that the boys were  
14:49:18 13 in the gym. And he asked Joel, Junior, how did he  
14:49:25 14 get in there; he said his father dropped him off  
14:49:28 15 and gave him the key and the code.  
14:49:30 16 Q Who was he in the gym with?  
14:49:33 17 A Two other boys.  
14:49:34 18 Q Were they playing basketball or  
14:49:36 19 something?  
14:49:37 20 A Yeah.  
14:49:37 21 Q And it was your testimony that  
14:49:39 22 Joel Peebles, Senior, the father, not the son,

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14:49:43 1 objected when you brought that up to him?  
14:49:45 2 A Yes, right in front of these board  
14:49:49 3 members (indicating).  
14:50:24 4 Q Let me refer you to tab 32 -- I'm  
14:50:43 5 sorry, tab 33. That's the letter to you from  
14:50:48 6 Joel Peebles that's undated?  
14:50:52 7 A Yes.  
14:51:05 8 Q Prior to your receipt of this letter,  
14:51:07 9 had you ever had any discussions with Joel Peebles  
14:51:12 10 about the operation of the church?  
14:51:15 11 A No.

14:51:16 12 Q About facilities management?  
14:51:18 13 A No.  
14:51:19 14 Q About the security of the church?  
14:51:21 15 A No.  
14:51:25 16 Q Have you ever known Joel Peebles to be  
14:51:27 17 involved in the operation of the church from your  
14:51:29 18 observation?  
14:51:30 19 A No.  
14:51:31 20 Q But he was involved with the school?  
14:51:33 21 A Yes, he was.  
14:51:39 22 Q What was your reaction when you

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14:51:41 1 received this letter from Joel Peebles that he was  
14:51:47 2 acknowledging who the board members of the church  
14:51:49 3 were? Did you take the letter serious -- or  
14:52:04 4 strike that.  
14:52:08 5 Did you believe the letter? Did you  
14:52:09 6 believe the content of what it said?  
14:52:12 7 A Not really, because -- not really,  
14:52:16 8 because we're the board.  
14:52:30 9 Q Were you ever aware --  
14:52:32 10 THE COURT REPORTER: I'm sorry.  
14:52:32 11 Because we were what?  
14:52:34 12 THE WITNESS: We are the board.  
14:52:34 13 BY MR. MARKS:  
14:52:34 14 Q Were you ever aware of a particular  
14:52:35 15 time where the apostle was ill and there was a  
14:52:39 16 question of whether Joel Peebles was attempting to  
14:52:42 17 take over the church?  
14:52:45 18 A Yes, just before she -- before she  
14:52:52 19 passed.  
14:52:57 20 Q Well, prior to that incident, prior to  
14:52:58 21 the time she passed, was there ever --  
14:52:59 22 A There was a time in 2003.

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14:53:01 1 Q What happened then?  
14:53:03 2 A That -- that Bobby Henry and Joel were  
14:53:09 3 trying to take over the church.  
14:53:10 4 Q What do you mean they were trying to  
14:53:12 5 take over the church?  
14:53:13 6 A Well, the leadership of the church.  
14:53:15 7 Q What -- what happened where they were  
14:53:16 8 trying to take over the leadership of the church?  
14:53:19 9 A Well, I think that at that time Joel

14:53:23 10 was -- was -- had -- was -- had a -- you know,  
14:53:35 11 would sign checks, and he -- well, strike that.  
14:53:43 12 Q Well, let me ask you. You -- how did  
14:53:46 13 it come about that Joel -- it -- it was alleged  
14:53:49 14 that Joel Peebles had tried to take over control  
14:53:51 15 of the church? Where was the apostle?  
14:53:57 16 A The apostle was in the -- was sick in  
14:54:00 17 the hospital, and him and --  
14:54:06 18 Q Who is he?  
14:54:08 19 A Bobby Henry and -- and Joel said that  
14:54:12 20 they were in charge.  
14:54:14 21 Q This was in 2003?  
14:54:16 22 A Yeah.

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14:54:18 1 Q Were you reminded of that when you  
14:54:22 2 received this letter that is tab 33?  
14:54:24 3 A Yeah, I was reminded of that, and also  
14:54:26 4 the pastor had all of them, the chairman, Joel and  
14:54:32 5 Bobby all come to her house when she beginning to  
14:54:39 6 be get well to tell them that she was still in  
14:54:41 7 charge.  
14:54:42 8 Q This was 2003 or 2010?  
14:54:44 9 A 2003. And she would even call to the  
14:54:51 10 congregation and tell them that she's still in  
14:54:53 11 charge.  
14:54:58 12 Q Prior to the apostle's death in  
14:55:00 13 October 2010, was there ever a time where she was  
14:55:04 14 not on medications that she didn't seem to you to  
14:55:10 15 understand what was going on?  
14:55:12 16 A Oh, she understood.  
14:55:13 17 Q Why do you say that?  
14:55:14 18 A Because she would ask me what was going  
14:55:16 19 on in church, and she would sign documents. I  
14:55:22 20 had -- it had been occasion that I've got  
14:55:26 21 documents from -- from Denise and then took it  
14:55:29 22 over to her house, and it has been time that there

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14:55:35 1 was meeting with the Bozzuto, the construction  
14:55:44 2 company, and she would call in and participate  
14:55:46 3 into -- into that.  
14:55:47 4 Q And what was Bozzuto constructing?  
14:55:50 5 A Pardon me?  
14:55:52 6 Q What was Bozzuto doing?  
14:55:53 7 A They had -- they -- they were having a



14:55:54 8 meeting, a regular weekly meeting.  
14:55:58 9 Q Uh-huh.  
14:55:59 10 A And she would participate in that.  
14:56:00 11 Q Okay.  
14:56:04 12 MR. MARKS: Tim, can we take a  
14:56:05 13 five-minute break?  
14:56:07 14 MR. MALONEY: Sure.  
14:56:08 15 THE VIDEOGRAPHER: Going off the  
14:56:08 16 record. The time is 2:55 p.m.  
14:56:13 17 (Recess -- 2:55 p.m.)  
14:56:13 18 (After recess -- 3:14 p.m.)  
15:15:14 19 THE VIDEOGRAPHER: Back on the record.  
15:15:15 20 The time is 3:14 p.m.  
15:15:19 21 BY MR. MARKS:  
15:15:19 22 Q All right. Deacon Jackson, you had

