

In The Matter Of:

***BOARD OF TRUSTEES OF THE JERICHO BAPTIST CHURCH
MINISTRIES, INC.***

v.

JOEL R. PEEBLES, SR., ET AL.

GLORIA McCLAM-MAGRUDER, Ph.D. - Vol. I
May 10, 2011

MERRILL LAD

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

CIRCUIT COURT OF PRINCE GEORGE'S COUNTY, MARYLAND

- - - - - x
 Board of Trustees of :
 the Jericho Baptist :
 Church Ministries, :
 Inc., :
 Plaintiff/ :
 Counter-Defendant, : Case No.
 v. : CAL 10-33647
 Joel R. Peebles, :
 Sr., et al., :
 Defendants/ :
 Counter-Plaintiffs, :
 - - - - - x

VOLUME 1 - Videotaped Deposition of

GLORIA McCLAM-MAGRUDER, Ph.D.

Greenbelt, Maryland

May 10, 2011

10:08 a.m.

Job No: 1-199092

Pages: 1 - 281

Reported by: Sue A. Terry, RPR/CRR/CLR

Page 2	Page 4
<p>1 Videotaped Deposition of GLORIA 2 McClAM-MAGRUDER, Ph.D., taken at the law offices of: 3 Joseph, Greenwald & Laake, P.A. 4 6404 Ivy Lane 5 Suite 400 6 Greenbelt, Maryland 20770</p> <p>7 8 9 10 11 Pursuant to Notice, before Sue A. Terry, 12 Registered Professional Reporter, Certified Realtime 13 Reporter and Notary Public in and for the State of 14 Maryland.</p> <p>15 16 17 18 19 20 21 22</p>	<p>1 ALSO PRESENT: (Continued) 2 Pastor Joel Peebles, Sr. 3 William Meadows</p> <p>4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>
Page 3	Page 5
<p>1 A P P E A R A N C E S 2 ON BEHALF OF PLAINTIFF/COUNTER-DEFENDANT: 3 ISAAC H. MARKS, SR., ESQ. 4 11785 Beltsville Drive 5 10th Floor 6 Calverton, Maryland 20705 7 Phone: 301-572-7900</p> <p>8 ON BEHALF OF DEFENDANTS/COUNTER-PLAINTIFFS: 9 TIMOTHY F. MALONEY, ESQ. 10 Joseph Greenwald & Laake, P.A. 11 6404 Ivy Lane 12 Suite 400 13 Greenbelt, Maryland 20770 14 Phone: 240-553-1206</p> <p>15 ALSO PRESENT: 16 Akim Graham, Videographer 17 JOSEPH CREED, ESQ. (Present by LiveNote Stream) 18 BOBBY HENRY, ESQ. (Present by LiveNote Stream) 19 Clarence Jackson 20 Clifford Boswell 21 Denise Killen 22 Dorothy Williams</p>	<p>1 C O N T E N T S 2 Witness Name: Page 3 Gloria McClam Magruder 4 Exm. By Mr. Maloney 7 5 Exm. By Mr. Marks 227 6 7 EXHIBITS (Exhibits retained) 8 9 Exhibit Description Page 10 Defts. Response to Defendants' First Set 28 11 Ex. 1 of Interrogatories. 12 Defts. Black binder with tabbed 130 13 Ex. 2 documents. 14 15 Plf. Trustee Acknowledgement. 228 16 Ex. A 17 18 19 20 21 22</p>

Page 6

1 PROCEEDINGS
 2 THE VIDEOGRAPHER: Here begins
 3 Videotape Number 1 in the deposition of Gloria
 4 McClam-Magruder in the matter of the Board of
 5 Trustees of the Jericho Baptist Church Ministries,
 6 Incorporated, versus Joe R. Peebles, Sr., et al., in
 7 the Circuit Court for Prince Georges County,
 8 Maryland, Case Number CAL 1033647.
 9 Today's date is May 10th, 2011. The
 10 time on the video monitor is 10:08 a.m., and the
 11 video operator today is Akim Graham.
 12 This deposition is taking place at
 13 Joseph, Greenwald & Laake at 6404 Ivy Lane,
 14 Greenbelt, Maryland.
 15 Would counsel please voice identify
 16 yourselves and state whom you represent.
 17 MR. MALONEY: Timothy Maloney for the
 18 defense.
 19 MR. MARKS: Isaac Marks for the
 20 Plaintiff.
 21 THE VIDEOGRAPHER: The court reporter
 22 today is Sue Terry of Merrill LAD.

Page 7

1 Would the reporter please swear in the
 2 witness.
 3 GLORIA McCLAM-MAGRUDER
 4 having been duly sworn, testified as follows:
 5 EXAMINATION BY COUNSEL FOR
 6 DEFENDANTS/COUNTER-PLAINTIFFS
 7 BY MR. MALONEY:
 8 Q Ms. McClam-Magruder, good morning.
 9 A Good morning.
 10 Q Would you tell the reporter your full name
 11 and current home address.
 12 A Sure. It's Gloria McClam-Magruder, 5913
 13 East Bonwood Turn in Clinton, Maryland, 20735.
 14 Q Ms. McClam-Magruder, have you ever had your
 15 deposition taken before?
 16 A I have on a military base, but not, you
 17 know, this formal here.
 18 Q Just briefly, what were the circumstances in
 19 that case?
 20 A It was an employee that I had to terminate.
 21 Q So this was an employee disciplinary in the
 22 military system?

Page 8

1 A Uh-huh.
 2 Q Okay. Well, what will happen today is, I
 3 will ask you a series of questions and you'll be
 4 asked to respond under oath.
 5 If at any time you don't understand the
 6 question, just say so and I'll be glad to repeat it.
 7 If at any time you need a break, just let me
 8 know and I'll be glad to accommodate you.
 9 It's very important that you give verbal
 10 responses and not a head nod or an "uh-huh," because
 11 we have a court reporter here who is preparing a
 12 transcript and, in fact, is preparing what's known as
 13 a LiveNote transcript for LiveNotes transmission, and
 14 also, a transcript that will be bound and given to
 15 you for review and you'll have 30 days from today's
 16 date to review that transcript if there have been any
 17 errors in transcription to change that.
 18 Usually, our reporters are pretty good, but
 19 if there's an error, you can correct a mistake in
 20 what was taken down.
 21 Do you basically understand the ground
 22 rules?

Page 9

1 A Yes, I do.
 2 Q Okay. And if -- and again, if there's any
 3 question I ask that you're not clear on, just say so
 4 and I'll be more than happy to rephrase it.
 5 A Sure.
 6 Q Okay. What is your date of birth?
 7 A 11-1-52.
 8 Q Okay. And tell me a little bit about your
 9 educational background and then we'll talk about your
 10 work background.
 11 Where did you grow up?
 12 A I grew up in Lake City, South Carolina.
 13 Q Uh-huh. And where did you go to school?
 14 A I went to -- you mean grade school?
 15 Q Grade school -- we'll just walk our way up.
 16 A I went do Carver Elementary and Carver High
 17 School.
 18 Q And where is that?
 19 A Lake City, South Carolina.
 20 Q And when did you graduate from high school?
 21 A I graduated in 1970.
 22 Q Okay. And after graduating from high

Page 10	Page 12
1 school, what did you do?	1 graduate from UDC, if you know?
2 A I came to D.C. --	2 A I graduated in 1983, I do believe.
3 Q Uh-huh.	3 Q Uh-huh. Uh-huh. And then you went to
4 A -- to attend college.	4 Trinity after that?
5 Q Uh-huh. And where did you go to college?	5 A Yes, and I graduated from there in 1986, I
6 A The first college or business school -- I	6 do believe.
7 attended business school first at Cortez Peters.	7 Q And what you did study at Trinity?
8 Q Oh, yeah, uh-huh.	8 A Guidance counseling, uh-huh.
9 A You remember that, huh?	9 Q Uh-huh. My mother graduated from Trinity
10 Q Uh-huh. Uh-huh.	10 and taught social work there.
11 A And after that, I went to the University of	11 A Oh, really?
12 the District of D.C.	12 Q Uh-huh. So you got your Master's in
13 Q Uh-huh.	13 guidance counsel from Trinity?
14 A And then I went for my Master's at Trinity	14 A Uh-huh. Uh-huh.
15 University.	15 Q And then after that, you went to --
16 Q Uh-huh.	16 A Maranatha in Florida --
17 A And then I got my Ph.D. --	17 Q Uh-huh.
18 Q Uh-huh.	18 A -- and got a clinical psychology degree.
19 A -- at Maranatha --	19 Q Uh-huh. And did you work during your
20 Q Uh-huh.	20 attendance at all these schools or --
21 A -- out of Florida.	21 A I sure did.
22 Q When you went to Cortez Peters, did you get	22 Q Where did you work?
Page 11	Page 13
1 a degree or a certificate of any kind?	1 A I worked for D.C. public schools --
2 A I got a degree --	2 Q Uh-huh.
3 Q Uh-huh.	3 A -- in the administration building.
4 A -- in business.	4 Q Uh-huh.
5 Q Uh-huh.	5 A Also, I taught a little while at D.C. Public
6 A I learned how to do shorthand.	6 Schools at H.D. Woodson.
7 Q Very good.	7 Q Uh-huh.
8 A I thought that's what I wanted to do -- be a	8 A Then I just kind of started with school
9 secretary -- but then I realized that's not what I	9 full-time.
10 wanted to do.	10 Q Uh-huh.
11 Q So then you went to UDC?	11 A Then I went back to the administration
12 A Uh-huh.	12 building to work -- D.C. Public School Administration
13 Q And what course of studies did you pursue	13 Building to work.
14 that?	14 Q Uh-huh. So you start off in administration
15 A That was -- my degree was in secondary	15 with D.C. public; correct?
16 education, and also, social work.	16 A Uh-huh.
17 Q So this is elementary and secondary and	17 Q What was your job there?
18 social work?	18 A Now, let me back up.
19 A No, not elementary.	19 Q Sure.
20 Q Just secondary?	20 A I started off at McFarland Junior High
21 A Just secondary, uh-huh.	21 School.
22 Q Okay. And then after that, when did you	22 Q Uh-huh.

Page 14	Page 16
<p>1 A Okay? And there, I was the administrative 2 assistant there -- 3 Q Uh-huh. 4 A -- and then I left there and went to -- 5 Q Uh-huh. 6 A -- the Administration Building downtown. 7 It's on 12th Street at that time. 8 Q Uh-huh. 9 A Uh-huh. 10 Q And then what did you do -- what was your 11 job in the Administration Building? 12 A I worked in personnel. 13 Q Uh-huh. 14 A I'm trying to remember the title. I think 15 it was a Personnel Assistant job I went to -- 16 Q Uh-huh. 17 A -- I think, the first job. 18 Q Uh-huh. 19 A And then it changed and I -- it was an 20 administrative-level job. I can't remember the 21 title, but what we did was look over records of 22 teachers and certify them.</p>	<p>1 A Uh-huh. 2 Q And what year did you leave D.C. public 3 school system? 4 A That was in 1984, I do believe. 5 Q Uh-huh. And were you married in '84, as 6 well? 7 A I was married in '83, actually. 8 Q Eighty-three. Okay. What's your husband's 9 name? 10 A Gregory -- 11 Q Uh-huh. 12 A -- Wayne Magruder. 13 Q Uh-huh. And so then you began traveling 14 overseas with your husband; is that correct? 15 A I didn't go overseas. 16 Q Uh-huh. Where did you travel; domestically, 17 in the United States? 18 A I went to Alaska. 19 Q Uh-huh. 20 A And also to Louisiana. 21 Q Uh-huh. Okay. Did you basically follow 22 your husband's military career during his service?</p>
Page 15	Page 17
<p>1 Q Uh-huh. 2 A Uh-huh. 3 Q And how many years all totaled did you work 4 in the District of Columbia public school system? 5 A Maybe about eight years. 6 Q Okay. And what was your last job in the 7 system? 8 A Then I -- you're talking about in the -- 9 Q D.C. public school system; right? 10 A Teaching position. 11 Q And was that at McFarland or somewhere else? 12 A No, that was at H.D. Woodson. 13 Q At Woodson. Okay. What were you teaching 14 at Woodson? 15 A Social studies and sociology. 16 Q Uh-huh. And after leaving the public school 17 system, what did you do? 18 A Well, I got married -- 19 Q Uh-huh. 20 A -- and traveled with my husband in the 21 military. 22 Q Uh-huh.</p>	<p>1 A That's correct, uh-huh. 2 Q And when was he discharged? 3 A I think now -- don't hold me to these 4 dates -- I think it was 19 -- 5 MR. MARKS: Don't guess. 6 THE WITNESS: Ninety-one. 7 MR. MARKS: Don't guess. 8 THE WITNESS: Okay. 9 MR. MARKS: State what you know. 10 THE WITNESS: Okay. 11 BY MR. MALONEY: 12 Q Did you work while you were in Alaska or 13 Louisiana? 14 A I did work while I was in Alaska. 15 Q What did you do there? 16 A While I was in Alaska, I worked as an 17 Exceptional Family Member Director. These 18 are -- these were students or families who had 19 children -- 20 Q Uh-huh. 21 A -- who were exceptional. 22 Q Uh-huh. And you provided assistance to --</p>

5 (Pages 14 to 17)

Page 18

1 A I provided services for them.
2 **Q Okay.**
3 A Uh-huh.
4 **Q And after the discharge, what did you do**
5 **next -- you and your husband?**
6 A Well, after that, we went to Louisiana. At
7 the discharge, I remained in Louisiana.
8 **Q Uh-huh.**
9 A Uh-huh.
10 **Q And what did you do in Louisiana?**
11 A I worked for the federal government in
12 Louisiana.
13 **Q Uh-huh.**
14 A And I worked as an education assistant.
15 **Q Uh-huh.**
16 A Education -- no, education specialist, where
17 we had to train staff and that kind of stuff. It's
18 hard to remember all these titles.
19 **Q Uh-huh. Was that the United States**
20 **Department of Education you worked for?**
21 A No, no, it was Department of Army.
22 **Q The United States Department of the Army?**

Page 19

1 A Uh-huh.
2 **Q And how long did you work in that job?**
3 A From '90 to '93.
4 **Q Uh-huh. And then after that, what did you**
5 **do?**
6 A Then I moved to New Orleans.
7 **Q Uh-huh.**
8 A And I worked there from '93 to '95.
9 **Q Uh-huh. And then after that?**
10 A Then I came back on this side and I worked
11 at Fort Belvoir.
12 **Q Uh-huh. And what did you do there?**
13 A There, I was Assistant Director of Child
14 Development Services.
15 **Q Uh-huh. For the Department of the Army?**
16 A Yes, uh-huh.
17 **Q Okay. And how long did you do that for?**
18 A From '95 up to August 30th, 2010 --
19 **Q Uh-huh.**
20 A -- when I retired.
21 **Q Okay. So you retired from the Department of**
22 **the Army?**

Page 20

1 A Uh-huh.
2 **Q And what was your job at the time of the**
3 **retirement?**
4 A Assistant Director of Child Development
5 Services.
6 **Q Okay. Are you working now?**
7 A No, I'm not.
8 **Q Okay. And who do you live with at your**
9 **current residence?**
10 A Myself.
11 **Q Okay. And you're no longer married to**
12 **Mr. Magruder?**
13 A No, I'm not.
14 **Q Okay. Did that marriage end in divorce?**
15 A Yes.
16 **Q And when did that take place -- just**
17 **ballpark?**
18 A Nineteen ninety-one, I do believe.
19 **Q Okay. And you have been active in Jericho**
20 **for how long now?**
21 A Since 1975.
22 **Q Uh-huh. And how did you come to be active**

Page 21

1 **in Jericho in '75?**
2 A I think I was told about the church --
3 **Q Uh-huh.**
4 A -- and visited.
5 **Q Uh-huh. And where was the church located at**
6 **that time?**
7 A In the northeast.
8 **Q Uh-huh. And when you say "northeast" --**
9 A Northeast Washington, D.C.
10 **Q Uh-huh. Was that -- was it the Kenilworth**
11 **location or another location?**
12 A 4400 Douglas Street, if I remember
13 correctly.
14 **Q Uh-huh. And what was your involvement in**
15 **the church back in the seventies, if you recall?**
16 A I was the -- let me look at my notes here
17 and I'll be able to tell you, okay?
18 **Q Uh-huh.**
19 A It's been a long time ago.
20 **Q Sure. Take your time.**
21 A Uh-huh. I was president of the usher board.
22 **Q Uh-huh.**

<p style="text-align: right;">Page 22</p> <p>1 A I taught at the Christian Training Center in 2 college. 3 Q Uh-huh. 4 A I was the registrar for the college. 5 Q Uh-huh. 6 A I was Director of the Upper Room Prayer and 7 Counseling Center. 8 Q Uh-huh. 9 A I'm a Vice President of the Board of 10 Trustees. 11 Q Uh-huh. 12 A Also, I'm on the Board of Trustees for the 13 residences. 14 Q Uh-huh. Uh-huh. 15 A And I'm also the Vice President of the 16 Jericho Baptist Church Ministries. 17 Q Have you ever been paid for any of these 18 positions? 19 A I have been given a stipend -- 20 Q Uh-huh. 21 A -- not so much paid -- 22 Q Uh-huh.</p>	<p style="text-align: right;">Page 24</p> <p>1 A I don't think the stipend started 2 until -- maybe about August. 3 Q Uh-huh. Of 2009? 4 A I would have to check -- as far as I can 5 remember, maybe, uh-huh. 6 Q And when you say "a facilitator," what was 7 the job of facilitator for which you were receiving a 8 stipend? 9 A To oversee the school -- 10 Q Uh-huh. 11 A -- the academy. 12 Q Uh-huh. And what was the stipend that you 13 received? 14 A A thousand dollars per month. 15 Q And how did that arrangement come about; in 16 other words, who suggested it to you and how did it 17 work? 18 A The Apostle -- Apostle Betty Peebles -- 19 called me and asked me to do that for her. 20 Q Was this something you suggested or someone 21 else suggested or something that she came up with? 22 A Apostle Betty Peebles called me and asked</p>
<p style="text-align: right;">Page 23</p> <p>1 A -- when I was a facilitator -- 2 Q Uh-huh. 3 A -- at the college -- excuse me -- at the 4 academy. 5 Q Uh-huh. And when was that? 6 A That was -- I do believe it was -- I think 7 it was June through -- I'm thinking April. 8 Q Of what year? 9 A It was 2010 when I started -- 10 Q Uh-huh. 11 A -- I think June or July. 12 Q Uh-huh. 13 A -- and then it was April. 14 Q Of this year? 15 A Of -- let's back up. I'm sorry. 16 Q Okay. 17 A Two thousand nine -- 18 Q Okay. 19 A -- and then 2010, April. 20 Q All right. So, in other words, from June of 21 2009 to April of 2010, you received a stipend for 22 being a facilitator?</p>	<p style="text-align: right;">Page 25</p> <p>1 me. 2 Q Uh-huh. And how did the stipend come to an 3 end in April of 2010? 4 A My services were no longer needed at that 5 time. 6 Q Uh-huh. And why was that, if you know? 7 A I don't know. 8 Q Did somebody call you in and say, "We don't 9 need you serving as facilitator for the school"? 10 A The Apostle sent me a letter. 11 Q Uh-huh. Well, which Apostle sent you a 12 letter? 13 A Apostle Betty Peebles sent me a letter. 14 Q Well, she would have been -- that would have 15 been April of 2010 she did that? 16 A No, that's 2010. 17 Q Yeah, I didn't think so. 18 A It was -- yes, it was. 19 Q All right. So you believe it was 2010? 20 A Yes. 21 Q Okay. Now -- 22 A Because this is '11 year, the last year.</p>

7 (Pages 22 to 25)

Page 26

1 **Q** **Okay. That's fine. Do you -- have you made**
2 **notes to help you with the dates? I want to make**
3 **sure we're all correct on our dates here.**
4 A I hope I've got dates in here.
5 **Q Uh-huh.**
6 A Okay. What dates do you need?
7 **Q Why don't we do this so everybody, can --**
8 **including your counsel, can see what you're referring**
9 **to.**
10 **Let's mark that as an exhibit, if you can**
11 **hand that to the reporter.**
12 MR. MARKS: That's actually what I gave
13 you. That's just a copy of what I gave you this
14 morning?
15 MR. MALONEY: Are these the Answers to
16 Interrogatories?
17 MR. MARKS: Right.
18 MR. MALONEY: Let me take a real quick
19 look. Okay.
20 BY MR. MALONEY:
21 **Q Okay. When did you -- did you assist in**
22 **preparing these?**

Page 27

1 A Yes, I did.
2 **Q And when did you do that?**
3 A March.
4 **Q March of this year?**
5 A Yes, uh-huh.
6 MR. MALONEY: All right. Madam
7 reporter, let's mark this as --
8 MR. MARKS: Just so you know, that's
9 four different sets --
10 MR. MALONEY: Wait, wait, wait. Our
11 reporter can't -- are you ready -- okay, go ahead.
12 MR. MARKS: That's four different sets
13 of --
14 MR. MALONEY: Correct. Just showing
15 you one, just so we --
16 THE COURT REPORTER: I haven't marked
17 it.
18 MR. MALONEY: Okay. Let's all take a
19 break, so -- our reporter can't type and mark at the
20 same time.
21 MR. MARKS: That's four sets of --
22 MR. MALONEY: Correct.