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15:15:21 1 mentioned earlier that Joel Peebles has a Ford  
15:15:27 2 Explorer that he initially bought, and that  
15:15:32 3 purchase angered the apostle and she made him pay  
15:15:36 4 for the car?  
15:15:36 5 A Yes.  
15:15:37 6 Q And that car is now parked at the  
15:15:38 7 church?  
15:15:39 8 A Yes.  
15:15:40 9 Q Are you -- how are you aware that that  
15:15:48 10 Ford Explorer belongs to Joel Peebles?  
15:15:56 11 A Well, the pastor told me that -- that  
15:15:58 12 Bobby Henry and Joel went to Lanham Ford to  
15:16:01 13 purchase the -- the Ford, and that the payment  
15:16:04 14 book came to the church, and Dot Williams brought  
15:16:09 15 it into her office, and that's how she discovered  
15:16:12 16 that it belonged to Joel.  
15:16:15 17 Q Who uses the truck now?  
15:16:17 18 A No one.  
15:16:20 19 Q It's just parked at the church?  
15:16:23 20 A Yes.  
15:16:23 21 Q Does it have tags on it?  
15:16:25 22 A Yes. The tags are dead since '08.

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15:16:29 1 Q I'm sorry. You said the tags are  
15:16:30 2 expired?  
15:16:31 3 A Yeah.  
15:16:32 4 Q Since 2008?  
15:16:33 5 A Yeah.

15:16:36 6 Q Do you -- do you recall the last time  
15:16:38 7 the truck has been driven by anyone?  
15:16:40 8 A No. Been awhile.  
15:16:46 9 Q Do you know who parked it at the  
15:16:49 10 church?  
15:16:50 11 A I assume Joel did.  
15:16:56 12 Q Earlier in your testimony you referred  
15:16:58 13 to the current board as the original board. But  
15:17:02 14 there's been more than one board; right?  
15:17:06 15 A Yes.  
15:17:07 16 Q What did you mean when you said -- when  
15:17:09 17 you referred to the current board as the original  
15:17:11 18 board?  
15:17:12 19 A Yeah, I -- I was saying that our board  
15:17:16 20 was the original board. I was referring to that  
15:17:20 21 our board is the -- is the government board now.  
15:17:24 22 Q So when you said the -- our board is

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15:17:28 1 the original board, you meant the current board?  
15:17:31 2 A The current board.  
15:17:32 3 Q All right. I just wanted to be clear  
15:17:33 4 to which board you were referring to. And when  
15:17:36 5 you say "our board," you're referring to yourself,  
15:17:40 6 Denise Killen --  
15:17:42 7 A Yes.  
15:17:42 8 Q -- Gloria MaGruder --  
15:17:47 9 A Yes.  
15:17:47 10 Q -- Clifford Boswell --  
15:17:49 11 A Yes.  
15:17:50 12 Q -- and Linda Pyles --  
15:17:53 13 A Yes.  
15:17:53 14 Q -- and Dorothy Williams?  
15:17:55 15 A Yes.  
15:18:11 16 Q Let me refer you to tab 9. That's the  
15:18:14 17 2000 D.C. two-year report for nonprofit foreign  
15:18:26 18 and domestic operations.  
15:18:28 19 And I want to be clear. Your name is  
15:18:31 20 listed as a director; right?  
15:18:33 21 A Yes.  
15:18:33 22 Q And how did you say your name came to

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15:18:39 1 be listed as a director?  
15:18:40 2 A Pastor had said that she needs another  
15:18:41 3 name there and for me to put my name there.

15:18:42 4 Q But you didn't take that to mean that  
15:18:42 5 she was selecting you as a trustee?  
15:18:43 6 A No.  
15:18:44 7 Q It was just fit -- including your name  
15:18:46 8 for the purpose of filing this report?  
15:18:50 9 A Yes.  
15:18:50 10 Q And let me refer you to tab 11, which  
15:18:58 11 is the 2002 two-year report -- District of  
15:19:01 12 Columbia two-year report for nonprofit foreign and  
15:19:05 13 domestic corporations.  
15:19:11 14 Your name is again listed as a  
15:19:13 15 director.  
15:19:14 16 A Yes.  
15:19:14 17 Q And that is signed by Joel Peebles?  
15:19:16 18 A Yes.  
15:19:17 19 Q Did Joel Peebles ask you to include  
15:19:20 20 your name on that list?  
15:19:21 21 A No, he didn't.  
15:19:21 22 Q Who asked you to include your name on

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15:19:23 1 that list?  
15:19:23 2 A Pastor.  
15:19:24 3 Q So it was your understanding that  
15:19:25 4 Pastor would just let people to include their name  
15:19:28 5 on whatever document --  
15:19:29 6 A Uh-huh.  
15:19:29 7 Q -- she needed it to be on?  
15:19:31 8 A Yes, that's how she does.  
15:20:01 9 Q Now, you were also asked earlier about  
15:20:03 10 your discussions with Pastor as you would drive  
15:20:07 11 her. Those discussions would include the  
15:20:10 12 operation of the church?  
15:20:12 13 A Yes.  
15:20:13 14 Q And this was prior to March 15 when  
15:20:16 15 Pastor selected you to the board; correct?  
15:20:19 16 A Right.  
15:20:20 17 Q How many years prior to your selection  
15:20:23 18 to the board as a trustee on March 15, 2009 -- how  
15:20:27 19 many years prior to that time would you say you  
15:20:31 20 and Pastor discussed church business?  
15:20:38 21 A Quite often.  
15:20:39 22 Q I'm sorry. You said, "quite often"?

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15:20:40 1 A Uh-huh.

15:20:41 2 Q Any approximation of the number of  
15:20:42 3 years prior to March 15, 2009?  
15:20:48 4 A Regularly, you know. You know, for the  
15:20:50 5 operation of the church. She -- she always would  
15:20:53 6 call me, what's going on, you know; did you get  
15:20:56 7 this done; did you get that done.  
15:21:00 8 Q What's your earliest recollection as to  
15:21:03 9 the year that you would start discussing church  
15:21:06 10 business with Pastor Peebles?  
15:21:17 11 A My earliest recollection, I guess, was  
15:21:24 12 after the -- when I was on the board.  
15:21:37 13 Q In your years serving as facility  
15:21:40 14 manager, do you ever recall a time that  
15:21:43 15 Joel Peebles took any action regarding the  
15:21:47 16 maintenance or operation of one of the church  
15:21:50 17 facilities?  
15:21:52 18 A The school.  
15:21:53 19 Q Just the school?  
15:21:54 20 A Uh-huh.  
15:21:55 21 Q And what about the church itself?  
15:21:57 22 A No.