Page 28

1 (Whereupon, Defendants' Exhibit 1:
2 Marked for identification.)
3 BY MR. MALONEY:
4 **Q Showing you what's marked as Defense 1, is**
5 **that the document you were just -- a copy of the**
6 **document you were just referring to a minute ago?**
7 **Is the answer yes? Are we looking at the**
8 **copy of the same document?**
9 A Oh, is that what you asked?
10 **Q Yes.**
11 A Yes, we're looking at the same document.
12 **Q Looking at Question -- Interrogatory**
13 **Question Number 11 --**
14 A Uh-huh.
15 **Q -- and you've just put a mark on it, that**
16 **gives us a thumbnail sketch of your history with the**
17 **church; is that correct?**
18 A To my knowledge, uh-huh.
19 **Q Okay. Thank you. Now, this lists on here**
20 **also membership on the Board of Trustees --**
21 A Uh-huh.
22 **Q -- at Jericho Baptist Church Ministries.**

Page 29

1 **Was there a time you were elected to the Board of**
2 **Trustees at Jericho?**
3 A Yes.
4 **Q All right. And tell me when that was.**
5 A That was March, '09.
6 **Q Okay. And I would like you to tell me what**
7 **you recall about the circumstances in which you were**
8 **elected to the board in March of '09?**
9 A I'm trying -- someone came to me in church
10 and asked me to meet the Apostle, the Apostle would
11 like to see me at the church.
12 And when I went to the office, it was that
13 she wanted me to be on the Board of Trustees.
14 **Q And then what happened?**
15 A There was paperwork that I needed to sign.
16 **Q Okay. And then what happened?**
17 A I signed the paperwork and that was it. Is
18 that what you're asking?
19 **Q Uh-huh.**
20 A Okay.
21 **Q Was this at a Sunday service that someone**
22 **came to you?**

Page 30

1 A It was at the Sunday service, uh-huh.
2 **Q Was that on March the 15th of 2009?**
3 A Somewhere around that date. I can't be
4 specific.
5 **Q Uh-huh. And who was it that came to you and**
6 **asked you to serve as a member of the Board of**
7 **Trustees -- or strike that.**
8 **Who came to you and asked you to come see**
9 **Apostle Betty Peebles.**
10 A I don't know whether or not it was --
11 MR. MARKS: Don't guess.
12 A I don't remember, actually.
13 BY MR. MALONEY:
14 **Q All right. So you have no recollection at**
15 **all as to who this person was?**
16 A I really don't remember.
17 **Q All right. Did you expect someone to come**
18 **to you and ask this or was this out of the blue?**
19 A I did not expect anyone to come to me.
20 **Q All right. And were you standing there**
21 **talking to someone when you were asked to come up and**
22 **see the Apostle, or what happened?**

Page 31

1 A I don't recall.
2 **Q Okay. And so you were taken to the**
3 **Apostle's office; is that correct?**
4 A I wasn't taken, I went.
5 **Q You were asked to go there?**
6 A Uh-huh.
7 **Q Is that correct?**
8 A Yes.
9 **Q And where was the Apostle's office located?**
10 A In the Administration Building.
11 **Q Uh-huh.**
12 A Uh-huh.
13 **Q And when you got to the Apostle's office,**
14 **who else was there?**
15 A I remember seeing Denise Killen.
16 **Q Uh-huh.**
17 A LaShonda -- I can't remember LaShonda's last
18 name right now.
19 **Q Uh-huh.**
20 A Deacon Jennie, I do believe.
21 **Q Want to spell that for our reporter?**
22 A D-e-a-c-o-n, Deacon, and Jennie,

Page 32

1 J-e-n-n-i-e.
2 **Q Uh-huh.**
3 A It's been so long ago, it's just hazy. I
4 just don't remember.
5 **Q Was there anyone else that was there?**
6 A I don't remember.
7 **Q And was Mr. Marks there?**
8 A No, he was not.
9 **Q And what did Apostle Betty Peebles ask you**
10 **specifically? What did she say and what did you say?**
11 A I asked her, "You called" -- or I said to
12 her, "You called?"
13 And she said, "Yes, I need you to sign some
14 papers here for the trustee board."
15 **Q And what did you say?**
16 A I said okay.
17 **Q Did she tell you that you were going to**
18 **serve on the trustee board or did she just ask you to**
19 **serve on the board or did she just ask you to sign**
20 **the papers?**
21 A Oh, no, she said I'll be serving on the
22 trustee board, uh-huh.

Page 33

1 **Q And did she tell you why she wanted you to**
2 **serve on the trustee board?**
3 A Not at that time, no.
4 **Q Did she tell you at any time why she wanted**
5 **you to serve on the Trustee Board?**
6 A To have a governing body of the church, and
7 she talked about, you know, not having done this, and
8 she needed to get it done, you know.
9 So that's basically what it was.
10 **Q When did she tell you that?**
11 A That could have been that evening
12 afterwards.
13 **Q Did she express -- did she ever express to**
14 **you any dissatisfaction with the current or previous**
15 **Board of Trustees?**
16 A We never discussed a current or previous
17 board.
18 **Q All right. So at no --**
19 **THE VIDEOGRAPHER:** Excuse me -- I'm
20 sorry -- I'm getting a lot of interference, maybe
21 from someone's BlackBerry.
22 **MR. MALONEY:** Does anybody have a

Page 34

1 BlackBerry?
2 THE WITNESS: I have one.
3 MR. MALONEY: I think we're fine now.
4 BY MR. MALONEY:
5 **Q Did she ever at any time express to you any**
6 **dissatisfaction with the current or previous Board of**
7 **Trustees?**
8 A She never mentioned to me anything about a
9 current or a previous Board of Trustees.
10 **Q Other than saying that she needed you to**
11 **provide assistance on the governing body, did she**
12 **ever tell you why she wanted you to do it or what**
13 **specifically she wanted you to do on the board?**
14 A Well, I was a Vice -- she made me Vice
15 President of the board to kind of be second to her,
16 just to insure that -- what she said, to insure that
17 her babies' money would be there at the church.
18 **Q And who was her baby?**
19 A She was talking about her children, you
20 know, like the parishioners.
21 **Q Uh-huh. So she wanted you to protect to**
22 **insure that her babies' or parishioners' money would**

Page 35

1 **be there?**
2 A Yes.
3 **Q Did she tell you anything about having any**
4 **concern about the money of the church?**
5 **Did she ever express that to you?**
6 A Yes, she did.
7 **Q What did she say?**
8 A She made a statement. She said she didn't
9 want Joe's wife to run through the money.
10 **Q Whose wife?**
11 A Joey's.
12 **Q Uh-huh. And who is Joey?**
13 A Elder Joel.
14 **Q Uh-huh. Elder Joel.**
15 A But we call him Joey.
16 **Q Joey.**
17 A Uh-huh.
18 **Q So you've known elder Joel Peebles, Sr., as**
19 **Joey; is that correct?**
20 A Yes, uh-huh.
21 **Q And she made the statement to you that she**
22 **did not want Joey's wife to run through the money?**

Page 36

1 A That's what she said to me, yes.
2 **Q And when did she say that?**
3 A I believe it was that afternoon afterwards,
4 we talked, you know, via the phone.
5 **Q And did she explain why that was a concern**
6 **to her?**
7 A I'm trying to remember exact what was said.
8 It's been so long ago, I remember that.
9 And she talked about, you know, how she, you
10 know, kept close tie -- hand on the money and not
11 allow it to be spent unnecessarily.
12 And she wanted to continue, you know, to
13 insure that her children's money not spent
14 unnecessarily.
15 And she did share with me about her
16 childhood family's house, that -- that it was, you
17 know, in debt and didn't know whether or not it was
18 going to be foreclosed on, and she was very much
19 concerned about that.
20 And she even said to me, "I wonder should I
21 pay for it" -- you know, go ahead and pay, you know,
22 the amount owed, because she wanted to keep that

Page 37

1 house in the family.
2 So she shared that with me.
3 **Q Is this the house on 1600 Jonquel Street or**
4 **another house?**
5 A This house is in the southwest.
6 **Q Okay. This piece of paper that you were**
7 **asked to sign by Apostle Peebles that day in March of**
8 **2009, what was it?**
9 A It was a document appointing me to the
10 board.
11 **Q Uh-huh. And who signed that document?**
12 A I signed and I assumed the other members
13 signed, because it had lines on it for signatures.
14 **Q So there was your signature and other**
15 **members who were being appointed, their signatures,**
16 **as well?**
17 A That's correct.
18 **Q When you saw the document, was there anyone**
19 **else's signatures already on it or was yours the**
20 **first one?**
21 A Mine was not the first one, but I couldn't
22 tell you now whose was already there.

Page 38

1 **Q Uh-huh. And so you just -- and you signed**
2 **it right there; is that correct?**
3 A That's correct.
4 **Q All right. Was there ever, to your**
5 **knowledge, a meeting of the Board of Trustees to**
6 **appoint you as a trustee?**
7 A I can't answer. I don't know.
8 **Q Are you aware of such a meeting ever being**
9 **called?**
10 A I'm not aware.
11 **Q And with respect to your appointment as a**
12 **member of the Board of Trustees, was there ever a**
13 **meeting of the Board of Trustees ever called after**
14 **you were appointed -- after you signed that document**
15 **that purported to put you on the board?**
16 A Now, you said "purported."
17 **Q Let me rephrase the question --**
18 A Okay.
19 **Q -- so it's clear.**
20 A All right.
21 **Q There came a time in March of 2009 that you**
22 **signed a document that you understood was going to**

Page 39

1 **put you on the Board of Trustees; correct?**
2 A Uh-huh.
3 **Q All right. After that occurred, did the**
4 **Board of Trustees ever have any meetings?**
5 A We had telephonic meetings because we were
6 working on the bylaws.
7 **Q Uh-huh. And who participated in those**
8 **meetings?**
9 A The Apostle, Denise Killen, Clifford
10 Boswell, Clarence Jackson and Dorothy Jackson -- I
11 mean, Dr. Williams --
12 **Q This meeting that you had --**
13 A -- and myself.
14 **Q Go ahead, finish your answer.**
15 A And myself.
16 **Q This meeting that you had on March 15th of**
17 **2009 with Apostle Peebles, that itself was not a**
18 **meeting of the Board of Trustees, was it?**
19 A On December -- excuse me?
20 **Q When you went to see Apostle Peebles on**
21 **March of 2009 when you were called to see her --**
22 A Uh-huh.

Page 40

1 **Q -- and went back there, that meeting, just**
2 **you and her and whoever else was there, that was not**
3 **a meeting of the Board of Trustees, was it?**
4 A That wasn't a meeting of the Board of
5 Trustees, no. That was to --
6 **Q Yeah. What was done to provide -- what was**
7 **done with the old Board of Trustees that was in**
8 **office at that time?**
9 A I can't answer that. I don't know.
10 **Q Who were the trustees who were in office at**
11 **that time when you signed that document?**
12 A I don't know.
13 **Q Was Joel Peebles, Sr., one of those**
14 **trustees?**
15 A I don't know.
16 **Q Do you have any reason to believe that Joel**
17 **Peebles, Sr., was not a member of the trustees at the**
18 **time that you signed that document making you a**
19 **trustee?**
20 A I haven't seen anything with Joel's name on
21 it.
22 **Q Do you have any idea as to who was or was**

Page 41

1 **not a member of the Board of Trustees prior to you**
2 **becoming a trustee?**
3 A No, I do not.
4 **Q Was there ever any action taken to remove**
5 **Joel Peebles from the Board of Trustees that you're**
6 **aware of?**
7 A I'm not aware.
8 MR. MARKS: Let me object to that
9 question.
10 You may answer.
11 BY MR. MALONEY:
12 **Q Was there ever any notice given to Joel**
13 **Peebles, Sr., that you're aware of that new trustees**
14 **were being appointed?**
15 MR. MARKS: Well, object, but you may
16 answer the question.
17 A I'm not aware of any.
18 BY MR. MALONEY:
19 **Q Were you aware of any meeting called to**
20 **formalize and adopt the appointment of new trustees?**
21 A It was a meeting that -- well, I -- I assume
22 it was a meeting where everybody came in, you know,

Page 42	Page 44
<p>1 and met individually, or everybody was in that</p> <p>2 same -- in her office.</p> <p>3 I guess that was somewhat of a meeting then,</p> <p>4 wasn't it?</p> <p>5 Q Well, as far as you know then --</p> <p>6 A Uh-huh.</p> <p>7 Q -- the way the trustee appointments were</p> <p>8 formalized was other individuals came to the office</p> <p>9 at a different time, just like you did; is that</p> <p>10 correct?</p> <p>11 A I don't know about a different time. I can</p> <p>12 only speak on when I came in there.</p> <p>13 Q Well, when you were in there, there were --</p> <p>14 you were the only person signing the document making</p> <p>15 you a trustee; correct?</p> <p>16 A Others were there. I just cannot remember</p> <p>17 everybody who was there.</p> <p>18 Q All right. Well, you've told us the others</p> <p>19 who were there at that time; correct?</p> <p>20 A Uh-huh.</p> <p>21 Q But, in fact, there were a whole group of</p> <p>22 individuals who were named as trustees in March of</p>	<p>1 A I don't recall.</p> <p>2 Q Was Deacon Dorothy Williams in the room?</p> <p>3 A I don't recall.</p> <p>4 Q Do you recall there ever being a meeting of</p> <p>5 the former Board of Trustees that involved any of the</p> <p>6 following: William Meadows, Anne Wesley or Dorothy</p> <p>7 Williams, in which you were appointed to the Board of</p> <p>8 Trustees?</p> <p>9 A Repeat that, please.</p> <p>10 Q Are you ever aware of a meeting of the Board</p> <p>11 of Trustees -- the former Board of Trustees or any</p> <p>12 version of it in which either William Meadows, Anne</p> <p>13 Wesley or Dorothy Williams was present?</p> <p>14 A I'm not aware of any.</p> <p>15 Q How about any meeting in which Joel Peebles,</p> <p>16 Sr., was present?</p> <p>17 A I'm not aware.</p> <p>18 Q Are you aware of any minutes being taken of</p> <p>19 any meeting in March of 2009 to -- of any meeting in</p> <p>20 which trustees, yourself or any others were appointed</p> <p>21 at that time?</p> <p>22 A I'm not aware of minutes, uh-huh.</p>
Page 43	Page 45
<p>1 2009, including Dorothy Williams, Denise Killen,</p> <p>2 Clarence Jackson, Jennie Jackson, Bruce Landsdowne,</p> <p>3 Norma Lewis, LaShonda Terrell and the Apostle</p> <p>4 herself; is that correct?</p> <p>5 MR. MARKS: Object. Tim, I wanted you</p> <p>6 to finish your question, but I object to your</p> <p>7 characterization, because it misstates the testimony.</p> <p>8 She did not state all the individuals</p> <p>9 in the room as you just characterized in your</p> <p>10 question.</p> <p>11 MR. MALONEY: Well, no, this is not a</p> <p>12 trick question, and I'm not suggesting they were in</p> <p>13 the room. In fact, I'm suggesting the opposite --</p> <p>14 that they were not in the room, okay?</p> <p>15 BY MR. MALONEY:</p> <p>16 Q And you don't have recollection of most of</p> <p>17 those individuals being in the room; is that correct?</p> <p>18 A No, I don't.</p> <p>19 Q All right. How about when you went in the</p> <p>20 room; was Deacon Anne Wesley in the room?</p> <p>21 A I don't recall.</p> <p>22 Q Was Elder William Meadows in the room?</p>	<p>1 Q Are you aware of any minutes being proposed,</p> <p>2 ratified or adopted for the appointment in the Board</p> <p>3 of Trustees in March of 2009?</p> <p>4 A I'm not aware of any minutes.</p> <p>5 Q I would like you to explain why your</p> <p>6 appointment as a member of the Board of Trustees --</p> <p>7 your appointment and others -- was not made public to</p> <p>8 the church community until the fall of 2009?</p> <p>9 MR. MARKS: I object to the question.</p> <p>10 It presumes facts that are not put forth, but you may</p> <p>11 answer the question.</p> <p>12 MR. MALONEY: Go ahead.</p> <p>13 A I really cannot tell you why. The Apostle</p> <p>14 was my leader. I can't tell you why that it was not</p> <p>15 put forth.</p> <p>16 BY MR. MALONEY:</p> <p>17 Q Did anyone explain to the Apostle or anyone</p> <p>18 else explain to you why -- why your appointment and</p> <p>19 that of the other trustees would remain secret until</p> <p>20 the fall?</p> <p>21 MR. MARKS: Objection to the</p> <p>22 characterization as "secret." That's a presumption.</p>

Page 46

1 There was no evidence to indicate that it was ever
 2 secret.
 3 MR. MALONEY: Go ahead.
 4 MR. MARKS: You can answer if you can.
 5 A You asked did anyone ask me to -- would you
 6 please repeat the question?
 7 MR. MALONEY: Madam reporter, could you
 8 read the question back for the witness.
 9 (Record read.)
 10 A No one explained anything to me of that
 11 nature.
 12 BY MR. MALONEY:
 13 **Q Did there come a time in the fall when your**
 14 **appointment and that of others was, in fact, made**
 15 **known to the church community?**
 16 MR. MARKS: Let me object to the
 17 question.
 18 That, too, makes a presumption, but you
 19 may answer the question if you know.
 20 A I'm not aware of it being made to the
 21 church. I'm aware of it being made to Joey and Elder
 22 Meadows.

Page 47

1 BY MR. MALONEY:
 2 **Q And was that in the fall of 2009?**
 3 A I think it was.
 4 **Q How was it made aware to them at that point?**
 5 A I believe it was at a board meeting for the
 6 residences.
 7 MR. MARKS: Don't guess.
 8 BY MR. MALONEY:
 9 **Q Just tell us your recollection.**
 10 A That's my recollection.
 11 **Q And were you present at that meeting?**
 12 A I was at that meeting, yes.
 13 **Q And for the record, what is the residences**
 14 **board?**
 15 A Jericho Residences, it's a facility for
 16 over-55 adults.
 17 **Q Uh-huh. And who is -- who is on that board?**
 18 A Joey, Bobby -- Bobby Henry -- Clarence
 19 Jackson, Dorothy Williams, Joy Bell, Robert
 20 George -- I'm looking at -- I can't recall the name
 21 for nothing right now -- Trinella -- and I don't know
 22 his last name, Doug Kwiditt. One name escapes

Page 48

1 me -- and myself.
 2 **Q And how was it at that meeting that**
 3 **Joey -- Joel Peebles, Sr. -- was advised that there**
 4 **was a new Board of Trustees?**
 5 MR. MARKS: Objection to the
 6 characterization of the "new Board of Trustees," but
 7 you may answer if you know.
 8 A I didn't know it was a board. When you say
 9 "new" to me --
 10 BY MR. MALONEY:
 11 **Q Well, what was it that he was told about the**
 12 **trustees --**
 13 A Okay.
 14 **Q -- and how was he told?**
 15 A I think it just kind of came out that night.
 16 We had some documentation that needed to be signed,
 17 and I said, "Well, I will sign it as the Vice
 18 President of the Trustee Board," and that's when Joey
 19 said, "Nope," and that was it.
 20 We talked a little bit after that meeting,
 21 Joey and I, and that's when he told me that he was on
 22 the board, because I never knew he was on the board.

Page 49

1 **Q Did he appear surprised that you were**
 2 **claiming to be on the board?**
 3 A No, he --
 4 MR. MARKS: Objection. You may answer
 5 if you know.
 6 A I didn't -- he did not appear to me that he
 7 was surprised, no.
 8 BY MR. MALONEY:
 9 **Q Prior to that conversation, had you ever**
 10 **told anyone that you were either the vice chairman of**
 11 **the trustees or even a member of the Board of**
 12 **Trustees prior to that conversation?**
 13 A No I had not.
 14 **Q And why had you done from March of 2009**
 15 **until the fall without telling anyone that you were a**
 16 **trustee or a vice chairman of the trustees?**
 17 A I didn't know I had to make it public.
 18 **Q As far as you know, did any other members of**
 19 **the trustees who were supposedly appointed in March**
 20 **of 2009 -- did any of those ever make it public that**
 21 **they were now trustees?**
 22 A I can't answer for them.

Page 50

1 **Q Are you aware of any of them doing that?**
 2 A No, I'm not.
 3 **Q And from the time that you were told by**
 4 **Betty Peebles that you were going to be a trustee and**
 5 **signed the document, up until the fall of 2009 with**
 6 **this conversation with Joey, did you take any action**
 7 **as a trustee or as vice chairman of the trustees**
 8 **during that period?**
 9 A No, I did not.
 10 MR. MARKS: I'm sorry, what period are
 11 you referring to?
 12 MR. MALONEY: The period from the time
 13 that she went to Betty Peebles' office and signed the
 14 document, March 15th of 2009, all the way up until
 15 the fall of 2009 at the residence board when she told
 16 Joey that she would sign as vice chairman.
 17 BY MR. MALONEY:
 18 **Q My question is: During that period of**
 19 **time -- that five or six months -- did you take any**
 20 **action, either as a trustee or as vice chairman of**
 21 **the board?**
 22 A I don't recall.

Page 51

1 **Q Is your answer no, that you did not?**
 2 A No, I don't recall, uh-huh.
 3 **Q During that period of time from March 15th**
 4 **of 2009 up until that conversation at the residence**
 5 **board, did the board ever meet other than the**
 6 **telephone calls you've told us about to deal with the**
 7 **bylaws?**
 8 A Not to my knowledge.
 9 **Q Did the board ever take any action as a**
 10 **board that you are aware of from the time you went to**
 11 **Betty Peebles' office on March 15th of 2009 up until**
 12 **the time that you had this conversation in the fall**
 13 **at the residence board?**
 14 A Not to my knowledge.
 15 **Q How did it come to be that you were elected**
 16 **vice chairman?**
 17 **Did the board ever meet and have an election**
 18 **to make you the vice chairman?**
 19 A Not to my knowledge.
 20 **Q Do you know what the responsibilities are as**
 21 **a vice chairman?**
 22 A I'm learning.

Page 52

1 **Q Uh-huh. And what are you learning?**
 2 A What the responsibilities are, uh-huh.
 3 **Q And what are they, to the best of your**
 4 **knowledge today?**
 5 A It's to be -- it's to be responsible for the
 6 money, land, persons and land or anything of that
 7 nature, and somewhat, to, I guess, set the direction
 8 of the church.
 9 **Q There were a series of resignations from the**
 10 **board in -- following March 15th of 2009, on or about**
 11 **May 27th of 2009, based upon there being more**
 12 **trustees than the limit in the bylaws, and I'm**
 13 **referring to Jennie Jackson, Bruce Landsdowne, Norma**
 14 **Lewis, Dorothy Williams.**
 15 **Do you know anything about those**
 16 **resignations?**
 17 A I know that they -- I resigned, but I'm not
 18 sure. I don't recall -- let me say that -- as to
 19 why.
 20 **Q Who was the chairperson of the board at the**
 21 **time that you believed you became a board member in**
 22 **March 15th of 2009?**

Page 53

1 A The Apostle.
 2 **Q And upon her death, who became the**
 3 **chairperson?**
 4 A I am.
 5 **Q And how is it that you became the**
 6 **chairperson of the board upon the death of Betty**
 7 **Peebles?**
 8 A I was voted in.
 9 **Q Was there a meeting?**
 10 A Yes, it was.
 11 **Q And when was that?**
 12 A I don't recall the date.
 13 **Q Uh-huh. How long after her death did the**
 14 **meeting take place?**
 15 A I don't recall that either.
 16 **Q Was a notice provided for that meeting?**
 17 A To the board members, yes.
 18 **Q And who provided that notice?**
 19 A Denise Killen.
 20 **Q Uh-huh. Was that a written notice?**
 21 A I can't remember whether it was telephonic
 22 or written.

Page 54

1 **Q Do you have any knowledge that, in fact, a**
 2 **written notice was given at the meeting to elect you**
 3 **as chairwoman in place of Betty Peebles?**
 4 A Please ask that again, please.
 5 **Q Do you have any knowledge that, in fact, a**
 6 **written notice was given to call the meeting to elect**
 7 **you as chair in place of the late Betty Peebles?**
 8 A Yes. There was a meeting called. I don't
 9 remember whether it was written or telephonic.
 10 **Q All right. So you have no knowledge one way**
 11 **or the other?**
 12 A No, I don't.
 13 **Q Where was that meeting -- where did that**
 14 **meeting take place?**
 15 A At the Administration Building.
 16 **Q And how long before the meeting actually**
 17 **occurred was the meeting -- was notice given?**
 18 A I would -- it could have been three to five
 19 days.
 20 MR. MARKS: Don't guess.
 21 THE WITNESS: Okay. I'm not sure how
 22 long.

Page 55

1 BY MR. MALONEY:
 2 **Q So you really don't know; is that correct?**
 3 A That's correct.
 4 **Q Who was present at that meeting?**
 5 A Denise Killen, Clarence Jackson, Dorothy
 6 Williams and myself.
 7 **Q And was there a replacement also selected to**
 8 **fill the late Apostle Betty Peebles' seat on the**
 9 **Board of Trustees?**
 10 MR. MARKS: Objection to the
 11 characterization, presumes facts not before this
 12 deposition, but you may answer if you know.
 13 MR. MALONEY: Well, she was a member of
 14 the Board of Trustees and she is deceased; right?
 15 Those are not in dispute, are they?
 16 THE WITNESS: No, that's not in
 17 dispute.
 18 MR. MARKS: Okay.
 19 BY MR. MALONEY:
 20 **Q Upon her death, there's a vacancy. Who**
 21 **filled her vacancy as a trustee -- not as chair, but**
 22 **as a trustee, if anyone?**

Page 56

1 A Oh, not as a chair?
 2 **Q Right.**
 3 A I'm trying to understand what you're asking.
 4 **Q No, no.**
 5 A We elected Linda Pyles to the board -- Elder
 6 Pyles -- Linda Pyles.
 7 **Q When did that take place?**
 8 A The winter of 2010.
 9 **Q So the winter of 2010, was that at a**
 10 **different meeting other than the one that Apostle**
 11 **Peebles was elected?**
 12 A I'm not understanding.
 13 **Q Was that at a different meeting other than**
 14 **the one that you were elected to become chair?**
 15 A Yes, different meeting.
 16 **Q All right. Now, Apostle Peebles died on**
 17 **October 12th of 2010; is that correct?**
 18 A Yes, uh-huh.
 19 **Q All right. So you believe the meeting to**
 20 **replace Apostle Peebles would have been shortly**
 21 **thereafter; is that correct, and to elect you as**
 22 **chair?**

Page 57

1 A To elect me as chair wasn't shortly
 2 thereafter, it was 2010. I just don't remember the
 3 dates.
 4 **Q All right. Well, I'm not asking you so much**
 5 **of the dates --**
 6 A Uh-huh.
 7 **Q -- but you were elected chair sometime after**
 8 **the death of Betty Peebles; correct?**
 9 A Yes, sometime after the death, uh-huh.
 10 **Q All right. And you were elected and your**
 11 **conversation with Joey -- Joel Peebles, Sr. -- would**
 12 **have occurred shortly before Apostle Peebles' death**
 13 **at the residence board; is that correct?**
 14 A That's correct.
 15 **Q So that would have been sometime in the fall**
 16 **of 2010 before his mother's death; is that correct?**
 17 A That's correct.
 18 **Q All right. And just so we're clear on the**
 19 **dates, you were -- you believe you joined the board**
 20 **or signed that document, at least, on March of 2009;**
 21 **correct?**
 22 A That's correct.

Page 58

1 **Q All right. So we're talking about a period**
 2 **of actually not six months, but 18 months,**
 3 **thereabouts, in which you were -- believed you served**
 4 **on the Board of Trustees; correct --**
 5 A Not --
 6 **Q -- prior to her death?**
 7 A Not believe.
 8 **Q You believe you did; is that correct?**
 9 A That I served, yes.
 10 **Q Yes.**
 11 A Uh-huh.
 12 **Q And I guess my question is -- and you told**
 13 **us that you did not make public your membership or**
 14 **vice chairmanship on the board until the residency**
 15 **board meeting.**
 16 MR. MARKS: Objection.
 17 MR. MALONEY: Let me finish, counsel.
 18 MR. MARKS: Go ahead.
 19 BY MR. MALONEY:
 20 **Q It wasn't until the residency board meeting**
 21 **that occurred in the fall of 2010?**
 22 MR. MARKS: Object. I'm sorry.

Page 59

1 BY MR. MALONEY:
 2 **Q I guess my question is: Why did you go for**
 3 **18 months without telling anyone in the church**
 4 **community you were on the board?**
 5 MR. MARKS: Objection to the
 6 characterization.
 7 There -- that was not her testimony.
 8 That's your presumption through your question, but
 9 that was not her testimony.
 10 You may answer the question.
 11 MR. MALONEY: Good.
 12 A As I said to you earlier, the Apostle was
 13 still the leadership there, and if it was to be
 14 known, I felt that she was the one that should have
 15 told the church.
 16 Now, I can't talk about anyone else. I did
 17 not make it public.
 18 BY MR. MALONEY:
 19 **Q And you're not aware of anyone else making**
 20 **it -- the new board members public in that 18 months?**
 21 A I'm not aware.
 22 **Q And are you aware of Apostle Betty Peebles**

Page 60

1 **ever making it public during that 18 months?**
 2 A I'm not aware.
 3 **Q The document that you signed in March of**
 4 **2009, who prepared it?**
 5 A It was prepared -- it was a prepared
 6 document when I got there.
 7 **Q I understand that. But my question is: Who**
 8 **prepared it?**
 9 A I can't answer that.
 10 **Q Okay. The -- during that 18 months between**
 11 **March of 2009 and the residency board meeting**
 12 **with -- where you told Joey that you were vice**
 13 **chairman, member of the trustees, do you recall any**
 14 **action that you took as vice chair as trustee?**
 15 A I can't recall.
 16 **Q Do you recall any board meetings in that 18**
 17 **months other than the phone conversations to discuss**
 18 **bylaws?**
 19 A I can't recall.
 20 **Q How many of those phone conversations were**
 21 **there?**
 22 A There was a number of them. I can't

Page 61

1 remember how many.
 2 **Q Were these formal meetings of the board that**
 3 **were subject of a meeting notice or just people**
 4 **getting on the phone?**
 5 A It was subject to a meeting notice, because
 6 I was --
 7 **Q Were there written meeting notices sent out?**
 8 A I think it was telephonic, if I remember.
 9 MR. MARKS: Don't guess.
 10 A Okay.
 11 BY MR. MALONEY:
 12 **Q The -- with respect to the Apostle's**
 13 **comments about "spending the babies' monies," had she**
 14 **made any other comments other than that that you're**
 15 **aware of about her concerns about spending in the**
 16 **church?**
 17 A She was concerned also about the academy and
 18 what transpired there.
 19 **Q Anything else?**
 20 A I think that's it -- well, all I can recall
 21 at this time.
 22 **Q And with respect to -- let's talk about the**

Page 62

1 money first.
2 Did she ever tell you specifically any
3 concerns she had about how Joel Peebles, Sr., managed
4 money?
5 A The academy, as I said before, the house,
6 and she didn't want her babies' money spent.
7 Q All right. Well, my question is a little
8 different, and my question is: What specific things
9 did she ask you or complain about or express concern
10 about relating to Joel Peebles' management of money?
11 Now, you've told us the house in the
12 southwest, the academy.
13 Anything else?
14 A Not to my knowledge.
15 Q What did she tell you about the house in the
16 southwest?
17 A She thought it was going into -- well, she
18 said it was going into foreclosure, and she said to
19 me, "I wonder should I go ahead and buy it or pay the
20 money owed?"
21 That's pretty much it.
22 Q Do you, yourself, have any personal

Page 63

1 knowledge as to whether the house was, in fact, going
2 into foreclosure?
3 A No, I do not have any personal knowledge.
4 Q Do you have any knowledge at all about
5 whether it was going into foreclosure?
6 A Just the knowledge that was given to me by
7 the Apostle.
8 Q Just what she told you in that one
9 conversation?
10 A Uh-huh.
11 Q Is that a yes? You have to give a --
12 A That's a yes.
13 Q And who was living in the house at the time
14 she made this statement, if you know?
15 A I am not sure. I don't know, actually.
16 Q Do you know the address of the house?
17 A Either 509 --
18 MR. MARKS: Don't guess.
19 A I can't remember the address.
20 BY MR. MALONEY:
21 Q And what role, if any, did Joel Peebles,
22 Sr., have with respect to the southwest house?

Page 64

1 A I don't know.
2 Q Did she pay off the house?
3 A Well, let me back up. Let me back up.
4 Q Go ahead.
5 A That house -- I was at a meeting. I was
6 called to a meeting when the pastor was -- signed
7 that house over to Elder Joel. I was at a meeting.
8 She called me to a meeting when she was signing that
9 house over to the Elder Joel.
10 Q And when did that meeting take place?
11 A Oh, my goodness. I really don't remember.
12 Q Well, how long before her death did that
13 take place?
14 A I don't remember.
15 Q Was this after she had expressed to you
16 concern about the house going into foreclosure or
17 before?
18 A It was before.
19 Q How much longer before?
20 A I don't remember.
21 Q At that meeting, did she sign over her
22 interest in the house to Joel Peebles, Sr.?