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15:21:59 1 Q You ever recall any other time where he  
15:22:01 2 changed the locks on any door or building?  
15:22:07 3 A Recently, yes.  
15:22:08 4 Q Prior to the incident that you  
15:22:09 5 described earlier --  
15:22:10 6 A No.  
15:22:10 7 Q -- regarding -- let me finish my  
15:22:12 8 question -- regarding the apostle's office?  
15:22:16 9 A No.  
15:22:46 10 MR. MARKS: That's all I have.  
15:22:46 11 EXAMINATION BY COUNSEL FOR THE DEFENDANTS,  
15:22:46 12 COUNTER-PLAINTIFFS AND THIRD-PARTY PLAINTIFFS  
13 BY MR. MALONEY:  
15:22:47 14 Q Okay. That credit card that you  
15:22:49 15 referenced earlier for which you receive  
15:22:51 16 reimbursement, who is the issuer of that credit  
15:22:55 17 card?  
15:22:56 18 A I'm the issuer.  
15:22:56 19 THE COURT REPORTER: I'm sorry?  
15:22:56 20 THE WITNESS: I am.  
15:22:56 21 BY MR. MALONEY:  
15:22:56 22 Q No, the issuer. In other words, which

15:22:59 1 bank?  
 15:22:59 2 A Oh, American Express.  
 15:23:01 3 Q And are you the sole credit card  
 15:23:04 4 holder --  
 15:23:05 5 A Yes.  
 15:23:05 6 Q -- on that?  
 15:23:06 7 And that has to be paid off in full  
 15:23:08 8 each month; correct?  
 15:23:10 9 A That's correct.  
 15:23:10 10 Q And about how much a month do you put  
 15:23:12 11 on that credit card that is subject to  
 15:23:14 12 reimbursement?  
 15:23:16 13 A Sometimes maybe 3- or 4,000 -- thousand  
 15:23:18 14 dollars.  
 15:23:19 15 Q Is there -- are there any church credit  
 15:23:21 16 cards, or is that the only credit card that's used  
 15:23:25 17 for church expenses?  
 15:23:26 18 A No, that's not the -- the church  
 15:23:29 19 doesn't have a credit card.  
 15:23:30 20 Q That's what I'm asking you.  
 15:23:31 21 A All right.  
 15:23:32 22 Q Okay. But --

15:23:33 1 A The pastor used her credit card as well  
 15:23:36 2 for church business.  
 15:23:37 3 Q And she'd get reimbursed?  
 15:23:40 4 A She'd get reimbursed.  
 15:23:42 5 Q Now, when the reimbursements come, do  
 15:23:44 6 they go to you or do they go to American Express?  
 15:23:46 7 A American Express.  
 15:23:47 8 Q Okay. And do you have forms you use to  
 15:23:48 9 itemize those accounts?  
 15:23:50 10 A Yes. When there's a bill and I would  
 15:23:53 11 take -- I would take the bill to her --  
 15:23:55 12 Q Uh-huh.  
 15:23:55 13 A -- and she would look at it and sign it  
 15:23:58 14 and then turn it into the financial office.  
 15:24:00 15 Q And who is "she"?  
 15:24:02 16 A Apostle.  
 15:24:03 17 Q All right. Now that the apostle's  
 15:24:05 18 deceased, what's the procedure?  
 15:24:08 19 A It's the same procedure, but Denise  
 15:24:10 20 does that.  
 15:24:10 21 Q And Denise approves and signs off on

15:24:13 22 it, then?

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15:24:13 1 A Yes.

15:24:14 2 Q Okay. And are any of these personal  
15:24:16 3 expenses for you?

15:24:17 4 A None.

15:24:18 5 Q Well, do you get any mileage  
15:24:20 6 reimbursement or gasoline reimbursement?

15:24:23 7 A No.

15:24:23 8 Q And how about a church vehicle besides  
15:24:25 9 the Mercedes we talked about before; do you get  
15:24:28 10 that? Do you get any kind of church vehicle --

15:24:31 11 A Oh, no. No.

15:24:32 12 Q -- or anything like that?

15:24:34 13 Okay. Does anyone have a church  
15:24:35 14 vehicle?

15:24:35 15 A No.

15:24:36 16 Q All right. Now, with respect to  
15:24:38 17 stealing money, are you aware of anyone at any  
15:24:42 18 time stealing money, embezzling money from  
15:24:48 19 Jericho?

15:24:49 20 A No, I'm not aware.

15:24:54 21 Q Okay. And that would include  
15:24:54 22 Joel Peebles, or anyone else, for that matter;

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15:24:57 1 you're not aware of that, any misappropriation,  
15:24:59 2 embezzlement or anything like that?

15:25:02 3 A Only -- only the -- the -- the  
15:25:02 4 Wednesday collection.

15:25:04 5 Q That we talked about earlier?

15:25:06 6 A Yeah.

15:25:06 7 Q Okay. Did Joel Peebles ever have  
15:25:09 8 authority to sign checks that you're aware of?

15:25:12 9 A Yeah, pastor's personal account.

15:25:13 10 Q Okay. Besides that, anything else?

15:25:15 11 A No.

15:25:16 12 Q All right. Now, when you made the  
15:25:18 13 statement earlier in response to a question from  
15:25:21 14 Mr. Marks that the pastor would just put names on  
15:25:24 15 of people and decide who was on the board for  
15:25:30 16 purposes of these forms; is that your --

15:25:35 17 MR. MARKS: Objection; that's  
15:25:36 18 mischaracterization of the question.

15:25:37 19 BY MR. MALONEY:

15:25:37 20 Q Well, I want your -- I want your  
15:25:38 21 recollection.  
15:25:38 22 What is it that Pastor did as far as

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15:25:41 1 who would be listed on the var -- on the boards of  
15:25:44 2 Jericho over the years? Was it something that  
15:25:45 3 open elections were held in a board, or something  
15:25:48 4 she decided, or what?