Page 65

1 A She actually gave that house to Joel,
2 uh-huh.
3 Q Do you know, are you, yourself, aware of any
4 problem with her doing that?
5 Was there anything wrong with her doing
6 that?
7 A Not to my knowledge.
8 Q And that was her personal property; correct?
9 A That was her personal property.
10 Q It was not the property of the church?
11 A Not of the church.
12 Q Do you know why you were called to the
13 meeting when the property -- the deed to the
14 southwest property was conveyed to Joel Peebles, Sr.?
15 A I was --
16 Q So you were asked to sign the deed as a
17 witness?
18 A I didn't sign, just being there.
19 Q All right. And at that time, she conveyed
20 the property to Joel so it was his; correct?
21 A That's correct.
22 Q Do you have any knowledge at all as to

<p style="text-align: right;">Page 66</p> <p>1 whether the property, once it was titled in Joel's 2 name, went into financial trouble or not? Do you 3 know about that one way or the other? 4 A Just through the Apostle, what she said to 5 me. 6 Q But you've never done anything to 7 investigate that; is that correct? 8 A No, I have not. 9 Q And you don't know the current status of the 10 property; is that correct? 11 A No, I don't. 12 Q And any of the decisions that you have made 13 at Jericho with respect to that -- to Joel Peebles, 14 Sr., I take it that property would have nothing to do 15 with it; is that correct? 16 A Absolutely nothing. 17 Q Okay. So the property is a big nonfactor, 18 is that right -- the southwest property in terms of 19 anything that's gone on at Jericho or any of the 20 decisions you were making with respect to Joel 21 Peebles, Sr.; is that correct? 22 A That's correct.</p>	<p style="text-align: right;">Page 68</p> <p>1 organization of that size, yeah. 2 That's my personal evaluation. 3 BY MR. MALONEY: 4 Q Anything else? 5 A I think the more training and mentoring, 6 those are the big pieces for me personally. 7 Q Is there anything else you feel that causes 8 you any reservations about Joel Peebles, Sr., being 9 pastor, other than what you have described as a need 10 for training and mentoring? 11 A At this time. 12 Q Is your answer "at this time," no, nothing 13 other than those two things? 14 A Training, mentoring and probably 15 organization. 16 Q All right. So those three? 17 A Yes. 18 Q Anything besides those three? 19 A Just those three, uh-huh. 20 Q And what is it about anything that Joel 21 Peebles has done or has failed to do that causes you 22 to believe that he needs more training, mentoring or</p>
<p style="text-align: right;">Page 67</p> <p>1 Q Do you know any reason why Joel Peebles, 2 Sr., should not be the pastor at Jericho? 3 MR. MARKS: Let me object to that 4 question. 5 You may answer if you know. Your 6 question presumes that he has not been -- well, I'll 7 stop there. 8 MR. MALONEY: Go ahead. 9 A I don't know -- do I have any reason, huh? 10 BY MR. MALONEY: 11 Q Yes. 12 A Ask the question again. 13 MR. MALONEY: Can you read the question 14 back, Madam reporter? 15 (Record read.) 16 MR. MARKS: And let me object and just 17 ask Mr. Maloney, are you asking her personal reason 18 or corporate reason? 19 MR. MALONEY: Either -- for any reason 20 she knows -- any at all. 21 A At this time, I think there probably should 22 be a little more training and mentoring to manage an</p>	<p style="text-align: right;">Page 69</p> <p>1 organization? 2 A The way services are conducted, some things 3 that come across the pulpit. I think that there's 4 just a little too much movement and walking up on the 5 pulpit when we're in church, so that's what I was 6 talking about organization. 7 And the services at 8:00 o'clock is 8 different from the services at 11:00 o'clock. 9 My thinking is that they probably -- two 10 services are probably too many for him to do on a 11 Sunday and probably someone else should do 11:00 12 o'clock or vice versa. 13 Q Anything else? 14 A I think -- I think that's it for now. 15 Q And when you say you're concerned about how 16 the services are conducted from the pulpit -- 17 A Uh-huh. 18 Q -- and there's too much movement -- 19 A Uh-huh. 20 Q -- what do you mean by that? 21 A Too much walking back and forth of people 22 who, I guess, aided Joel, and I think probably a</p>

Page 70	Page 72
<p>1 little bit too much playing.</p> <p>2 I don't know. It could be my age, as</p> <p>3 opposed to his age, okay? I guess when I come to</p> <p>4 church, I expect the place -- you get the place into</p> <p>5 worship -- into fellowship worship, you know. I</p> <p>6 expect for us to keep it there until the service is</p> <p>7 over.</p> <p>8 And as I say, it could -- it could be my</p> <p>9 age, as opposed to, you know, their age -- he and his</p> <p>10 wife's age.</p> <p>11 But I kind of like to kind of keep the</p> <p>12 service flowing, you know, with the Lord -- the Holy</p> <p>13 Spirit leading and guiding.</p> <p>14 Q So you want more of the Holy Spirit?</p> <p>15 A I want to keep it in that framework, you</p> <p>16 know, because I think just too much of walking back</p> <p>17 and forth.</p> <p>18 Q And when you say "too much walking back and</p> <p>19 forth," is that on the part of Joel or on the part of</p> <p>20 the people around?</p> <p>21 A It's on the part of the people who are</p> <p>22 around him.</p>	<p>1 A -- but that's my personal.</p> <p>2 Q All right. And when you say that the two</p> <p>3 services are too much for him, the 8:00 and the</p> <p>4 11:00, you're thinking he should just do one and not</p> <p>5 both; is that correct?</p> <p>6 A That's my -- that's what I'm saying. That's</p> <p>7 what I'm thinking.</p> <p>8 Q And why do you think that?</p> <p>9 A Because by the time it gets -- I'm thinking</p> <p>10 that's why some of the extra stuff comes in, because</p> <p>11 of the fact that --</p> <p>12 Q Uh-huh.</p> <p>13 A -- probably be tired from the first service,</p> <p>14 you know. It's a lot to stand up there and pull out,</p> <p>15 you know, at two services.</p> <p>16 Q Do you usually go to both the 8:00 o'clock</p> <p>17 and the 11:00 o'clock service?</p> <p>18 A I have attended the 8:00. I don't always go</p> <p>19 to the 8:00, I go to the 11:00.</p> <p>20 Q So you usually go to the 11:00 and not the</p> <p>21 8:00?</p> <p>22 A Right.</p>
Page 71	Page 73
<p>1 Q And who are those people?</p> <p>2 A I guess they are omni bearers. I'm not</p> <p>3 sure.</p> <p>4 Q If those people would stand still, would you</p> <p>5 feel better about Joel's performance?</p> <p>6 A And a little too much playing, I think,</p> <p>7 coming from Joel.</p> <p>8 Q He is a little too playful from the pulpit;</p> <p>9 is that correct?</p> <p>10 A I think. I think.</p> <p>11 Q Are these things a matter of personal</p> <p>12 preference for you really based on --</p> <p>13 A That's what you asked, my personal, and</p> <p>14 that's my personal.</p> <p>15 Q Okay. But that's not the view of the board,</p> <p>16 that's just your personal --</p> <p>17 A That's my personal.</p> <p>18 Q -- or who purports to be the board, it's</p> <p>19 your personal preference; is that right?</p> <p>20 A With the board -- that's my, you know -- I</p> <p>21 don't know about others on the board --</p> <p>22 Q All right.</p>	<p>1 Q Is it a fair statement that you sometimes</p> <p>2 have gone to the 8:00, but usually not?</p> <p>3 A Sometimes I go to the 8:00, but usually not.</p> <p>4 Usually, I go to the 11:00.</p> <p>5 Q All right. And with respect to Joel's</p> <p>6 financial management -- Joel Peebles, Sr. -- do you</p> <p>7 have any reason to question or doubt his capacity for</p> <p>8 financial management or his performance in financial</p> <p>9 management?</p> <p>10 A Well, here lately, monies are being taken up</p> <p>11 and they are not being turned over to the finance</p> <p>12 office, you know, so there's a concern about that,</p> <p>13 you know, "Like where is that money? What's going</p> <p>14 on?"</p> <p>15 Q Well, does Joel Peebles have anything to do</p> <p>16 with that?</p> <p>17 A I would have to say yes.</p> <p>18 Q How does he have anything to do with that?</p> <p>19 A Because the people who are taking the money,</p> <p>20 and when the deacons come to get it, they say, "No,</p> <p>21 we got it," you know.</p> <p>22 So that says to me that Joel has given them</p>

Page 74

1 directions on what to do, because they would not take
 2 that money unless they have gotten direction from
 3 Joel or maybe Elder Meadows. I don't know.
 4 **Q So you believe the deacons are acting in**
 5 **collecting the money on Sunday at the direction of**
 6 **either Joel Peebles, Sr., or Elder Meadows; is that**
 7 **correct?**
 8 A Not the deacons. These are not the deacons
 9 I'm talking about.
 10 **Q Who are they?**
 11 A These are the people I see with Joel.
 12 **Q And you believe that they are collecting**
 13 **money from the congregation at the direction of Joel?**
 14 A Uh-huh -- no, not collecting. Let me back
 15 up.
 16 The -- it comes from Joey, you know, to
 17 raise money, okay? These people come down and they
 18 kind of stand around. That kind of blockades the
 19 deacons from coming to get the money, you know,
 20 so -- and when people have given, the finance office,
 21 you know, doesn't get the money, and that has
 22 happened on Wednesday nights, you know, so that's

Page 75

1 my concern.
 2 THE VIDEOGRAPHER: You're covering up
 3 your microphone.
 4 A I'm sorry. That's happening on Wednesday
 5 nights, also.
 6 So that's my concern about, you know, the
 7 money and what, you know -- anything collected in
 8 Jericho should go to the finance office, you know,
 9 and even if we want to pay somebody or give somebody
 10 a benevolent offering, the procedure there is what --
 11 all monies go to the back and we write a check, you
 12 know, so we can account for all the monies that come
 13 in.
 14 BY MR. MALONEY:
 15 **Q Let me make it clear what we're talking**
 16 **about. Let's first deal with the Sunday collections.**
 17 A Uh-huh.
 18 **Q Do you -- there is a regular Sunday**
 19 **collection at both the 8:00 o'clock and the 11:00**
 20 **o'clock service; correct? Is that correct?**
 21 A That's correct, uh-huh.
 22 **Q Do you believe that Joel Peebles, Sr., in**

Page 76

1 **the last 18 months or since March of 2009 has had**
 2 **anything to do with the collection or disposition of**
 3 **those funds?**
 4 A Not the main offerings, no.
 5 **Q Okay.**
 6 A Not the main offerings on Sundays.
 7 **Q What monies other than that?**
 8 A But other monies that are raised, you know,
 9 people come up to pay -- I mean, to give offerings to
 10 the boys -- Boys Town. People come up to give, you
 11 know, benevolence for some people that might be in
 12 need.
 13 Wednesday night, the night that Joel
 14 conducts a class -- he conducts a class on Wednesday
 15 nights, and for the past two or three weeks -- maybe
 16 more -- I can't remember off the top of my
 17 head -- the money was not turned into the finance
 18 office.
 19 **Q Where did the money go?**
 20 A I have no idea.
 21 **Q Who collected the money?**
 22 A The money was -- people walk up to the front

Page 77

1 and put it in the bucket, and people who are with
 2 Joel takes the buckets.
 3 **Q Who collects the main offering on Sundays?**
 4 A The main offering, usually the deacons get
 5 the main offering.
 6 **Q And which deacons are those?**
 7 A Usually, it's Dorothy Jackson -- Deacon
 8 Dorothy Jackson, who is the finance officer, and
 9 Clarence Jackson or sometimes Boswell -- it just
 10 depends on what deacon is up front at that time.
 11 **Q And what happens to the main offerings on**
 12 **Sunday after they are collected?**
 13 A That money goes to the finance office.
 14 **Q And is it counted then?**
 15 A No, it's not counted at that time.
 16 **Q What happens then?**
 17 A That money is usually counted on Mondays and
 18 I guess finish up on Tuesday, something like that.
 19 **Q Does it remain in the church during that**
 20 **period of time?**
 21 A Yes, we have a safe.
 22 **Q Uh-huh. And what security is provided to**

Page 78

1 **protect that money?**
 2 A I don't know --
 3 MR. MARKS: Let me object to that
 4 question and I'm going to advise you not to answer,
 5 because that goes to security issues at the church.
 6 MR. MALONEY: Well, we're concerned
 7 about -- the legitimate board here is concerned about
 8 the disposition and protection of these funds.
 9 MR. MARKS: That's your
 10 characterization of a legitimate board.
 11 The funds are secured. There is an
 12 established process for that.
 13 MR. MALONEY: Are you testifying?
 14 MR. MARKS: No, I'm just telling you,
 15 I'm advising Ms. Magruder not to answer your
 16 questions regarding the security of the funds because
 17 that should not be made public.
 18 BY MR. MALONEY:
 19 **Q Well, are there any police officers who are**
 20 **involved in this in protecting the funds that are**
 21 **collected that you're aware of?**
 22 MR. MARKS: I'm going to object and

Page 79

1 advise you not to answer.
 2 BY MR. MALONEY:
 3 **Q Are the funds then deposited at the Bank of**
 4 **America?**
 5 MR. MARKS: You may answer if you know.
 6 A Yes.
 7 BY MR. MALONEY:
 8 **Q And who do you deal with at the Bank of**
 9 **America?**
 10 A I don't deal with anyone at the Bank of
 11 America. The financial officer does.
 12 **Q And who is that person?**
 13 A Deacon Dorothy Williams.
 14 **Q And do you know who she deals with at the**
 15 **bank?**
 16 A No, I do not.
 17 **Q Who are the signatories -- the signatories**
 18 **on the Jericho Bank accounts that you're aware of?**
 19 A Denise Killen and Deacon Clarence Jackson
 20 and Deacon Dorothy Williams.
 21 **Q And how did they happen to become the**
 22 **signatories on the bank account?**

Page 80

1 A Well, one, Deacon Denise Killen was on there
 2 prior to the pastor's death.
 3 **Q Uh-huh.**
 4 A We had a meeting about a month ago, and I
 5 advised that we have more than one signature person,
 6 and Deacon Dorothy Williams and Deacon
 7 Clifford -- excuse me -- Deacon Dorothy Williams and
 8 Deacon Clarence Jackson now have signature authority.
 9 **Q Was there a resolution passed giving them**
 10 **signature authority?**
 11 A There is a resolution, or I'm almost sure
 12 that we did a resolution. I cannot be --
 13 **Q Was there a notice given of this meeting to**
 14 **adopt new signature authority for the bank account?**
 15 A Yes, there was a notice given.
 16 **Q And who gave that notice?**
 17 A I did.
 18 **Q And why did you decide to add two additional**
 19 **signatories to the account?**
 20 A I think just for protection and, you know,
 21 of -- you know, personal liability, and everywhere I
 22 have been, that has been the procedure.

Page 81

1 **Q The monthly collections, are they still**
 2 **averaging in excess of \$30,000 at the Jericho church?**
 3 A I do not know.
 4 **Q What do you think the monthly collections**
 5 **are?**
 6 MR. MARKS: Don't guess.
 7 A I do not know.
 8 BY MR. MALONEY:
 9 **Q The weekly collections -- do you have any**
 10 **idea what the weekly collections are for the Sunday**
 11 **offerings at Jericho?**
 12 A I do not know.
 13 **Q As the Chairman of the Board, you don't have**
 14 **any idea what the weekly offerings are?**
 15 A I don't know.
 16 **Q Have the weekly offerings gone up or down or**
 17 **remained the same since the death of the Apostle**
 18 **Betty Peebles?**
 19 A Now, it has -- I know it's said in the
 20 meetings that it has gone down.
 21 **Q Uh-huh.**
 22 A But I never get the amount it has gone down.

Page 82

1 **Q And how come you as the Chairman of the**
2 **Board do not get the amount that the collections have**
3 **gone down?**
4 A I guess we come to the meetings, that
5 information is not available at that time.
6 **Q Well, is it ever available?**
7 A It hasn't been, not up to this time.
8 **Q And why hasn't the weekly collection**
9 **information been available to you as the board chair**
10 **up to this time?**
11 A As I said, when we come to meetings, it
12 wasn't prepared at the time or something like that.
13 **Q Well --**
14 A But we are working on a procedure, so --
15 **Q And what procedure are you working on?**
16 A On getting a report on a biweekly basis.
17 **Q And why is this taking so long?**
18 A Well, I just met with everyone maybe about
19 three or four weeks ago.
20 **Q Well, since you supposedly joined the board**
21 **in March of 2009, have you ever seen any financial**
22 **reports of any kind -- and I'm referring to reports**

Page 83

1 **that would show the financial performance of the**
2 **church or any of the offerings on a weekly, monthly,**
3 **annual or other basis?**
4 **Have you seen any financial reports of any**
5 **kind?**
6 A I have seen a quarterly report. I have seen
7 a quarterly report.
8 **Q And when did you see that?**
9 A December/January time frame.
10 **Q And December or January of what year?**
11 A 2010/2011 -- I'm not sure what month,
12 whether it was December or January.
13 **Q So that would have been around the beginning**
14 **of this current year that we're in or the year**
15 **before?**
16 A It was probably the -- for the third quarter
17 of 2010.
18 **Q All right. So that would have been the**
19 **period from July the 1st to September the 30th of**
20 **2010?**
21 A Somewhere around that time.
22 **Q And who prepared that report?**

Page 84

1 A That was prepared by Mr. Scafford Forte.
2 **Q And who is he?**
3 A He is the accountant for the church.
4 **Q And what firm is he with?**
5 A I don't think he is with a firm. I think he
6 is just an individual.
7 **Q Is he, in fact, a Certified Public**
8 **Accountant?**
9 A Yes, he is.
10 **Q Uh-huh. And how did Scafford Forte come to**
11 **be the account for the church?**
12 A I don't know. I don't know.
13 **Q Well, did the board select him?**
14 A He was there when I --
15 **Q The current board?**
16 A He was there --
17 **Q Go ahead.**
18 A -- when I came on board.
19 **Q Other than the report for the third quarter**
20 **of calendar year 2010, have you at any time since**
21 **March of 2009 seen any other financial reports for**
22 **the church?**

Page 85

1 A No, I haven't.
2 **Q Have you seen any tax returns for the church**
3 **or for the church corporation?**
4 A No, I haven't.
5 **Q Has the church corporation, Jericho Baptist**
6 **Church Ministries, or Jericho Baptist Church,**
7 **Incorporated, filed its 990-T tax returns?**
8 A Yes, they have.
9 **Q When did they file those?**
10 MR. MARKS: Let me object to the
11 question.
12 That presumes that a 990 has to be
13 filed for the church.
14 MR. MALONEY: Well, it's a nonprofit.
15 It's got its 501(C)(3). If it's going to maintain
16 that, it has to file a 990-T.
17 Has that been filed?
18 MR. MARKS: I object to the presumption
19 that's made through the question, but you may ask --
20 answer if you know.
21 A I was told that it was being filed, so --
22 BY MR. MALONEY:

Page 86

1 **Q And who told you that it was being filed?**
2 A Deacon Denise Killen.
3 **Q And what is her job?**
4 A Her job is the COO.
5 **Q Have you ever signed any tax returns?**
6 A I have not.
7 **Q All right. So you have no personal**
8 **knowledge?**
9 A I have no personal knowledge.
10 **Q So whether the tax returns have been filed**
11 **or not, you don't know; is that correct?**
12 A That's correct.
13 **Q Has the board, to your knowledge, taken any**
14 **action since March of 2009 to insure that timely tax**
15 **returns have been filed?**
16 MR. MARKS: Objection to the question.
17 It makes a presumption that it's the board's
18 responsibility, but you may answer if you know.
19 MR. MALONEY: Of course, it's the
20 board's responsibility.
21 Go ahead. You may answer.
22 A No, we have not.

Page 87

1 BY MR. MALONEY:
2 **Q You and -- is there anything that's**
3 **prevented the board from insuring that timely tax**
4 **returns be filed in this case?**
5 MR. MARKS: Objection to the
6 characterization of the question, but you may answer
7 if you know.
8 A Not to my knowledge.
9 BY MR. MALONEY:
10 **Q Has the board -- have any annual reports**
11 **been filed in association with the church's 501(C)(3)**
12 **and (4) designation that you're aware of?**
13 A I was told that it was being done, but I'm
14 not personally aware.
15 **Q And who told you that they were being**
16 **prepared?**
17 A Denise Killen.
18 **Q And what did she tell you?**
19 A That she had a report that needed to be
20 filed to go to the state, I think.
21 **Q And has the board taken any action to insure**
22 **that there are timely filings associated with its**

Page 88

1 **501(C) status?**
2 A No, we have not.
3 **Q Is there anything preventing the board from**
4 **doing so?**
5 A No, there isn't.
6 **Q And with respect to the financial reports,**
7 **is there any reason why the board has not been**
8 **provided any weekly, monthly, quarterly or annual**
9 **financial statements other than the Financial**
10 **Statement for the third quarter of 2010?**
11 MR. MARKS: Objection to the
12 characterization.
13 The testimony has been that
14 Ms. Magruder has not received a financial report.
15 MR. MALONEY: She is Chairman of the
16 Board.
17 MR. MARKS: Not that the board has not
18 received.
19 BY MR. MALONEY:
20 **Q I'll ask her that. Has the board, to your**
21 **knowledge, under your chairmanship received any**
22 **financial reports concerning the operation of the**

Page 89

1 **church other than the report for the third quarter of**
2 **calendar year 2010?**
3 A Not to my knowledge.
4 **Q Do you know any reason why those financial**
5 **reports have not been forthcoming to the board?**
6 A No, I do not.
7 **Q Is there anything that is preventing the**
8 **board from obtaining those financial reports?**
9 A Not to my knowledge.
10 **Q Whose responsibility on the staff is it to**
11 **prepare the -- or among your accountants or**
12 **contractors is it to prepare the financial reports?**
13 A It's the Chief Financial Officer.
14 **Q Would that be Ms. Killen?**
15 A Deacon Dorothy Williams.
16 **Q Deacon Williams?**
17 A Uh-huh.
18 **Q Have you had discussions -- you or the board**
19 **collectively -- with Ms. Williams on where those**
20 **financial reports are?**
21 A We have talked about it; yes, we have.
22 **Q And what explanation has she given you?**

Page 90

1 MR. MARKS: Objection. It makes
 2 presumptions that have no factual basis.
 3 You may answer.
 4 MR. MALONEY: I'll rephrase the
 5 question.
 6 BY MR. MALONEY:
 7 **Q Has she given you any explanation at all as**
 8 **to why these financial reports have not been**
 9 **forthcoming?**
 10 MR. MARKS: Objection. Still, it still
 11 presumes facts for which there's no factual basis,
 12 but you may answer, if you know.
 13 MR. MALONEY: Go ahead.
 14 A Not to my knowledge. I just don't know.
 15 BY MR. MALONEY:
 16 **Q Are you concerned as Chairman of the Board**
 17 **that you have not received any financial reports at**
 18 **all other than for the third quarter of 2010?**
 19 A As I said, we are working through that right
 20 now, you know, coming up with procedures.
 21 **Q Well, what has prevented -- if you know,**
 22 **what has prevented the financial reports from being**

Page 91

1 **prepared and circulated to date?**
 2 A I don't know.
 3 **Q And when you say it's Dorothy Williams'**
 4 **responsibility as Chief Financial Officer, how long**
 5 **has she been the Chief Financial Officer?**
 6 A Deacon Dorothy has been there for years. I
 7 don't know exactly how long.
 8 **Q Uh-huh. And is she also a member of the**
 9 **Board of Trustees?**
 10 A Yes, she is.
 11 **Q Has there ever been a conflict waiver or**
 12 **other decision made or discussion with the board**
 13 **about her holding both the role of Chief Financial**
 14 **Officer and a member of the Board of Trustees?**
 15 A There has not been any conflict raised.
 16 **Q Is she compensated as the Chief Financial**
 17 **Officer? Does she get a salary?**
 18 A Oh, yes, she is on salary at the church.
 19 **Q What is that salary?**
 20 A I have no idea.
 21 **Q As the Chairman of the Board, you have no**
 22 **idea what the salary of the Chief Financial Officer**

Page 92

1 **is?**
 2 A No, I do not have any idea.
 3 **Q Does the board set her salary?**
 4 A Well, this board has not.
 5 **Q So since?**
 6 A I'm thinking that it was set before we came,
 7 you know, together.
 8 **Q So since March of 2009, have you as a board**
 9 **done anything to review what Ms. Williams' salary is?**
 10 A No, we have not.
 11 **Q Do you have any idea -- you, yourself -- as**
 12 **Chairman of the Board as to what salary she is being**
 13 **paid?**
 14 A No, I do not.
 15 **Q Has Ms. Williams basically decided for**
 16 **herself what she gets paid as Chief Financial**
 17 **Officer?**
 18 A I have no knowledge of that, but I doubt
 19 that. I'm almost sure it was set by the Apostle.
 20 **Q Well, the Apostle is deceased; correct?**
 21 A Well, now, but she has been working in that
 22 office a long time prior to her passing.

Page 93

1 **Q And since the Apostle passed, has -- what,**
 2 **if anything, has the board done to review**
 3 **Ms. Williams' salary?**
 4 A There have not been anything done.
 5 **Q How about Ms. Williams' performance as Chief**
 6 **Financial Officer; what, if anything, has the board**
 7 **done to review her performance as the Chief Financial**
 8 **Officer?**
 9 A Nothing to date.
 10 **Q Is there any evaluation procedure in place**
 11 **to assess her role as Chief Financial Officer in**
 12 **light of the fact that none of these reports have**
 13 **been forthcoming?**
 14 A Not at this time.
 15 **Q Has Miss Williams ever been asked to excuse**
 16 **herself from any board meetings so that her**
 17 **performance of Chief Financial Officer could be**
 18 **reviewed?**
 19 MR. MARKS: Let me object to that
 20 question, because again, it presumes facts that are
 21 not -- for which there -- no basis has been provided,
 22 but you may answer if you know.

Page 94

1 MR. MALONEY: Go ahead.
 2 A Keep in mind, sir, that we just came
 3 together to start functioning as a board after the
 4 passing, you know, and we are trying to pull things
 5 together, you know, after the passing of the Apostle,
 6 because the Apostle had hands, you know -- hands on
 7 everything else prior, so now we are just coming
 8 together and we're organizing it and working on
 9 different issues.
 10 BY MR. MALONEY:
 11 Q Has there ever been an audit of the books
 12 and records of the Jericho Baptist Church Ministries,
 13 Incorporated, that you're aware of?
 14 A Yes, I am aware that we have audits, uh-huh.
 15 Q When was the last audit that was conducted
 16 of the Jericho Baptist Church records that you're
 17 aware of?
 18 A The last one, I'm not sure.
 19 Q Has there been an audit commissioned or
 20 contracted for since you joined the board on March of
 21 2009?
 22 A To my knowledge, what I have been told, that

Page 95

1 they do quarterly audits and then they do one
 2 annually, but I have not seen it.
 3 Q And who told you that?
 4 A That came from Deacon Dorothy Williams.
 5 Q And who is "they" that performs the audit?
 6 A Scaffold Forte.
 7 Q And has the board ever been provided with a
 8 copy of these quarterly or annual audits that Dorothy
 9 Williams has told you about?
 10 A I have not.
 11 Q Have you as the board chair ever asked for
 12 copies of these audits?
 13 A No, I haven't.
 14 Q Has the board collectively ever asked for
 15 copies of these audits?
 16 A Not to my knowledge.
 17 Q Is there anything that has prevented the
 18 board from asking for these audits?
 19 A Not to my knowledge.
 20 Q What, if anything, has the board done to
 21 insure the integrity of the financial system at
 22 Jericho Baptist Church?

Page 96

1 A Get additional signatures on the check -- on
 2 the signing of checks at this time.
 3 Q Anything else?
 4 A Not at this time.
 5 Q When you say "additional signatures," are
 6 they required counter-signatures so that you have to
 7 have more than one signature or can any of the three
 8 sign?
 9 A Basically, the signature -- the signers
 10 would be Denise Williams -- I mean, Denise Killen and
 11 Dorothy Williams, but if one should not be present,
 12 then Clarence Jackson.
 13 Q Well, my question is: Are two signatures
 14 required now or could any one of the
 15 three -- Williams, Killen or Jackson -- sign checks?
 16 A We would like to have at least two.
 17 Q Well, when you say, "we would like to have
 18 at least two" --
 19 A Uh-huh.
 20 Q -- is there a requirement as part of your
 21 board resolution to the Bank of America that there be
 22 at least two or is that just something that you would

Page 97

1 prefer?
 2 A Would prefer.
 3 MR. MARKS: Is this a good time to take
 4 a break?
 5 MR. MALONEY: Sure.
 6 THE VIDEOGRAPHER: This marks the end
 7 of Volume 1, Tape Number 1, in the deposition of
 8 Gloria McClam-Magruder.
 9 Going off the record. The time is
 10 11:45 a.m.
 11 (Whereupon, a recess was held from
 12 11:45 a.m. to 12:10 p.m.)
 13 THE VIDEOGRAPHER: Back on the record.
 14 Here marks the beginning of Volume 1, Tape Number 2,
 15 in the deposition of Gloria McClam-Magruder.
 16 The time is 12:10 p.m.
 17 BY MR. MALONEY:
 18 Q Who do you believe the current members of
 19 the Board of Trustees to be?
 20 A I know that the current members of the board
 21 are Denise Killen, Clifford Boswell, Clarence
 22 Jackson, Dorothy Williams, Linda Pyles and myself.

Page 98

1 **Q And who are the -- and you believe yourself**
2 **to be chair; is that correct?**
3 A Yes.
4 **Q And who do you believe the other officers to**
5 **be?**
6 A Linda Pyles is the Assistant Chair.
7 **Q And is Ms. Killen the Secretary?**
8 A Yes, uh-huh.
9 **Q And is Ms. Williams the Chief Financial**
10 **Officer?**
11 A Yes.
12 **Q And does anyone else hold any office other**
13 **than trustee?**
14 A We have Assistant Secretary, Clifford
15 Boswell.
16 **Q And you've already told us about the stipend**
17 **you received and the compensation Ms. Williams**
18 **receives.**
19 A Not compensation, she is salaried, because
20 she works at the church.
21 **Q Well, that's compensation.**
22 A That's true, but --

Page 99

1 **Q Okay. Other than the stipend you previously**
2 **received and the compensation Ms. Williams continues**
3 **to receive, do or have any members of the**
4 **trustees -- the individuals you just named that you**
5 **believe to be trustees -- do any of them -- have they**
6 **or do they receive any form of compensation, salary,**
7 **reimbursement, expenses or anything else?**
8 A Salaries, Denise Killen and Clarence
9 Jackson.
10 **Q Uh-huh. Anyone else?**
11 A Not to my knowledge.
12 **Q Does anyone else receive any form of expense**
13 **reimbursement or stipend or mileage or any kind of**
14 **monetary allotment or payment?**
15 **Do they get any kind of payments of any**
16 **kind?**
17 A Not to my knowledge.
18 **Q And let's break them down. Clarence**
19 **Jackson, what compensation does he receive?**
20 A I'm not aware of -- of just what -- how
21 much.
22 **Q Well, does he have a job with the church?**

Page 100

1 A Yes, he is employed by the church.
2 **Q And what's his job?**
3 A Facilities manager.
4 **Q And how long has he had that position?**
5 A I'm not aware of how long.
6 **Q Did he have that position in March of 2009**
7 **when you believe you joined the trustees?**
8 A When I joined?
9 **Q Yes.**
10 A Yes.
11 **Q All right. And has his salary been set by**
12 **the board?**
13 A I'm not aware of that.
14 **Q Well, who sets Clarence Jackson's salary?**
15 A It was set prior to my coming on the board.
16 **Q Has the board reviewed his salary at all?**
17 A Not to my knowledge.
18 **Q Mr. Jackson, how long has he been an**
19 **employee of Jericho?**
20 A I'm not aware of that.
21 **Q All right. Did he begin his career at**
22 **Jericho as the custodian?**

Page 101

1 A I'm not aware of that.
2 **Q Do you know anything about his career?**
3 A I know now he is a facilities manager.
4 **Q Since joining the board, has the board ever**
5 **reviewed Mr. Jackson's performance as facilities**
6 **manager?**
7 A Not to my knowledge.
8 **Q Since joining the board, has the board ever**
9 **reviewed his compensation as facilities manager?**
10 A Not to my knowledge.
11 **Q Has Mr. Jackson's salary level ever been**
12 **presented to the board?**
13 A I'm not aware.
14 **Q Do you as board chair have any idea what**
15 **Mr. Jackson is making?**
16 A I'm not aware of that.
17 **Q Does Mr. Jackson have an American Express**
18 **card?**
19 A Not to my knowledge.
20 **Q Does Mr. Jackson ever receive reimbursements**
21 **for credit card expenses?**
22 A Not to my knowledge.

Page 102

1 MR. MARKS: Objection. Let me ask,
2 what time frame are you referring to?
3 MR. MALONEY: Any time that you're
4 aware of during his employment by Jericho.
5 A I'm not aware.
6 BY MR. MALONEY:
7 **Q What steps has the board taken to deal with**
8 **the fact that three of its five trustees are salaried**
9 **employees of the church -- and by "steps," I mean**
10 **steps to insulate conflict of interest or to deal**
11 **with the problems of employees serving as board**
12 **members?**
13 **Has the board considered this issue at all**
14 **that you're aware of?**
15 A I'm not aware.
16 **Q Does the church have any credit cards?**
17 A Not to my knowledge.
18 **Q Has the church ever had credit cards that**
19 **you're aware of?**
20 A Not to my knowledge.
21 **Q Does the church have a written policy**
22 **concerning credit card reimbursement?**

Page 103

1 A I'm not aware of anything.
2 **Q Does the church have a written policy**
3 **concerning expense reimbursement?**
4 A I'm not aware.
5 **Q Does the church have any policies, written**
6 **or otherwise, concerning employees or board members**
7 **receiving expense reimbursements?**
8 A I'm not aware.
9 **Q Ms. Williams, as Chief Financial Officer,**
10 **are you aware of there being a foreclosure on her**
11 **home?**
12 A I'm not aware.
13 **Q Where is Ms. Williams living now?**
14 A I'm not aware.
15 **Q You have no idea?**
16 A No, I don't.
17 **Q Are you aware that she is renting out a**
18 **basement at this point?**
19 A No, I'm not aware of it.
20 **Q All right. Ms. Killen, the secretary, is**
21 **that a full-time position?**
22 A To my knowledge.

Page 104

1 **Q When you say to your knowledge, you're the**
2 **board chair; correct?**
3 A Yes, I am.
4 **Q And what are her responsibilities as the**
5 **secretary?**
6 A I'm not quite sure. I have not seen a job
7 description. I'm not aware of that.
8 **Q Does she work full-time at the church; is**
9 **that a full-time job or a part-time job, or what is**
10 **it?**
11 A To my knowledge, it's full-time.
12 **Q And when you say you've not seen a job**
13 **description, what have you as the Chairman of the**
14 **Board observed that she does all day?**
15 A I can't answer that. I'm not there all day.
16 **Q Well, what does she do -- what has she done**
17 **for any part of the day? I mean, what does she get**
18 **paid to do?**
19 A I'm really not aware of all her duties or
20 her duties.
21 **Q Are you aware of any of her duties?**
22 A I know she has been very instrumental in

Page 105

1 working with -- you know, she works very closely with
2 the pastor, and I don't know what those duties are.
3 MR. MARKS: Tim, I'm sorry, can I ask
4 you --
5 MR. MALONEY: Sure.
6 MR. MARKS: Do you feel okay?
7 THE WITNESS: I'm all right.
8 BY MR. MALONEY:
9 **Q And with respect to her duties when she**
10 **works closely with the pastor, are you referring to**
11 **Joel Peebles?**
12 A No, no, the Apostle, Pastor Peebles.
13 **Q Since the Apostle died, what has Denise**
14 **Killen been doing as an employee of the church, if**
15 **anything?**
16 A I know she works very closely with the
17 warehouses and -- and she administrates that, and she
18 has been working very closely with the -- with the
19 residences.
20 **Q Does she have a full-time job? Is**
21 **it -- strike that.**
22 **Does she have a secretary herself?**

Page 106

1 A No, she doesn't.
2 **Q How many employees does the church have?**
3 A All totaled, I don't know.
4 **Q Do you have any idea; is it five, 10, 20,**
5 **30?**
6 **Do you have any idea whatsoever?**
7 MR. MARKS: Let me object. She has
8 answered the question and said she did not know,
9 calls for speculation.
10 MR. MALONEY: I'm testing her with
11 respect to numbers to see if she can put it in a
12 range. We can start off with one or a thousand or is
13 it five or 30?
14 BY MR. MALONEY:
15 **Q Are you able to even given us a range as to**
16 **the number of employees?**
17 **Are you as board chair able to tell us even**
18 **a range as to the numbers of employees the church**
19 **has?**
20 A If I had to give you a range, I would say 25
21 to 30.
22 MR. MARKS: Don't guess.

Page 107

1 BY MR. MALONEY:
2 **Q I never want you to guess today.**
3 A Uh-huh.
4 **Q But your best estimate is 25 to 30; is that**
5 **correct?**
6 MR. MARKS: I'm going to object. That
7 would be a guess. She stated she didn't know.
8 A That was a guess. I don't know.
9 BY MR. MALONEY:
10 **Q In other words, you could not tell us**
11 **whether --**
12 A I can't tell you how many.
13 **Q You can't even -- as board chair, you cannot**
14 **give us a range of the number of employees without**
15 **guessing; is that correct?**
16 A Not off the top of my head, I can't.
17 **Q Okay. The trustees who are also compensated**
18 **employees, has their compensation been disclosed on**
19 **the 990-Ts that have been filed with the Internal**
20 **Revenue Service?**
21 MR. MARKS: Let me object. That
22 question presumes facts for which there is no basis.