15:25:49 5 A Well, it, with me, was that she was  
15:25:51 6 missing a name and she say, put your name on here,  
15:25:53 7 I need another person.

15:25:55 8 Q Uh-huh.

15:25:56 9 A And I signed my name there.

15:25:58 10 Q And she would just do that --

15:26:00 11 A Yes.

15:26:00 12 Q -- is that right?

15:26:01 13 A Yes.

15:26:02 14 Q Are you aware of there ever having been  
15:26:04 15 an election for the board of directors prior to  
15:26:07 16 what you claim occurred in March of 2009 -- ever,  
15:26:12 17 at any time?

15:26:26 18 A Well, it might have been the original  
15:26:27 19 board.

15:26:28 20 MR. MARKS: Don't guess.

15:26:29 21 THE WITNESS: Okay. I'm not aware.

15:26:32 22 BY MR. MALONEY:

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15:26:32 1 Q Okay. Now, the arguments with  
15:26:34 2 Pastor Peebles, you said one of them was about the  
15:26:39 3 son. What -- one of them was about the locks and  
15:26:44 4 the keys.

15:26:45 5 Was there a time when he -- you had an  
15:26:48 6 argument with him about your role or relationship  
15:26:50 7 with women in the congregation?

15:26:52 8 A Not no argument, no.

15:26:53 9 Q A discussion?

15:26:57 10 A No.

15:26:58 11 Q Has he ever -- have you and he ever  
15:27:00 12 discussed in any way your role or relationship  
15:27:05 13 with any of the women in the congregation?

15:27:15 14 MR. MARKS: Let me ask you, Counsel,  
15:27:17 15 are you referring to a professional relationship,  
15:27:19 16 business relationship or social relationship?

15:27:22 17 MR. MALONEY: Social.

15:27:23 18 THE WITNESS: Yeah, it was one.  
15:27:24 19 BY MR. MALONEY:  
15:27:24 20 Q All right. Tell me about that.  
15:27:26 21 A Yeah. It was one that -- that -- that  
15:27:33 22 I was -- was engaged to.

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15:27:40 1 Q And he expressed concern to you about  
15:27:42 2 it?  
15:27:42 3 A Yeah.  
15:27:42 4 Q And when did he do that?  
15:27:47 5 A Well, he -- he was saying that, you  
15:27:48 6 know, I need to come to him to, you know, discuss  
15:27:50 7 the engagement.  
15:27:50 8 Q Uh-huh. And who was that you were  
15:27:52 9 engaged to?  
15:27:53 10 A Taolita Davis.  
15:27:56 11 Q Was that an engagement that resulted in  
15:27:58 12 marriage?  
15:27:58 13 A No.  
15:27:58 14 Q All right. And did you do that?  
15:28:00 15 A No.  
15:28:01 16 Q All right. Did he ever -- other than  
15:28:03 17 that engagement -- or strike that.  
15:28:05 18 Did he express concern about your  
15:28:07 19 relationship with her?  
15:28:08 20 A No.  
15:28:09 21 Q Other than that conversation, did he  
15:28:11 22 ever -- or did you and he ever have any

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15:28:14 1 conversation about you and women in the  
15:28:17 2 congregation in any way?  
15:28:18 3 A He had the discussion with his mother.  
15:28:20 4 Q Tell me about that.  
15:28:22 5 A Well, he accused -- accused me of -- of  
15:28:25 6 going with the women in the church.  
15:28:27 7 Q He accused you of going with women in  
15:28:30 8 the church?  
15:28:31 9 A Yeah.  
15:28:31 10 Q And what specifically did he accuse you  
15:28:34 11 of with his mother?  
15:28:36 12 A Just -- just that.  
15:28:37 13 Q That?  
15:28:37 14 A Going -- going to -- going with a lot  
15:28:40 15 of women in the church.



15:28:41 16 Q In other words, going out with too many  
15:28:42 17 women in the church; is that right?  
15:28:44 18 A Yeah.  
15:28:45 19 Q How do you know he did that?  
15:28:46 20 A Because he -- how I know he did that?  
15:28:48 21 Q Yeah.  
15:28:49 22 A He -- he -- he lied about it.

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15:28:51 1 Q He lied about what?  
15:28:52 2 A About that.  
15:28:54 3 Q To -- to his mother?  
15:28:54 4 A To his mother.  
15:28:55 5 Q Okay. How'd you find out about all  
15:28:58 6 this?  
15:28:58 7 A His mother would tell me.  
15:28:59 8 Q So his mother would say, Joel came to  
15:29:03 9 me to say you've been going out with too many  
15:29:05 10 women in the congregation?  
15:29:07 11 A Yes.  
15:29:07 12 Q Okay. And how many times did Joel go  
15:29:08 13 to his mother about that, if you know?  
15:29:10 14 A A few times.  
15:29:11 15 Q Uh-huh. And each time that you were  
15:29:13 16 aware of, his mother would then tell you about it?  
15:29:16 17 A She would tell me about it.  
15:29:17 18 Q And what would she say?  
15:29:19 19 A She say she would tell him that -- that  
15:29:23 20 Jackson can do -- you know, he can go out whoever  
15:29:27 21 he would go out with.  
15:29:29 22 Q That's your decision, not anybody

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15:29:30 1 else's?  
15:29:31 2 A That's correct.  
15:29:31 3 Q And she told you that; right?  
15:29:33 4 A Yes.  
15:29:33 5 Q And when were these conversations with  
15:29:35 6 the apostle about this, when did they take place?  
15:29:38 7 A Couple years. One recently before -- I  
15:29:42 8 think one was -- the last one was around -- I want  
15:29:48 9 to say September -- September -- when she came out  
15:29:54 10 of the hospital, I believe.  
15:29:56 11 Q September right before she died or the  
15:29:59 12 year before?  
15:30:00 13 A No, let's strike that, strike that.