Page 108

1 You may answer, if you know.
2 A I'm not aware.
3 BY MR. MALONEY:
4 **Q Have -- what steps have you as board chair**
5 **or has the board taken as a whole to insure that**
6 **their compensation has been reported to the IRS on**
7 **the 990-T?**
8 MR. MARKS: Objection again to the
9 question. Again, it presumes facts for which there
10 is no basis.
11 You may answer if you know.
12 A I'm not aware.
13 BY MR. MALONEY:
14 **Q As the board chair, is it your**
15 **responsibility to run the church on a day-to-day**
16 **basis?**
17 A As a Trustee Board --
18 **Q Yes.**
19 A -- Chair? No.
20 **Q Who runs the church on a day-to-day basis?**
21 A The officers of the church.
22 **Q And who are they?**

Page 109

1 A They are myself, Denise Killen, Clarence
2 Jackson and Dorothy Williams.
3 **Q All right. But my question is: Who is**
4 **physically in charge on a day-to-day, hour-to-hour**
5 **basis at the church?**
6 **Who is the Chief Administrative**
7 **Officer -- or is there one?**
8 A Yes, that's Denise Killen.
9 **Q All right. So you believe that Denise**
10 **Killen is the individual who runs the church on a**
11 **day-to-day basis; is that correct?**
12 A Yes, uh-huh.
13 **Q And who reports to Denise Killen?**
14 A I'm really not aware of that.
15 **Q And with respect to Ms. Killen's background**
16 **to serve as the Chief Administrative Officer of the**
17 **church, what is that background that you're aware of**
18 **as the chair?**
19 A Experience; she has been working with the
20 pastor.
21 **Q You're talking about Pastor**
22 **Peebles -- Pastor Betty Peebles?**

Page 110

1 A Apostle Betty Peebles; yes.
2 **Q Anything else?**
3 A No, I'm not aware.
4 **Q When the board's appointment was -- there**
5 **came a time, did there not, that the new trustees or**
6 **purported new trustees' names were announced to the**
7 **church after the death of Betty Peebles.**
8 **Do you remember that?**
9 A I'm not aware.
10 **Q So as far as you know, the names of the**
11 **trustees have never been publicly announced to the**
12 **church; is that your recollection?**
13 A I'm not aware of that.
14 **Q Do you have any plans to announce -- do you**
15 **deny that in October of 2010, in fact, there was a**
16 **public announcement to the church community of the**
17 **names of the trustees?**
18 **You have no recollection of that?**
19 A Ask that question again. I'm sorry.
20 **Q Do you have no recollection of the names of**
21 **the trustees being announced to the congregation**
22 **after the death of Apostle Peebles? You don't recall**

Page 111

1 **that?**
2 A I'm not aware of that.
3 **Q Do you as the chair have any plans to tell**
4 **the congregation at any point who the trustees**
5 **actually are?**
6 A Not at this time.
7 **Q And why do you plan to keep the**
8 **names -- conceal the names of the trustees from the**
9 **congregation?**
10 MR. MARKS: Objection to the
11 characterization of concealment.
12 MR. MALONEY: Go ahead.
13 MR. MARKS: You may answer.
14 A I'm not concealing.
15 BY MR. MALONEY:
16 **Q Well, do you ever plan to announce the names**
17 **of the trustees to the --**
18 A I stated, "Not at this time."
19 **Q And why is that?**
20 MR. MARKS: Let me object to the
21 question. Again, it presumes facts for which there
22 are no basis.

Page 112

1 You may answer, if you know.
2 A I'm not sure. I'm not aware of just when.
3 BY MR. MALONEY:
4 **Q Well, why would you not do it yet?**
5 MR. MARKS: Let me object. Again,
6 there is a presumption of facts for which there is no
7 basis that the names are not -- I'm sorry, I'll stop
8 there.
9 MR. MALONEY: Go ahead.
10 BY MR. MALONEY:
11 **Q Is there any reason not to tell them now?**
12 A I don't have any reasons.
13 **Q You just don't want to yet?**
14 MR. MARKS: Objection. Presumes facts
15 for which there are no basis.
16 A Not at this time.
17 BY MR. MALONEY:
18 **Q Who is the pastor of Jericho?**
19 A Right now, we don't have a pastor.
20 **Q Well, who has been the pastor since --**
21 **A We have an assistant pastor, like an interim**
22 **pastor.**

Page 113

1 **Q And who is that?**
2 A Elder Joel.
3 **Q And who has been the pastor since the death**
4 **of Apostle Betty Peebles on October 12th, 2010?**
5 A Joel has been an interim pastor.
6 **Q And how is it that he became the interim**
7 **pastor?**
8 A Because he was the assistant pastor for
9 early morning services, so he just took on the 11:00
10 o'clock service.
11 **Q So, in other words, after -- so, in other**
12 **words, after the death of Betty Peebles, he just took**
13 **on the 11:00 o'clock service; is that correct?**
14 A Yes, uh-huh.
15 **Q Well, she was actually ill for some period**
16 **of time; correct?**
17 A She was.
18 **Q When did she stop doing the 11:00 o'clock**
19 **service?**
20 A I've -- I can't remember the date.
21 **Q Well, how long before her death did she stop**
22 **doing the 11:00 o'clock service?**

<p style="text-align: right;">Page 114</p> <p>1 A About a year.</p> <p>2 Q And when she stopped doing the 11:00 o'clock</p> <p>3 service, who started doing the 11:00 o'clock service?</p> <p>4 A We had different preachers -- elders coming</p> <p>5 up doing the service.</p> <p>6 Q And how did that work out?</p> <p>7 A Fine.</p> <p>8 Q How did the congregation react in terms of</p> <p>9 attendance at the 11:00 o'clock service with the</p> <p>10 elders and different preachers?</p> <p>11 A It's constant.</p> <p>12 Q And did there come a time when Joel Peebles</p> <p>13 took over the 11:00 o'clock service?</p> <p>14 A Yes, uh-huh.</p> <p>15 Q And when was that?</p> <p>16 A The month, I'm not sure, but I'm thinking --</p> <p>17 MR. MARKS: Don't guess.</p> <p>18 A I'm not -- I don't know exactly.</p> <p>19 BY MR. MALONEY:</p> <p>20 Q Well, when in relationship to his mother's</p> <p>21 death did Joel Peebles take over the 11:00 o'clock</p> <p>22 service?</p>	<p style="text-align: right;">Page 116</p> <p>1 A Recollection? I can't say what I recollect,</p> <p>2 because you asked me why. I can give you my -- all I</p> <p>3 have is a guesstimation here. I don't really know.</p> <p>4 Q What's your best estimation?</p> <p>5 A I guess now that he felt entitled.</p> <p>6 Q And what has happened to the</p> <p>7 attendance -- what has happened to the attendance at</p> <p>8 the 11:00 o'clock service since Joel took it over?</p> <p>9 A You mean, has it increased or decreased? Is</p> <p>10 that what you're asking?</p> <p>11 Q Yeah. Has it gone up, down or stayed the</p> <p>12 same?</p> <p>13 A Just scanning -- just scanning in my mind, I</p> <p>14 guess it remains constant.</p> <p>15 Q Okay. And what has happened to the</p> <p>16 offering -- the regular, main offering at the Sunday,</p> <p>17 11:00 o'clock service since Joel has taken over?</p> <p>18 A I was told that it was down.</p> <p>19 Q And who told you that?</p> <p>20 A Chief Officer -- Chief Financial Officer,</p> <p>21 Dorothy Williams.</p> <p>22 Q But when she told you that, you haven't seen</p>
<p style="text-align: right;">Page 115</p> <p>1 A I'm not aware exactly when.</p> <p>2 Q Well, was it before she died or after she</p> <p>3 died?</p> <p>4 A I'm not sure. I'm not aware of that, just</p> <p>5 when.</p> <p>6 Q And why did Joel Peebles take over the 11:00</p> <p>7 o'clock service?</p> <p>8 A I'm not aware of why.</p> <p>9 Q Well, did the board take any action or any</p> <p>10 steps to have him take over the 11:00 o'clock service</p> <p>11 or did it just happen?</p> <p>12 A The board did not take any action.</p> <p>13 Q Well, how is it that Joel Peebles</p> <p>14 became -- took over the 11:00 o'clock service without</p> <p>15 board action?</p> <p>16 A I can guesstimate, but I can't tell you.</p> <p>17 Q Give me your best recollection. That's all</p> <p>18 I'm asking for.</p> <p>19 A If I had to guess, I would say probably --</p> <p>20 MR. MARKS: Don't guess.</p> <p>21 BY MR. MALONEY:</p> <p>22 Q Just give me your best recollection.</p>	<p style="text-align: right;">Page 117</p> <p>1 any reports or numbers; correct?</p> <p>2 A No, I have not.</p> <p>3 Q Okay. And what's happened at the 8:00</p> <p>4 o'clock service with Joel in the last year, if you</p> <p>5 know, as far as attendance?</p> <p>6 A It appears to be constant.</p> <p>7 Q And how about as far as the offering for the</p> <p>8 8:00 o'clock service?</p> <p>9 A I'm not sure.</p> <p>10 Q So you don't know one way or another -- as</p> <p>11 the board chair, you don't know one way or another;</p> <p>12 is that correct?</p> <p>13 A I know that offering has always been lower</p> <p>14 than the 11:00 o'clock offering, but just how much</p> <p>15 lower it is now, I don't know.</p> <p>16 Q All right. Well, the question I'm asking</p> <p>17 is: What has happened in terms of the volume -- the</p> <p>18 total amount in the last year?</p> <p>19 Has it gone up or down or remained the same</p> <p>20 at the 8:00 o'clock service?</p> <p>21 A I'm not aware.</p> <p>22 Q When you say that Joel -- the pastor's job</p>

Page 118

1 is vacant --

2 A Uh-huh.

3 Q -- what has the board done since the death

4 of Apostle Peebles to fill the vacant pastor's job?

5 A We haven't done anything at this time.

6 We've given, you know, 12 months' mourning period, so

7 nothing has been done at this time.

8 Q So during the mourning period, there's no

9 plans to take any action whatsoever?

10 A Not this year, no.

11 Q And what is going to happen on October 12th

12 of 2011 when the 12-month mourning period is over?

13 A Then we will start looking for a pastor or

14 have the pastor or -- I'm not just sure just how it's

15 going to take place.

16 Q Well, what discussions, if any, has the

17 board had about what to do in terms of filling the

18 vacant pastor's position?

19 A We have not gotten that far yet, actually.

20 Q Uh-huh. Well, has there been any procedure

21 set up to fill the pastor's position?

22 A Not at this time.

Page 119

1 Q Has there been a search committee

2 established for this purpose?

3 A Not at this time.

4 Q Has there been a board discussion as to what

5 to do with the pastor's position?

6 A Not at this time.

7 Q So since Betty Peebles died in October of

8 2010, there's been no discussion whatsoever as to how

9 to fill her vacancy; is that correct?

10 A That's correct.

11 Q Is there anything preventing the board from

12 doing that?

13 A It just hasn't come up yet. We still have a

14 little time there before the year is over.

15 Q Has the board discussed offering the

16 pastor's position to Joel Peebles, Sr.?

17 A We haven't discussed anything in that

18 connection.

19 Q How has Joel Peebles been doing as the

20 acting pastor? Has the board had any formal

21 procedure or informal procedure to evaluate his

22 performance?

Page 120

1 A Not no more than, you know, coming to church

2 on Sunday and as I said to you earlier.

3 Q All right. Other than having other people

4 move around on the altar too much, has the board or

5 yourself individually observed any other deficiencies

6 in his performance as pastor?

7 MR. MARKS: Let me object to the

8 characterization as pastor. He is the assistant

9 pastor.

10 MR. MALONEY: Well, as the assistant

11 pastor.

12 A We have not discussed -- we discuss

13 different issues, you know, as, you know, we wanted

14 to work with Joel in reference to getting, you

15 know -- carrying out events and all that, and he

16 refused to work with us, you know, to, you know, come

17 up with an annual calendar, you know, and that's a

18 part of the organization I told you about -- coming

19 up with an annual calendar of events, so it won't be

20 just thrown at the last minute.

21 BY MR. MALONEY:

22 Q So when you say -- you say he has refused to

Page 121

1 work with you on coming up with an annual calendar;

2 is that correct?

3 A Yes, to plan events for the church.

4 Q All right. Well, Joel Peebles, Sr., has

5 told you that you are not the duly elected board and,

6 in fact, he has filed a lawsuit -- you're aware of

7 that -- asserting that; correct?

8 A Of course, I am.

9 Q All right. Since becoming a member of the

10 board or purportedly becoming a member of the board

11 in March of 2009, have you received any complaints

12 from anyone in the congregation about Joel Peebles,

13 Sr., in terms of his administration, performance,

14 preaching or anything else?

15 A Yes, I have.

16 Q And what complaints are those?

17 A As I said, the way the service is

18 performed -- is conducted -- some of the things that

19 come across the pulpit, some of the preaching, some

20 of the people said, "That's not in the Bible. That's

21 not how it's supposed to be," you know, so they are

22 questioning how much study he puts in.

<p style="text-align: right;">Page 122</p> <p>1 Q Uh-huh.</p> <p>2 A And they feel that his wife is, you know,</p> <p>3 running him and the church.</p> <p>4 Q Uh-huh. Anything else?</p> <p>5 A I'm just trying to remember, because so many</p> <p>6 things come, you know.</p> <p>7 And the Boys Town, they feel that those boys</p> <p>8 are being exploited, you know, coming up in front of</p> <p>9 church every Sunday.</p> <p>10 Q Do you feel that Joel Peebles, Sr.,</p> <p>11 generally has been an excellent preacher yourself?</p> <p>12 A I think he has been, yes, but he was doing</p> <p>13 the 8:00 o'clock -- before he started, you know,</p> <p>14 going to 8:00 o'clock, I think he has been, and</p> <p>15 I -- and I know Joel as a good preacher, you know,</p> <p>16 when he studies and comes prepared.</p> <p>17 Q Can you cite any instance in which Joel</p> <p>18 Peebles, Sr., has come unprepared to the</p> <p>19 pulpit -- you, yourself?</p> <p>20 A Some Sundays -- I can't remember what Sunday</p> <p>21 or what -- couple of Sundays that we just had singing</p> <p>22 or just worship instead of the message.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q And the people who say that his wife is</p> <p>2 running him and running the church, do you recall any</p> <p>3 of their names?</p> <p>4 A Not at this time, no.</p> <p>5 Q And you're not yourself saying that Joel</p> <p>6 Peebles' wife is running him and running the church,</p> <p>7 are you?</p> <p>8 A I am saying that that's what was said to me.</p> <p>9 Q Right.</p> <p>10 A But at some times on my personal note, I</p> <p>11 feel that she does; yes.</p> <p>12 Q And what is it that you have observed about</p> <p>13 Joel and his wife that causes you to feel that his</p> <p>14 wife may be running him or the church?</p> <p>15 A Well, on one of the meetings that we had as</p> <p>16 a board and when Joel came to the meeting, he was</p> <p>17 fine, you know, but when his wife comes with him, he</p> <p>18 is totally different.</p> <p>19 Q How so?</p> <p>20 A He is a little bit more resistant.</p> <p>21 Q You, yourself, don't have any personality</p> <p>22 problems with his wife, do you?</p>
<p style="text-align: right;">Page 123</p> <p>1 And there's been a few times where, you</p> <p>2 know, the Word was not, you know, exactly what it</p> <p>3 should have been -- you know, stated the way it</p> <p>4 should have been stated.</p> <p>5 Q And when was that?</p> <p>6 A I cannot tell you when.</p> <p>7 Q And you're saying he didn't state the Word</p> <p>8 of the Bible correctly?</p> <p>9 A Yes.</p> <p>10 Q And what specific Bible passages did he</p> <p>11 misstate?</p> <p>12 A I cannot remember.</p> <p>13 Q And are you aware of what he said</p> <p>14 incorrectly and what the correct Bible passage was?</p> <p>15 A I cannot remember.</p> <p>16 Q And did you raise that issue with him at</p> <p>17 that time?</p> <p>18 A I have not raised it with him.</p> <p>19 Q And the people who complained to you about</p> <p>20 him not giving a correct interpretation of the Bible,</p> <p>21 do you remember any of their names?</p> <p>22 A Not right off the top of my head.</p>	<p style="text-align: right;">Page 125</p> <p>1 A Oh, Lord, no.</p> <p>2 Q In fact, you have a lot of respect for her,</p> <p>3 don't you?</p> <p>4 A I respect her as being Joey's wife, yes.</p> <p>5 Q Well, that's in her own right, too, as her</p> <p>6 own person. You respect her that way, don't you?</p> <p>7 A I don't have anything against her.</p> <p>8 Q But do you respect her? You respect her as</p> <p>9 her own person, don't you?</p> <p>10 A I don't have anything against her -- nothing</p> <p>11 whatsoever.</p> <p>12 Q What action, if any, did the board take with</p> <p>13 regard to the relationship with the Redskins on</p> <p>14 Redskins parking and Redskins parking revenue?</p> <p>15 A The board hasn't taken any action.</p> <p>16 Q Are you as board chair aware of the change</p> <p>17 in procedures from the Redskins making an annual</p> <p>18 payment to the church to reverting to a situation</p> <p>19 where the church collects payments in cash from the</p> <p>20 parking patrons themselves?</p> <p>21 A I know that was a change, but it was a</p> <p>22 change prior to the Apostle, you know, passing.</p>

Page 126

1 **Q And when did that take place, if you know?**
2 A I can't remember that right off the top of
3 my head.
4 **Q Did you, yourself, after joining the board**
5 **in March of 2009 have any role whatsoever in that**
6 **change?**
7 A No, I did not.
8 **Q Has that issue, to your knowledge, ever been**
9 **presented to the board since March of 2009?**
10 A No, I'm not aware of that issue being
11 presented.
12 **Q Have you as board chair or previously as**
13 **vice chair had any communications with Michael Dillow**
14 **or Dan Snyder or any other individual from the**
15 **Redskins concerning the parking arrangements?**
16 A No, I have not.
17 **Q Did you believe that it was desirable to**
18 **move from a situation where the Redskins made a**
19 **guaranteed annual payment to one in which the church**
20 **was responsible for the collections?**
21 A I haven't given that -- I'm not -- I was not
22 aware just exactly when that happened and why that

Page 127

1 happened, so no, I don't have --
2 **Q Since the church went from the arrangement**
3 **with the Redskins to collecting the parking revenue**
4 **on their own, what has happened to the annual**
5 **revenue? Has it gone up or down or remained the**
6 **same?**
7 A I'm not sure.
8 **Q Have you seen any reports with respect to**
9 **the parking revenue to show what the amount of the**
10 **revenue is or whether it's increasing or decreasing**
11 **or remaining the same?**
12 A No, I have not.
13 **Q Have you asked any individuals who are**
14 **responsible for this at the church what the parking**
15 **revenue situation is and whether it's going up or**
16 **down or remaining the same?**
17 A I'm not aware.
18 **Q Who is responsible for running the parking**
19 **program and insuring the proper collection of parking**
20 **revenue from the patrons?**
21 A Deacon Clarence Jackson collects and it's
22 submitted to the financial officer. That's all I

Page 128

1 know. I'm not aware of anything else.
2 **Q And what procedures, if any, has the board**
3 **or the church put into place to insure the financial**
4 **integrity of the parking collections?**
5 A I'm not aware.
6 **Q Are you concerned about the potential loss**
7 **of revenue as a result of cash being handled at**
8 **Jericho under this new arrangement?**
9 A I'm not concerned. The Apostle was aware of
10 it and -- I'm not -- I'm not concerned.
11 **Q Well, the Apostle has been deceased since**
12 **October --**
13 A Uh-huh.
14 **Q -- 10th of -- October 12th of 2010. Who is**
15 **overseeing this now? Has the board had any**
16 **discussion about the Redskins parking situation that**
17 **you're aware of at any time since you joined the**
18 **board?**
19 A I'm not aware.
20 **Q When you say Mr. Jackson is responsible,**
21 **what does Mr. Jackson do in terms of managing the**
22 **Redskins parking situation?**

Page 129

1 A I'm not aware of all he does.
2 **Q All right. Well, what procedures -- is**
3 **there a parking committee on the board that reviews**
4 **this?**
5 A Not -- I'm not aware of one.
6 **Q What procedures are in place at the board**
7 **level to monitor the parking situation and insure**
8 **that the church is maximizing its revenue from its**
9 **stadium -- from its football parking capacity?**
10 A I'm not aware of any at this time.
11 **Q Why have you not taken any action as board**
12 **chair or why has the board not taken any action to**
13 **review the Redskins situation?**
14 MR. MARKS: Let me object to the form
15 of the question again. It presumes facts for which
16 there are no basis.
17 You may answer, if you know.
18 BY MR. MALONEY:
19 **Q Well, what has the board done on the**
20 **Redskins situation since you became a board member?**
21 A I'm not aware of anything.
22 MR. MARKS: I want to ask -- I don't

Page 130

1 want to get in the middle of a line of questioning,
 2 but I want to ask if we could take lunch. There's
 3 some health issues that --
 4 MR. MALONEY: Sure. We'll take lunch,
 5 come back at 1:30.
 6 MR. MARKS: Want to do that now?
 7 MR. MALONEY: Yeah, sure.
 8 MR. MARKS: Okay.
 9 MR. MALONEY: All right.
 10 THE VIDEOGRAPHER: Going off the
 11 record. The time is 12:47 p.m.
 12 (Whereupon, a luncheon recess was held
 13 from 12:47 p.m. to 2:13 p.m.)
 14 (Whereupon, Defendants' Exhibit 2:
 15 Marked for identification.)
 16 THE VIDEOGRAPHER: Back on the record.
 17 The time is 2:13 p.m.
 18 BY MR. MALONEY:
 19 **Q Okay. It's now 2:13 p.m., so the afternoon**
 20 **is slipping by here, so let's try to get as much work**
 21 **done as we can.**
 22 **I'm going to hand you, Ma'am, a binder which**

Page 131

1 **is marked as Defense Exhibit 2 and a copy for your**
 2 **counsel, and what we will do is walk through the**
 3 **binder.**
 4 **And the binder has tabs which are numbered**
 5 **serially from 1 to 40, and so when I refer to the**
 6 **tabs, I'll be referring to items which are in the**
 7 **Defense Exhibit Number 2 that is before you.**
 8 **Ask you to turn now to Tab 36, and if you'll**
 9 **go to the -- look at the first three pages of**
 10 **the -- that's an affidavit that you purported to sign**
 11 **in this case.**
 12 **And if you go to Page 3, I'm going to ask**
 13 **you: Is that your signature?**
 14 A That's my signature.
 15 **Q And did you sign this -- did you read and**
 16 **sign this affidavit?**
 17 A Yes, I did.
 18 **Q And who prepared this affidavit for you?**
 19 A The affidavit was prepared by my attorney --
 20 the church attorney, Isaac Marks.
 21 **Q And did you have any role in preparing it**
 22 **yourself?**

Page 132

1 A As far as the information pertained there.
 2 **Q Okay. And you make a statement here --**
 3 A Where are you looking?
 4 **Q I'm looking -- hold on. Do you have it**
 5 **right in front of you? All right.**
 6 A Which statement are you looking --
 7 **Q Hold on. Let me ask the question and then**
 8 **you can give the answer.**
 9 A Okay.
 10 **Q Let's go to Paragraph Number 3, "Neither**
 11 **William Meadows or Anne Leslie were elected as**
 12 **successor trustees in Resolution 1-09. Dorothy**
 13 **Williams was elected as a successor trustee, but**
 14 **resigned from the board."**
 15 **Is it your testimony that William Meadows**
 16 **and Anne Wesley were trustees at the time that**
 17 **Resolution 109 was adopted?**
 18 A I'm not aware of them being a trustee at
 19 that time.
 20 **Q Well, why do you say, "were not elected as a**
 21 **successor trustee."**
 22 **Have William Meadows and Anne Leslie ever**

Page 133

1 **been trustees, to your knowledge?**
 2 A Not to my knowledge.
 3 **Q Okay. Let's go to -- let's now go to**
 4 **exhibit -- Tab Number 7, okay?**
 5 **Tab Number 7 is a Certificate of**
 6 **Organizational Documents and Adoption of Resolution,**
 7 **and it has -- and it's dated December 13, 1998, and**
 8 **it is signed by Betty Peebles, Joel Peebles, Sr.,**
 9 **William Meadows and Minister Lucy Lane as for**
 10 **trustees.**
 11 **Do you see that document?**
 12 A Yes, I do.
 13 **Q Do you see their signatures?**
 14 A I see their signatures.
 15 **Q Do you have any reason to doubt the**
 16 **authenticity of the document which is Tab Number 7?**
 17 MR. MARKS: Objection, calls for --
 18 THE WITNESS: I'm not aware -- sorry.
 19 MR. MARKS: Objection. Calls for a
 20 legal conclusion.
 21 MR. MALONEY: Go ahead.
 22 MR. MARKS: You may answer, if you

Page 134

1 know.
2 A I'm not aware of this document.
3 BY MR. MALONEY:
4 **Q My question is: Are you -- do you have any**
5 **reason to doubt its authenticity?**
6 MR. MARKS: Objection. Mr. Maloney,
7 she said she is not aware of the document.
8 MR. MALONEY: No, my question is: Is
9 she aware of any facts in her own mind that would
10 cause her to question whether or not this document is
11 authentic and genuine or not?
12 A This is my first time seeing -- looking or
13 seeing this document.
14 BY MR. MALONEY:
15 **Q Take your time. Take as much time as you**
16 **need and look it over and then focus on the question**
17 **which I have asked, which is: Whether or not you**
18 **know of any reason to doubt the authenticity of this**
19 **document.**
20 MR. MARKS: And I still raise the
21 objection that the question calls for a legal
22 question.

Page 135

1 You can answer if you know.
2 THE WITNESS: Please ask it -- your
3 question again now.
4 BY MR. MALONEY:
5 **Q Do you have any reason to doubt the**
6 **authenticity of this document, which is the**
7 **Certificate of Organizational Documents and Adoption**
8 **of Resolution appearing at Tab 7 of Exhibit 2?**
9 A I don't have any -- not to my knowledge.
10 **Q Any reason to doubt the genuineness of**
11 **signatures on this document?**
12 MR. MARKS: Objection for the reasons
13 previously posed.
14 Mr. Maloney, let me just say,
15 Ms. Magruder has stated she is not familiar with this
16 document, so she's also stated basically she has no
17 opinion about this document.
18 MR. MALONEY: Her testimony is going to
19 speak for itself. I want to hear from her lips, not
20 yours, as to whether or not she knows any -- has any
21 reason to doubt that these are genuine signatures.
22 MR. MARKS: But that's the basis for my

Page 136

1 objection.
2 MR. MALONEY: That's fine, counsel, but
3 speaking objection is presumptively improper, and if
4 she knows of some reason why she thinks these
5 documents are -- these signatures are not genuine or
6 forged -- if she has any reason to believe that, I
7 would like to hear from her, and if she doesn't, I
8 would like to hear that, too.
9 MR. MARKS: And she has -- there's no
10 basis for her to render such an opinion. That's why
11 I'm posing the objection.
12 MR. MALONEY: I'm not asking for an
13 opinion. I'm asking if she is aware of any facts
14 that would suggest that these signatures are not
15 genuine. She either knows facts or she
16 doesn't -- very simple.
17 A I said, not to my knowledge.
18 BY MR. MALONEY:
19 **Q Okay. Were Betty Peebles, Joel Peebles,**
20 **Sr., William A. Meadows and Lucy Lane the trustees of**
21 **Jericho Baptist on December 13th of 1998?**
22 A Not to my knowledge.

Page 137

1 **Q Who were the trustees on that day when you**
2 **say not to your knowledge.**
3 A I'm not aware of any trustees.
4 **Q So you're not aware of a Board of Trustees**
5 **even existing at that time?**
6 A Not -- not until I saw these -- this
7 document that you mentioned earlier where we filed
8 the claim, the 30 -- the document on the 30, you
9 said, 36?
10 **Q Uh-huh.**
11 A Yeah, I was not aware of that until the
12 claim was filed.
13 **Q All right. Are you aware now that Betty**
14 **Peebles, Joel Peebles, William Meadows and Lucy Lane**
15 **were the trustees in December of 1998?**
16 A I'm still not aware.
17 MR. MARKS: Again, I'm going to object.
18 That question presumes facts for which there's no
19 basis.
20 MR. MALONEY: Well, go ahead. Are you
21 aware of it or not?
22 MR. MARKS: No basis has been

Page 138

1 established.

2 MR. MALONEY: I'm asking her awareness.

3 MR. MARKS: If you know.

4 A I'm not aware.

5 BY MR. MALONEY:

6 Q Was there a Board of Trustees in December of

7 1998?

8 A Not to my knowledge.

9 Q All right. So you weren't even aware of the

10 existence of a board in 1998; is that correct?

11 A No. No, I wasn't.

12 Q All right. Was Joel Peebles, Sr., a trustee

13 at the time that you became or believed you became a

14 trustee in March of 2009?

15 A He was not a part of the Resolution 1-09.

16 Q I understand that. That's for sure.

17 A Uh-huh.

18 Q My question is: At the time prior to

19 resolution -- that resolution being prepared, was

20 Joel Peebles, Sr., a trustee?

21 A I was not aware of that.

22 Q So you don't know one way or another?

Page 139

1 A I was not aware.

2 Q All right. What were you not aware of?

3 A The question you just asked.

4 Q All right. You don't know whether he was a

5 trustee or he wasn't a trustee? You don't know one

6 way or the other; is that correct?

7 A That's correct.

8 Q Okay. Now, ask you now to take a look at

9 Number 8 -- Tab 8, Certificate of Organizational

10 Documents.

11 A Uh-huh.

12 Q And it has three signatures, four names for

13 three signatures, Betty Peebles, Joel Peebles and

14 William Meadows dated January 27, 2000.

15 Do you have any reason to doubt the

16 authenticity of this document or the genuineness of

17 the signatures?

18 MR. MARKS: And objection. There is no

19 basis for this witness to know about the authenticity

20 of anyone's signature except her own.

21 MR. MALONEY: Go ahead. You may

22 answer.

Page 140

1 MR. MARKS: If you know.

2 A I'm not aware.

3 BY MR. MALONEY:

4 Q Do you know whether, in fact, there even was

5 a Board of Trustees on January 27, 2000?

6 A I'm not aware.

7 Q It has a signature at the bottom, an

8 attestation from Deacon Anne F. Wesley, Church Clerk.

9 Who is Anne F. Wesley?

10 A Anne is a long-time member of the church,

11 and also, she worked on the Finance Committee.

12 Q And has she ever been the clerk of the

13 church?

14 A I'm not sure.

15 Q Who has been the clerk of the church, if you

16 know?

17 A I'm not aware.

18 Q Who was the clerk of the church on March

19 15th, 2009, when you signed the document that you

20 believed made you a board member?

21 A Didn't offer -- there wasn't anywhere

22 written it was the clerk of the church, it was the

Page 141

1 secretary that attested to it.

2 Q And who was that?

3 A That was Denise Killen.

4 Q Are you aware of Anne Wesley ever holding

5 the position of clerk of the church?

6 MR. MARKS: I'm sorry, clerk or

7 secretary?

8 MR. MALONEY: Clerk.

9 A No, I'm not aware of that.

10 BY MR. MALONEY:

11 Q Are you aware of her ever holding the

12 position of secretary to the church or secretary to

13 the board?

14 A I'm not aware of it.

15 Q Ask you now to take a look at Tab 9 --

16 A Uh-huh.

17 Q -- the Two-Year Report for Nonprofit and

18 Foreign Corporations.

19 A Uh-huh.

20 Q It bears the signature of Betty Peebles --

21 A Uh-huh.

22 Q -- and it lists on here as directors

Page 142

1 **Clarence Jackson, Joel Peebles, Sr., Betty Peebles,**
 2 **Joel Peebles, Anne Wesley and Dorothy Williams.**
 3 A Uh-huh.
 4 **Q And it appears to have been filed on**
 5 **September 26th, and it looks like the year 2002, but**
 6 **I can't be sure.**
 7 **Do you have any reason to doubt the**
 8 **genuineness or the authenticity of this document?**
 9 A Not to my knowledge.
 10 **Q Does that appear to be Betty Peebles'**
 11 **signature?**
 12 A It appears to be her signature.
 13 **Q Now, I ask you to take a look at Number 10,**
 14 **Certificate of Corporate Resolution, and it lists the**
 15 **individuals who are authorized to adopt the Master**
 16 **Agreement with Bank of America as Betty Peebles, Joel**
 17 **Peebles, Sr., Deacon Dorothy Williams and Deacon Anne**
 18 **Wesley, and then there are signatures on the second**
 19 **page, and then there's a Certificate of**
 20 **Organizational Documents behind it, and it appears to**
 21 **be signed by trustees on 29, September, 2002. That**
 22 **includes Betty Peebles, Joel Peebles, John Peebles,**

Page 143

1 **Sr., William Meadows, Dorothy Williams and Anne**
 2 **Wesley.**
 3 **Do you have any reason to doubt the**
 4 **authenticity of those signatures or the genuineness**
 5 **of the document?**
 6 MR. MARKS: Counsel, will you grant me
 7 a continuing objection?
 8 MR. MALONEY: Sure. I'll be happy to.
 9 MR. MARKS: All right. I'll just note
 10 a continuing objection to that line of questioning.
 11 A Not to my knowledge.
 12 BY MR. MALONEY:
 13 **Q Looking at the signature of Betty Peebles**
 14 **that appears on Page 2 next to the name "Trustee,"**
 15 **along with the other trustees, does that appear to be**
 16 **her signature?**
 17 A It appears to be.
 18 **Q Were the individuals who are listed on Page**
 19 **2 here -- were those the trustees of Jericho Baptist**
 20 **on September 29th, 2002?**
 21 A I'm not aware of this.
 22 **Q Are you saying you're not aware of it**

Page 144

1 **because you had no idea who the trustees were at that**
 2 **time?**
 3 A I didn't even know the Trustee Board at that
 4 time.
 5 **Q When did you first learn that a Trustee**
 6 **Board existed?**
 7 A Basically, when motion was filed, when I
 8 talked with Joel.
 9 **Q What do you mean when you --**
 10 A In October.
 11 **Q In October of 2010 at the residence board**
 12 **meeting?**
 13 A That's correct, uh-huh.
 14 **Q And is that the first time that you learned**
 15 **that a trustee board existed and he was on the board?**
 16 A That is correct.
 17 **Q No one had ever told you that before?**
 18 A Never.
 19 MR. MARKS: I'm sorry, what trustee
 20 board are we talking about -- of Jericho or of
 21 Jericho Senior Living?
 22 MR. MALONEY: Of Jericho. We're

Page 145

1 talking about of Jericho Church Ministries or Jericho
 2 Church, not the Senior Living.
 3 A I was not aware. I'm sorry.
 4 THE VIDEGRAPHER: Your microphone,
 5 please.
 6 BY MR. MALONEY:
 7 **Q And what did Joel -- what did Joel tell you**
 8 **in that conversation?**
 9 A That he had documentation that he was on the
 10 board.
 11 I can't remember the whole conversation, but
 12 I can remember him saying that.
 13 **Q And what did you tell him?**
 14 A I told him I was not aware and his mother,
 15 you know, put this board together.
 16 **Q Did you tell him that he, Joel, may be the**
 17 **president, but that you were the chairman, or**
 18 **something to that effect?**
 19 A No, I did not.
 20 **Q Did you tell him that you had the chairman**
 21 **title and he had some other title?**
 22 A No, I did not.

Page 146

1 **Q What did you tell him about his title or**
 2 **role during that conversation?**
 3 A We did not talk about his role.
 4 **Q And with respect to the residence board, who**
 5 **was chairman of the residence board?**
 6 A Joel is.
 7 **Q Was he at that time?**
 8 A Was it -- I'm not aware of was he at that
 9 time or not.
 10 **Q Is he chairman of the residence board today?**
 11 A We voted him in -- let me back up. We voted
 12 him in at a meeting we had as chairman.
 13 **Q Of which board?**
 14 A Of the residences.
 15 **Q And when did that happen?**
 16 A March or April. I'm not --
 17 **Q How many boards does Jericho have of the**
 18 **church and its various affiliates?**
 19 A I understand, two.
 20 **Q And what are they?**
 21 A That's my understanding. The Board of
 22 Trustees and the -- for the church and the Board of

Page 147

1 Trustees for the residences.
 2 **Q And what is the responsibilities of the**
 3 **Board of Trustees of the church?**
 4 A To give directions. My understanding is
 5 that it is to give directions to the church, also be
 6 responsible for the monies or if you're buying
 7 anything of large quantities or anything like that.
 8 **Q Show you what is Tab 11 --**
 9 A Uh-huh.
 10 **Q -- Two-year Report for Nonprofit Foreign and**
 11 **Domestic Corporations?**
 12 A Uh-huh.
 13 **Q This appears to have been filed in the**
 14 **District of Columbia in September of 2002. It lists**
 15 **directors as Betty Peebles, Joel Peebles, and that**
 16 **Clarence Jackson, also, Anne Wesley and Dorothy**
 17 **Williams and a Betty -- can you read that name? That**
 18 **appears to be Betty Peebles, as well.**
 19 **Do you have any reason to doubt the**
 20 **authenticity of this document or the genuineness of**
 21 **the signatures?**
 22 A Not to my knowledge.