15:30:04 14 Q Uh-huh.  
15:30:06 15 A It wasn't too long before then.  
15:30:07 16 Q Before she died?  
15:30:08 17 A Yeah.  
15:30:09 18 Q And how -- you think there were about  
15:30:11 19 three of these conversations where Joel went to  
15:30:13 20 her and she went to you?  
15:30:14 21 A Joel went to him, yeah.  
15:30:16 22 Q And each time she told you you can go

0310

15:30:17 1 out with who you want?  
15:30:19 2 A She didn't say. She said to -- to him  
15:30:21 3 that I can go out with whoever I want to go out  
15:30:23 4 with.  
15:30:24 5 Q And what did she tell you?  
15:30:26 6 A That's what she tell me.  
15:30:27 7 Q She said, I told him that?  
15:30:29 8 A Yeah.  
15:30:29 9 Q And was he complaining it was not  
15:30:31 10 appropriate for you to go out with so many women?  
15:30:33 11 A No.  
15:30:34 12 Q Was Joel complaining about that?  
15:30:35 13 A He complained about it.  
15:30:36 14 Q All right. How many women did you go  
15:30:38 15 out -- have you gone out with in the congregation?  
15:30:40 16 MR. MARKS: Let me object to that  
15:30:41 17 question.  
15:30:42 18 MR. MALONEY: Well, I mean --  
15:30:42 19 MR. MARKS: You may answer if you know.  
15:30:42 20 BY MR. MALONEY:  
15:30:43 21 Q Are we in triple figures or what?  
15:30:47 22 A No, we not in triple figures.

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15:30:47 1 MS. KILLEN: Remember that Viagra.  
15:30:48 2 BY MR. MALONEY:  
15:30:50 3 Q Uh-huh. You seem pretty popular here.  
15:30:53 4 A No.  
15:30:53 5 Q Uh-huh.  
15:30:53 6 A No, not that way.  
15:30:54 7 Q Uh-huh. I'm not suggesting that way,  
15:30:56 8 but how many women do you think -- in the members  
15:30:58 9 of the congregation do you think you've gone out  
15:31:00 10 with so far?  
15:31:01 11 A Maybe about three.

15:31:02 12 Q About three, okay.  
15:31:07 13 A Uh-huh.  
15:31:07 14 Q Has anyone ever accused you of  
15:31:11 15 mishandling any money from one of the apostle's  
15:31:14 16 tenants at one of her rental apartments?  
15:31:16 17 A No.  
15:31:16 18 Q Has there ever been any issue that  
15:31:18 19 arose with respect to your handling of money from  
15:31:21 20 one of the rental apartments?  
15:31:23 21 A No.  
15:31:23 22 Q Did you handle the money from the

0312

15:31:25 1 rental apartments?  
15:31:26 2 A No.  
15:31:26 3 Q Did you have any role with that  
15:31:28 4 whatsoever?  
15:31:31 5 A No. The money would come into the  
15:31:33 6 office.  
15:31:34 7 Q And then who took it from there?  
15:31:36 8 A The secretary.  
15:31:37 9 Q How about dealing with any of the  
15:31:39 10 tenants financially? Did you ever --  
15:31:41 11 A No.  
15:31:42 12 Q So you've never -- did you know who the  
15:31:44 13 tenants were?  
15:31:45 14 A Pretty much, yeah.  
15:31:46 15 Q And why did you have occasion to know  
15:31:47 16 who the tenants were?  
15:31:49 17 A Well, I would put an ad in the paper.  
15:31:53 18 I would, you know -- you know.  
15:31:56 19 Q So you advertised for --  
15:31:57 20 A I advertised them for it, yeah.  
15:31:59 21 Q When it became vacant; is that correct?  
15:32:01 22 A Yes.

0313

15:32:02 1 Q And did you ever have any transactions  
15:32:03 2 with any of the tenants yourself?  
15:32:05 3 A No.  
15:32:06 4 Q Not at any time?  
15:32:09 5 A What do you mean "transactions"?  
15:32:11 6 Q I mean financial transactions.  
15:32:16 7 A Oh, no. Only when they first put a  
15:32:18 8 deposit down.  
15:32:19 9 Q And how would that work?

15:32:21 10 A They would sign the lease and put a  
15:32:27 11 deposit down --  
15:32:27 12 Q Uh-huh.  
15:32:27 13 A -- and I would turn it into the office.  
15:32:28 14 Q All right. Now, tell me about this  
15:32:28 15 business with the armor bearers and this incident  
15:32:29 16 here, okay?  
15:32:30 17 A Uh-huh.  
15:32:30 18 Q Now, the armor bearers is a title  
15:32:32 19 within the church; is that correct?  
15:32:33 20 A Yes.  
15:32:34 21 Q And, in fact, the apostle, she had  
15:32:35 22 armor bearers; right?

0314

15:32:37 1 A That's correct.  
15:32:38 2 Q Who were her armor bearers?  
15:32:40 3 A Shonda, Dr. Martin. Gee. And I can't  
15:32:49 4 remember names now.  
15:32:50 5 Q What were the jobs of the armor  
15:32:52 6 bearers?  
15:32:53 7 A They would take care of the pastor  
15:32:55 8 from -- on the pulpit, ride with her at home.  
15:33:00 9 Q Uh-huh.  
15:33:00 10 A Just be at her, you know, service,  
15:33:02 11 bring her water or whatever that she needs.  
15:33:04 12 Q Okay. And are there armor bearers at  
15:33:07 13 the church now?  
15:33:08 14 A Yes.  
15:33:09 15 Q And who are they?  
15:33:12 16 A I would say William Jackson,  
15:33:17 17 Keith Moore.  
15:33:21 18 Q Uh-huh.  
15:33:20 19 A Lionel -- I don't know his last name.  
15:33:23 20 Q And who made them the armor bearers?  
15:33:25 21 A Joel did.  
15:33:26 22 Q Okay. And they're generally recognized

0315

15:33:28 1 to be the armor bearers?  
15:33:30 2 A Yes.  
15:33:30 3 Q All right. And this incident that you  
15:33:32 4 say involved you and the armor bearers, when did  
15:33:34 5 that happen?  
15:33:35 6 A Two Mondays ago.  
15:33:37 7 Q All right. And what was everybody

15:33:39 8 doing there two Mondays ago?  
15:33:42 9 A They were changing the lock on the  
15:33:44 10 pastor --  
15:33:47 11 Q Uh-huh.  
15:33:47 12 A -- apartment.  
15:33:48 13 Q Well, was that a lock --  
15:33:50 14 A I mean, her suite in her conference  
15:33:52 15 room.  
15:33:53 16 Q Was that a lock that had recently been  
15:33:55 17 changed by you or people at your direction?  
15:33:58 18 A Yes.  
15:33:58 19 Q And they were changing it back?  
15:33:59 20 A Yes.  
15:34:00 21 Q And did they successfully do that?  
15:34:02 22 A Yes.

0316

15:34:02 1 Q And how long after you changed the lock  
15:34:03 2 did they change it back?  
15:34:05 3 A Few days.  
15:34:05 4 Q And --  
15:34:06 5 A I hadn't changed it since they changed  
15:34:08 6 it.  
15:34:11 7 Q So, in other words, it remains in the  
15:34:13 8 condition that they left it now --  
15:34:15 9 A Yes.  
15:34:15 10 Q -- correct?  
15:34:16 11 You going to go back and change it  
15:34:18 12 again?  
15:34:18 13 A Well, it's up to the board.  
15:34:19 14 Q How long is this going to go back and  
15:34:21 15 forth with these locks?  
15:34:24 16 A (Indicating.)  
15:34:25 17 Q They -- so they were there to change  
15:34:27 18 the locks back and they did so; correct?  
15:34:29 19 A Yes.  
15:34:30 20 Q And is it following that that they had  
15:34:31 21 this incident that you claimed happened with you  
15:34:34 22 and them?

0317

15:34:34 1 A Yeah, the locks were being changed at  
15:34:37 2 the time.  
15:34:37 3 Q Oh, at the time of the incident?  
15:34:39 4 A Yes.  
15:34:39 5 Q So they were there --

15:34:40 6 A Changing --  
15:34:41 7 Q -- outside the suite with -- changing  
15:34:44 8 the locks?  
15:34:45 9 A (Witness nods head.)  
15:34:45 10 Q And was it Jackson -- William Jackson  
15:34:51 11 and Keith Moore and you?  
15:34:52 12 A It was William Jackson --  
15:34:54 13 Q Uh-huh.  
15:34:52 14 A -- Keith Moore --  
15:34:58 15 Q Uh-huh.  
15:34:57 16 A -- Bruce Crawford --  
15:35:00 17 Q Uh-huh.  
15:34:59 18 A -- Joel --  
15:35:01 19 Q Uh-huh.  
15:35:00 20 A -- Lionel --  
15:35:02 21 Q Uh-huh.  
15:35:02 22 A -- and the locksmith.

0318

15:35:04 1 Q And who was the locksmith?  
15:35:07 2 A I -- it didn't -- it didn't --  
15:35:09 3 Q Outside contractor?  
15:35:10 4 A Yeah.  
15:35:11 5 Q All right. And you?  
15:35:11 6 A Yeah.  
15:35:12 7 Q Anyone from your team there?  
15:35:14 8 A Well, the office personnel were there.  
15:35:17 9 Q Who is that?  
15:35:18 10 A Denise Killen and --  
15:35:21 11 Q Uh-huh.  
15:35:21 12 A -- Dorothy Williams and Deacon Boswell.  
15:35:25 13 Q So this was there for everybody to see?  
15:35:28 14 A Yep.  
15:35:28 15 Q And what happened?  
15:35:29 16 A Well, I came into the building  
15:35:30 17 downstairs.  
15:35:32 18 Q Uh-huh.  
15:35:32 19 A And I told Keith Moore and  
15:35:37 20 William Jackson -- they met me coming in  
15:35:40 21 downstairs.  
15:35:42 22 Q Uh-huh.

0319

15:35:42 1 A And I told them that if they have a  
15:35:44 2 master key and the code to the -- to the building,  
15:35:51 3 they not authorized.

15:35:54 4 Q Uh-huh.  
15:35:54 5 A So I turned to go upstairs, and they  
15:35:56 6 grabbed me. And I told them, put your hands --  
15:35:59 7 get your hands off of me.  
15:36:02 8 Q Uh-huh.  
15:36:02 9 A And so they -- they took their hands  
15:36:05 10 off of me. So I went upstairs and --  
15:36:10 11 Q Did they take their hands off you as  
15:36:12 12 soon as you tell them to do that?  
15:36:14 13 A Yes, I did -- yes, they did.  
15:36:15 14 Q And why did they have their hands on  
15:36:17 15 you? What, were they stopping you from doing  
15:36:19 16 something?  
15:36:19 17 A Stopping me from going upstairs.  
15:36:21 18 Q To see what was going on with the  
15:36:22 19 locks?  
15:36:23 20 A I assume.  
15:36:23 21 Q Okay. And then what happened?  
15:36:24 22 A And when I went upstairs --

0320

15:36:28 1 Q Uh-huh.  
15:36:28 2 A -- the locksmith was changing the lock  
15:36:30 3 on the conference room.  
15:36:31 4 Q Uh-huh.  
15:36:32 5 A And so I told the con -- the locksmith  
15:36:38 6 that I want the old lock. So I reached over to  
15:36:42 7 bend over to tell him, and that's when Joel  
15:36:45 8 grabbed me and said, no, don't you go past -- you  
15:36:50 9 know, don't go past this. In other words, he was  
15:36:53 10 stopping me from going into the conference room.  
15:36:56 11 Q Uh-huh.  
15:36:56 12 A And then the other guys grabbed me.  
15:36:58 13 Q Uh-huh.  
15:36:59 14 A And so I said, get your hands off of  
15:37:01 15 me.  
15:37:04 16 Q Uh-huh.  
15:37:04 17 A And that's --  
15:37:06 18 THE WITNESS: Yeah, I did, Joel. You  
15:37:07 19 know I did.  
15:37:08 20 MR. MARKS: Mr. Jackson, please.  
15:37:08 21 BY MR. MALONEY:  
15:37:09 22 Q Dir -- dir -- direct -- direct your

0321

15:37:10 1 testimony to the reporter.

15:37:11 2 A He's talking to me.  
15:37:12 3 Q Direct your testimony to the reporter.  
15:37:14 4 Go ahead. Finish --  
15:37:14 5 A And --  
15:37:14 6 Q Finish your answer.  
15:37:15 7 A And I said, get your hands off of me.  
15:37:19 8 Q Uh-huh.  
15:37:19 9 A So they got their hands off of me.  
15:37:22 10 Q Uh-huh.  
15:37:22 11 A And so I say to William Jackson, don't  
15:37:27 12 you -- don't you touch me anymore.  
15:37:29 13 Q Uh-huh.  
15:37:29 14 A And by that time, Josh --  
15:37:35 15 Q Uh-huh.  
15:37:35 16 A -- his nephew, came out of the  
15:37:38 17 office --  
15:37:38 18 Q Uh-huh.  
15:37:38 19 A -- and say, get your hands off of  
15:37:44 20 Deacon Jackson.  
15:37:45 21 Q Uh-huh.  
15:37:45 22 A And then that's when he charge Joel.

0322

15:37:45 1 Q Who charged Joel (sic)?  
15:37:47 2 A Joel -- Joel did.  
15:37:50 3 Q Joel charged who?  
15:37:51 4 A His nephew Josh, and they were holding  
15:37:54 5 him back.  
15:37:54 6 Q His nephew Josh charged who?  
15:37:57 7 A No. Josh came out --  
15:38:00 8 Q Uh-huh.  
15:38:00 9 A -- and told Joel and them, don't put  
15:38:04 10 your hands on Deacon Jackson.  
15:38:07 11 Q Okay.  
15:38:07 12 A So that's when Joel charged at Josh.  
15:38:13 13 Q Charged at Josh?  
15:38:14 14 A Yes.  
15:38:14 15 Q Okay. And what happened?  
15:38:16 16 A So they were holding each other, they  
15:38:17 17 were holding Joel back.  
15:38:19 18 Q Uh-huh.  
15:38:21 19 A And we were holding Josh back.  
15:38:22 20 Q I see. And who was holding Joel back?  
15:38:26 21 A All his armor bearers.  
15:38:28 22 Q So his armor bearers were physically



15:38:30 1 holding him back?  
15:38:32 2 A Yes.  
15:38:32 3 Q And who was holding Josh back?  
15:38:34 4 A I was holding him back; Deacon Boswell  
15:38:37 5 was holding him back.  
15:38:38 6 Q And they were all holding -- who else  
15:38:41 7 was watching all this?  
15:38:42 8 A All the girls in the office.  
15:38:43 9 Q Uh-huh. You mean the ladies?  
15:38:44 10 A Yeah.  
15:38:44 11 Q And did the locksmith see all this,  
15:38:46 12 too?  
15:38:46 13 A I don't know. I guess he was still on  
15:38:48 14 his knees changing lock.  
15:38:50 15 Q Was he co -- covering his eyes or did  
15:38:52 16 he actually see all this, too?  
15:38:54 17 A I wouldn't have any idea.  
15:38:55 18 Q All right. And this initial contact  
15:38:56 19 with Joel, he was trying to physically stop you  
15:38:59 20 from going in the direction of the locksmith?  
15:39:01 21 A Yes.  
15:39:01 22 Q And you say he put his hand out like

15:39:04 1 this (indicating)?  
15:39:04 2 A Yes.  
15:39:05 3 Q And you walked into his hand; is that  
15:39:06 4 right?  
15:39:07 5 A No. I was bending over to tell the  
15:39:09 6 locksmith.  
15:39:11 7 Q To do what?  
15:39:12 8 A That I want the locks that he took off.  
15:39:14 9 Q Uh-huh.  
15:39:15 10 A And --  
15:39:15 11 Q So that you could put them back on  
15:39:16 12 later?  
15:39:17 13 A No, you couldn't, because they were  
15:39:18 14 damaged. I just wanted them.  
15:39:20 15 Q For what? A souvenir?  
15:39:22 16 A I just wanted them. They were my --  
15:39:23 17 they belonged to the church property.  
15:39:25 18 Q Okay. Well, what'd you do with them?  
15:39:28 19 A I just wanted the property back.  
15:39:30 20 That's all.  
15:39:31 21 Q So you were bending over to talk to the

15:39:34 22 locksmith who was down on the ground changing the

0325

15:39:37 1 locks; is that correct?

15:39:38 2 A Yeah. Yeah.

15:39:38 3 Q And Joel put his hand there to keep you  
15:39:40 4 from going in the direction --

15:39:41 5 A No, he said, don't go past here.

15:39:43 6 Q Because he didn't want you going in the  
15:39:44 7 direction of the locksmith; correct?

15:39:45 8 A Well, he didn't want me to go into the  
15:39:47 9 office --

15:39:48 10 Q Okay.

15:39:47 11 A -- in the conference room.

15:39:49 12 Q Okay. And did you say anything to  
15:39:51 13 Joel, or did you just keep going?

15:39:52 14 A I told Joel -- I said, get your hands  
15:39:55 15 off of me, and the rest of them, get your hands  
15:40:01 16 off of me.

15:40:01 17 Q Well, did Joel take his hand off of you  
15:40:02 18 as soon as you said that?

15:40:03 19 A Yes, he did. Yes, he did.

15:40:03 20 Q All right. You're not saying Joel  
15:40:04 21 assaulted you or anything, are you?

15:40:06 22 A He put his hands on me.

0326

15:40:08 1 Q Well, my question's different. I'm  
15:40:10 2 asking you now, under oath, in front of God and  
15:40:12 3 the world, are you saying that Pastor Peebles,  
15:40:15 4 Joel Peebles, Senior, your pastor at the church,  
15:40:17 5 assaulted you?

15:40:18 6 A He's not my pastor.

15:40:20 7 MR. MARKS: I'm going to object. I'm  
15:40:21 8 going to --

15:40:21 9 BY MR. MALONEY:

15:40:21 10 Q He's your assistant pastor.

15:40:24 11 MR. MARKS: I'm going to object to that  
15:40:25 12 line of questioning. It calls for a legal answer.

15:40:27 13 BY MR. MALONEY:

15:40:28 14 Q I'm not asking for a legal answer. I'm  
15:40:29 15 just asking you, in your judgment, did your  
15:40:30 16 assistant pastor assault you?

15:40:32 17 A I don't want to answer.

15:40:34 18 Q I know you don't want to answer. None  
15:40:34 19 of us want to even be here, but you're being asked

15:40:37 20 the question.  
15:40:39 21 A I would consider it assault.  
15:40:41 22 Q I see. You -- you going to do anything

0327

15:40:42 1 about it?  
15:40:43 2 A Pardon me?  
15:40:44 3 Q You doing anything about it?  
15:40:45 4 A No.  
15:40:46 5 Q All right. The -- and these other  
15:40:47 6 armor bearers, did they assault you, too?  
15:40:52 7 A Yeah.  
15:40:53 8 Q Okay. You do anything about that?  
15:40:54 9 A No.  
15:40:55 10 Q All right. Bygones be bygones?  
15:40:59 11 A That's -- yeah.  
15:40:59 12 Q Okay. The -- you ever been assaulted  
15:41:02 13 by Joel any other time other than that?  
15:41:04 14 A No.  
15:41:17 15 Q Okay. You ever known Joel not to tell  
15:41:19 16 the truth?  
15:41:19 17 A Yes.  
15:41:20 18 Q Tell me about that.  
15:41:20 19 A He would -- he would promise people,  
15:41:22 20 when they were at the school, jobs and raise --  
15:41:25 21 Q Uh-huh.  
15:41:25 22 A -- without pastor's permission.

0328

15:41:29 1 Q Uh-huh. I'm going to ask you to  
15:41:30 2 distinguish between state -- a statement of fact  
15:41:33 3 that's incorrect or false about a past or present  
15:41:37 4 event as a proposed (sic) to or differentiated  
15:41:43 5 from a promise of future action, okay? And a  
15:41:47 6 promise of future action such as I will give you a  
15:41:49 7 job, a commitment that was not kept is one thing.  
15:41:52 8 What I'm asking you about is lies. Somebody says  
15:41:55 9 it's ten o'clock when it's really four o'clock,  
15:41:57 10 okay, or I didn't take the money when they really  
15:42:00 11 did.  
15:42:00 12 Have you ever known Joel to tell a lie?  
15:42:15 13 A Well, I'm consider that. I hear what  
15:42:24 14 you're saying.  
15:42:25 15 Q Okay. Why don't you think about it and  
15:42:27 16 give me your answer.  
15:42:32 17 A Yeah.

15:42:32 18 Q No?  
15:42:33 19 A Yeah.  
15:42:33 20 Q You know -- when -- when was that that  
15:42:34 21 you --  
15:42:35 22 A He lie on me.

0329

15:42:36 1 Q When did he lie on you?  
15:42:38 2 A Saying that I go with all these women  
15:42:39 3 at the church.  
15:42:44 4 Q So he misestimated the number?  
15:42:45 5 A Well, he lied to his mother that I go  
15:42:46 6 to all these women in the church.  
15:42:47 7 Q Uh-huh. And what was the truth?  
15:42:48 8 A That's not the truth.  
15:42:49 9 Q Okay. What was the truth?  
15:42:50 10 A That's not the truth.  
15:42:53 11 Q All right. And other than lying --  
15:42:55 12 what you say was lying about the number of women  
15:42:57 13 you go out with, any other time that you're aware  
15:42:59 14 of Joel Peebles telling a lie?  
15:43:03 15 A I can't recall at this time.  
15:43:04 16 Q Okay. How about William Meadows; do  
15:43:07 17 you know him to be a truthful person?  
15:43:14 18 A I'm not aware.  
15:43:15 19 Q You don't know one way or the other?  
15:43:17 20 A One way or the other, right.  
15:43:19 21 Q You ever known him to tell a lie?  
15:43:20 22 A I've never known him, no.

0330

15:43:22 1 Q Okay.  
15:43:29 2 MR. MALONEY: Let's take just a -- 30  
15:43:29 3 seconds. We may be --  
15:43:29 4 (Sotto voce discussion.)  
15:43:29 5 MR. MALONEY: Okay. That's all we have  
15:43:30 6 for right now. If the belated document production  
15:43:33 7 raises more issues, we'll contact your counsel  
15:43:37 8 about resuming depositions, but this'll suspend it  
15:43:40 9 for now.  
15:43:41 10 THE VIDEOGRAPHER: Here ends today's  
15:43:42 11 deposition. Going off the record. The time is  
15:43:45 12 3:43 p.m.  
13  
14  
15

16 (Signature having not been waived, the  
17 Videotaped Deposition of CLARENCE JACKSON ended at  
18 3:43 p.m.)  
19  
20  
21  
22

0331

1 ACKNOWLEDGMENT OF DEPONENT  
2 I, Clarence Jackson, do hereby  
3 acknowledge that I have read and examined the  
4 foregoing testimony, and the same is a true,  
5 correct and complete transcription of the  
6 testimony given by me and any corrections appear  
7 on the attached Errata sheet signed by me.  
8  
9

10  
11 \_\_\_\_\_  
12 (DATE) (SIGNATURE)  
13  
14

15 CERTIFICATE OF NOTARY PUBLIC  
16 Sworn and subscribed to before me this  
17 \_\_\_\_\_ day of \_\_\_\_\_,  
18  
19  
20 \_\_\_\_\_  
21 NOTARY PUBLIC MY COMMISSION EXPIRES  
22

0332

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC  
2 I, Dana C. Ryan, Registered Professional  
3 Reporter, Certified Realtime Reporter, the officer  
4 before whom the foregoing proceedings were taken  
5 do hereby certify that the foregoing transcript is  
6 a true and correct record to the best of my  
7 ability of the proceedings; that said proceedings  
8 were taken by me stenographically and thereafter  
9 reduced to typewriting under my supervision; and  
10 that I am neither counsel for, related to, nor  
11 employed by any of the parties to this case and  
12 have no interest, financial or otherwise, in its  
13 outcome.

14 IN WITNESS WHEREOF, I have hereunto set  
 15 my hand and affixed my notarial seal this 5th day  
 16 of June 2011.  
 17 My Commission expires:  
 18 May 1, 2013  
 19  
 20 \_\_\_\_\_  
 21 NOTARY PUBLIC IN AND FOR THE  
 22 STATE OF MARYLAND

0333

1 E R R A T A S H E E T  
 2 IN RE: JERICO BAPTIST CHURCH MINISTRIES, INC.,  
 3 v. JOEL R. PEEBLES, SR., et al.  
 4 RETURN BY: \_\_\_\_\_  
 5 PAGE LINE CORRECTION AND REASON  
 6 \_\_\_\_\_  
 7 \_\_\_\_\_  
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 21 \_\_\_\_\_  
 22 (DATE) (SIGNATURE)

0334

1 E R R A T A S H E E T  
 2 IN RE: JERICO BAPTIST CHURCH MINISTRIES, INC.,  
 3 v. JOEL R. PEEBLES, SR., et al.  
 4 RETURN BY: \_\_\_\_\_  
 5 PAGE LINE CORRECTION AND REASON  
 6 \_\_\_\_\_  
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