Page 148

1 **Q Showing you what is marked as Tab Number 12,**
 2 **Corporate Resolution to Borrow, dated September 29th,**
 3 **2002.**
 4 **Directing your attention to Page 4, "Members**
 5 **of the Board of Trustees," and do you see the**
 6 **signatures there?**
 7 **It appears to be -- Betty Peebles' signature**
 8 **is the first one as trustee.**
 9 **Does that appear to be her signature?**
 10 A It appears to be.
 11 **Q And it lists the trustees as Betty Peebles,**
 12 **Joel Peebles, Sr., John Peebles, Sr., William**
 13 **Meadows, Deacon Dorothy Williams and Deacon Anne**
 14 **Wesley.**
 15 **Do you have any reason to -- on -- as of**
 16 **September 29th, 2002, do you have any reason to doubt**
 17 **the authenticity of the document or the genuineness**
 18 **of the signatures?**
 19 A I have no knowledge of it.
 20 **Q Were these the individuals who were the**
 21 **trustees of Jericho on September 29th, 2002?**
 22 A I had -- I had no knowledge of it.

Page 149

1 **Q Let me show you what is now Tab 14.**
 2 A Uh-huh.
 3 **Q Two-year Report for Nonprofit Corporations**
 4 **for 2006.**
 5 **Does that appear to be Betty Peebles'**
 6 **signature there at the bottom, right-hand corner?**
 7 A It appears to be.
 8 **Q And this lists -- it lists Joel Peebles,**
 9 **Betty Peebles, Anne Wesley and Dorothy Williams as**
 10 **trustees.**
 11 **Do you see that?**
 12 A Yes, uh-huh.
 13 **Q Do you have any reason to doubt the**
 14 **genuineness of the document or the genuineness of the**
 15 **signatures on this document?**
 16 A I have no knowledge.
 17 **Q Were they the trustees on that date?**
 18 A I have no knowledge.
 19 **Q Who were the trustees of Jericho prior**
 20 **to -- prior to March 15th, 2009, when you believed**
 21 **you became a trustee?**
 22 **Who were the trustees?**

Page 150

1 A When I was made aware of it, what I -- on a
 2 document that I saw, it was Deacon Meadows, Dorothy
 3 Williams, Anne Wesley and Apostle, Betty Peebles.
 4 **Q And how about Joel Peebles, Sr.?**
 5 A The document I saw did not have his name on
 6 it.
 7 **Q And what was that document that you saw?**
 8 A One of these documents in here -- I can't
 9 remember which one.
 10 **Q Okay. Well, if you run across it, you let**
 11 **me know.**
 12 A Okay.
 13 MR. MARKS: Perhaps counsel would like
 14 to show her the document.
 15 MR. MALONEY: Well, I don't know what
 16 she's referring to. She says she saw a document.
 17 I'm not aware of such a document existing.
 18 BY MR. MALONEY:
 19 **Q Anne Wesley, if you believed she was a**
 20 **trustee prior to you becoming a trustee purportedly**
 21 **on March 15th, 2009, how is it that Anne Wesley**
 22 **stopped being a trustee?**

Page 151

1 A At that time, Anne signed herself off the
 2 board.
 3 **Q And you believed that's how that happened?**
 4 A Yes.
 5 **Q And how about William A. Meadows; how did**
 6 **William A. Meadows stop being a trustee?**
 7 A He signed himself off of the board.
 8 **Q And did he do that at anyone's request?**
 9 A I'm really not aware of just what transpired
 10 there.
 11 **Q Did you have any role in their resignations?**
 12 A No, I did not.
 13 **Q Do you know who solicited their**
 14 **resignations?**
 15 A The Apostle.
 16 **Q How do you know that?**
 17 A Because when I see this document here --
 18 **Q What tab are you looking at?**
 19 A This Tab 36.
 20 **Q Uh-huh.**
 21 A I think this is it.
 22 **Q What does that document tell you?**

Page 152

1 MR. MARKS: Can you identify the
 2 document, please, for the record?
 3 A Yeah, Resolution 1-9.
 4 BY MR. MALONEY:
 5 **Q And where is -- on Resolution 1-9, is that**
 6 **the document that you believe was presented to you,**
 7 **if we're looking at the Resolution 1-9 that begins on**
 8 **March -- dated March 15, 2009, and the back of it,**
 9 **there are four signatures, Betty Peebles, William**
 10 **Meadows, Anne Wesley and Dorothy Williams, and then**
 11 **an attestation from Anne Wesley.**
 12 A Uh-huh.
 13 **Q Is that the document that you believe was**
 14 **presented to you when you were called to Apostle**
 15 **Betty Peebles' office on March 15, 2009?**
 16 A That wasn't the one.
 17 **Q This was not the one?**
 18 A No, it had lines and I had to sign, so that
 19 was not the one.
 20 **Q And the one that you signed, what did it**
 21 **say?**
 22 A I'm trying to -- I'm trying to find it in

Page 153

1 here.
 2 **Q Well, we'll get to that in a minute. I want**
 3 **to get to this document here.**
 4 A All right.
 5 **Q Did you ever see this document in March of**
 6 **2009?**
 7 A Which one are you talking about, the 1-09?
 8 **Q Yes.**
 9 A Yes, I did. I saw this one.
 10 **Q When did you see it?**
 11 A I don't remember the date.
 12 **Q Are you aware of there being any meeting of**
 13 **the Board of Trustees consisting of Betty Peebles,**
 14 **William Meadows, Anne Wesley, Dorothy Williams and/or**
 15 **Joel Peebles, Sr., to adopt this Resolution 1-09?**
 16 A I'm not aware of.
 17 **Q Are you aware of Joel Peebles, Sr., ever**
 18 **being given notice, either of a meeting to adopt this**
 19 **Resolution or having this Resolution presented to him**
 20 **to agree to sign or not to sign it?**
 21 A I'm not aware.
 22 **Q Do you know why Joel Peebles, Sr., was not**

Page 154

1 **given either notice of the presentation of the**
2 **resolution or an opportunity to participate in a**
3 **meeting concerning this resolution?**
4 MR. MARKS: Objection, presumes facts
5 that have not been established. You may answer if
6 you know.
7 MR. MALONEY: Go ahead.
8 A I'm not aware.
9 BY MR. MALONEY:
10 **Q As Chairman of the Board, have you made any**
11 **effort to investigate the circumstances under which**
12 **Joel Peebles, Sr., was not allowed to participate in**
13 **the consideration of Resolution 1-09?**
14 MR. MARKS: Objection for the same
15 reasons. You may answer if you know.
16 A Not knowing that he was even on the board;
17 no, I have -- I have not made any investigation.
18 BY MR. MALONEY:
19 **Q What opportunity, if any, was Joel Peebles,**
20 **Sr., given to participate in the adoption or**
21 **consideration of Resolution 1-09 by the Board of**
22 **Trustees?**

Page 155

1 A I'm not aware.
2 **Q You're not aware that he was given any**
3 **opportunity?**
4 A I'm not aware.
5 **Q Okay. The -- I would like to direct your**
6 **attention now to Exhibit 17 -- Tab 17. This is a**
7 **two-page document called "Unanimous Consent of**
8 **Directors in Lieu of a Meeting." This relates to the**
9 **Jericho Senior Apartments and the directors are**
10 **listed as Betty Peebles, Joel Peebles, Sr., Anne**
11 **Wesley, Dorothy Williams and William Meadows.**
12 **Are you aware of any -- do you know of any**
13 **reason that this document is not authentic or that**
14 **the signatures are not genuine?**
15 A I'm not aware of this.
16 **Q Does that appear to be Betty Peebles'**
17 **signature on the first line of Page 2 under**
18 **"Directors"?**
19 A It appears.
20 **Q Were those individuals who are listed there,**
21 **in fact, the directors or trustees of Jericho Baptist**
22 **Church on October the 31st of 2007?**

Page 156

1 A I'm not aware.
2 **Q Do you know any reason why they would not be**
3 **directors or trustees at that time?**
4 A I'm not aware.
5 **Q Showing you now Exhibit 18, Two-Year Report**
6 **for 2008, bottom, right-hand corner, there's a**
7 **signature line for Betty Peebles.**
8 **Do you see that?**
9 A Yes.
10 **Q Does her -- that appear to be her signature?**
11 A Yes.
12 **Q And does this document also list as the**
13 **directors, Joel Peebles, William Meadows, Betty**
14 **Peebles, Joel Peebles, Anne Wesley and Dorothy**
15 **Williams?**
16 A Yes, the names are listed.
17 **Q Do you know of any reason why this document**
18 **would be not authentic or the signatures not genuine?**
19 A I'm not aware.
20 **Q Do you know any reason why these**
21 **documents -- why these individuals would not have, in**
22 **fact, been the trustees of Jericho Baptist Church on**

Page 157

1 **its date reflected here, January the 6th of 2008?**
2 A I'm not aware.
3 **Q Directing your attention to Tab 19, this is**
4 **the Personal Property Report as of -- for 2008 filed**
5 **with the Maryland Department of Assessments and**
6 **Taxation, Personal Property Division. It lists here**
7 **the President, Betty Peebles, the Vice President,**
8 **Joel Peebles, Sr., the Secretary, Anne Wesley,**
9 **Treasurer, Dorothy Williams.**
10 **Do you know any reason why these individuals**
11 **were not the officers of Jericho Baptist Church**
12 **Ministries at the time this was filed with the**
13 **Department of Assessments and Taxation on December**
14 **the 8th of 2010?**
15 A I'm not aware.
16 **Q Are you aware of Joel Peebles, Sr., ever**
17 **resigning as an officer, director or a trustee of**
18 **Jericho Baptist Church or the Jericho Baptist Church**
19 **Ministries prior to March of 2009?**
20 A I'm not aware.
21 **Q Did he ever at any time resign as an**
22 **officer, director or trustee that you know of?**

40 (Pages 154 to 157)

Page 158

1 A I'm not aware.

2 **Q Do you know of any reason -- do you**

3 **know -- and with respect to Exhibit 17 -- Tab 17 --**

4 **while this refers to the Jericho Senior Apartments,**

5 **this is, in fact, an adoption of the Resolution**

6 **adopted by the Board of Trustees of Jericho Baptist**

7 **Church, and it says so in the very first paragraph;**

8 **isn't that correct?**

9 MR. MARKS: I'm sorry, what tab number

10 is that you were referring to?

11 MR. MALONEY: Tab 17.

12 THE WITNESS: Now, what was your

13 question to that?

14 BY MR. MALONEY:

15 **Q That appears to be -- that is a resolution,**

16 **in fact, of the Board of Trustees of the church,**

17 **isn't that correct?**

18 A I'm not aware of this.

19 **Q Well, that's what it says in the very first**

20 **line, doesn't it, of Tab 17? It says so; right?**

21 A It does read that way.

22 **Q Yeah. Based on all of these documents --**

Page 159

1 A Uh-huh.

2 **Q -- and based upon your lack of any knowledge**

3 **to the contrary, are you aware of any reason why Joel**

4 **Peebles, Sr., was not, in fact, still a trustee of**

5 **Jericho Baptist Church Ministries in March of 2009**

6 **when you believe you were elected to the board in**

7 **Resolution 01-09?**

8 A I'm not aware.

9 **Q Okay.**

10 A Uh-huh.

11 **Q Now, I would like you to -- to show you Tab**

12 **35, which is the Second Amended Complaint for**

13 **Temporary Restraining Order, Preliminary and**

14 **Permanent Injunctive Relief and Declaratory Judgment.**

15 A Uh-huh.

16 **Q And I want to direct your attention to Page**

17 **11.**

18 A Okay.

19 **Q Is that your signature there?**

20 A Yes, it is.

21 **Q And did you sign it on the date next to your**

22 **signature?**

Page 160

1 A Yes, I did.

2 **Q April the 21st, 2010?**

3 A Yes, I did.

4 **Q And did you believe yourself to be a Vice**

5 **Chair of the Board of Trustees on that date?**

6 A Yes.

7 **Q All right. And why is it that you were**

8 **signing an affidavit here on April 21st of 2010?**

9 **Do you have any answer to that?**

10 A Oh, did you finish the question? I'm sorry.

11 **Q Yes. Why were you -- is that, in fact, the**

12 **correct date, April 21st of 2010, that you signed**

13 **that affidavit?**

14 A Yes.

15 MR. MARKS: Counsel, let me just say, I

16 prepared that. That's a typo.

17 THE WITNESS: I'm sorry, it should be

18 December.

19 MR. MALONEY: All right. That's what I

20 want to make clear here.

21 THE WITNESS: Please.

22 MR. MALONEY: That's why I'm asking,

Page 161

1 because it said 2010 here.

2 MR. MARKS: No, the year.

3 THE WITNESS: It should be 2009 or --

4 MR. MARKS: That's the Second Amended

5 Complaint.

6 THE WITNESS: Oh, the second, that's

7 right, 2010.

8 BY MR. MALONEY:

9 **Q Above this, you solemnly affirm under the**

10 **penalties of perjury that the contents of the**

11 **Complaint are true to the best of your knowledge,**

12 **information and belief.**

13 A Exactly.

14 **Q And I want to ask you about some of the**

15 **statements you swore to.**

16 A Okay.

17 **Q Let's begin on paragraph number one where**

18 **you state that you, among others, "are the lawfully**

19 **elected legal representatives of the church."**

20 **Why do you believe that you are the lawfully**

21 **elected legal representative of the church?**

22 A Because the Apostle called this board

Page 162

1 together, and I had no reason not to believe.
 2 **Q Is that based on what the Apostle told you?**
 3 A That's correct, uh-huh.
 4 **Q So that's not based -- so your opinion here**
 5 **when you signed this affidavit is not based on any**
 6 **action of the board, but based on what the Apostle**
 7 **told you; is that correct?**
 8 A Well, that's not the question you asked.
 9 **Q Well, I'm asking it.**
 10 A No, that's not correct. It was a board
 11 decision, but you asked me why was I -- why did I
 12 believe that I was, you know, on the board. Isn't
 13 that what you asked?
 14 **Q When Joel Peebles -- when you say it was a**
 15 **board decision, did Joel Peebles participate in that**
 16 **board decision?**
 17 A He is not one of the members of the board.
 18 **Q And how do you know that?**
 19 A Because, as I said earlier, the
 20 pastor -- the Apostle, you know, in March of '09, you
 21 know, assembled this board.
 22 **Q If you -- does the Apostle in your view have**

Page 163

1 **the authority on her own without full board action to**
 2 **assemble the board on her own?**
 3 A And the people who were -- who were on the
 4 board, you know, signed themselves off.
 5 **Q Well, was Joel Peebles -- did he ever sign**
 6 **himself off on the board?**
 7 MR. MARKS: Objection. Presumes facts
 8 not established. You may answer if you know.
 9 MR. MALONEY: We're asking her, did
 10 Joel Peebles ever sign himself off on the board as
 11 far as you're aware?
 12 A I'm not aware.
 13 BY MR. MALONEY:
 14 **Q When did Joel Peebles, Sr., stop being a**
 15 **member of the Board of Trustees?**
 16 MR. MARKS: Objection. Again, it
 17 assumes facts not established.
 18 MR. MALONEY: Go ahead.
 19 MR. MARKS: You may answer if you know.
 20 A I'm not aware.
 21 BY MR. MALONEY:
 22 **Q Is there any reason why he isn't still a**

Page 164

1 **member of the Board of Trustees today?**
 2 MR. MARKS: If I could have a
 3 continuing objection to that line of questioning.
 4 MR. MALONEY: Sure. Go ahead.
 5 A I'm not aware.
 6 BY MR. MALONEY:
 7 **Q And when you state here, quote, in paragraph**
 8 **one -- or you affirm that "Joel Peebles and William**
 9 **Meadows," quote, "convened an illegal board meeting,"**
 10 **what does that refer to?**
 11 A They did call a meeting on this date.
 12 **Q And why was that an illegal board meeting?**
 13 A Because we are the legal board.
 14 **Q And why is Mr. -- the previous board not a**
 15 **legal board, since Joel Peebles never participated in**
 16 **Resolution 01-09?**
 17 MR. MARKS: Objection. Continuing
 18 objection.
 19 A I'm not -- I'm not aware of that.
 20 BY MR. MALONEY:
 21 **Q Now, you also state here in paragraph one,**
 22 **"Joel Peebles and William Meadows have**

Page 165

1 **misappropriated offerings."**
 2 **What facts are you aware of that Joel**
 3 **Peebles and William Meadows have done that?**
 4 A Money is not being turned into the finance
 5 office.
 6 **Q And how much money was that?**
 7 A I can't answer, never seen it.
 8 **Q And what occasions -- did you ever see that**
 9 **happen yourself?**
 10 A I have seen on Sunday when money was taken
 11 up that it was not submitted to the finance office.
 12 **Q Well, why does this finance office have**
 13 **authority over anybody else? Why doesn't the Board**
 14 **of Trustees that was in effect prior to March 15th of**
 15 **2009 have authority over this?**
 16 A I have no knowledge of a board prior to.
 17 **Q So you can't speak to how the authority of**
 18 **that board prior to March 15th, 2009, was ended or**
 19 **terminated; is that correct?**
 20 A I have no knowledge of a board.
 21 **Q Have you ever -- have you or anyone else on**
 22 **the board ever been notified by the Bank of America**

Page 166

1 that they are not going to participate in any more
 2 loan extensions based solely on the signatures of the
 3 group you claim to have -- to have as the Board of
 4 Trustees?
 5 A Not to my knowledge.
 6 Q You've not received any notice of that from
 7 the Bank of America?
 8 A Not to my knowledge.
 9 Q What communications, if any, are you aware
 10 of that the church has received from the Bank of
 11 America concerning either its loan status, its
 12 borrowing authority or anything else concerning its
 13 banking relationship with the Bank of America?
 14 A I have no knowledge.
 15 Q Do you know anything about the
 16 status -- current status of Jericho Baptist banking
 17 relationship with the Board of America?
 18 A The Board of America?
 19 Q With the Bank of America.
 20 A I'm not aware.
 21 Q Does Jericho have any relationship with any
 22 other banking institutions other than the Bank of

Page 167

1 America?
 2 A I'm not aware.
 3 Q Was William Meadows ever given any notice of
 4 any meeting in March of 2009 to elect a new group on
 5 the board?
 6 A I'm not aware, but I see his signature on
 7 the paperwork.
 8 Q Do you know anything about the circumstances
 9 under which that purported signature appeared on the
 10 paperwork?
 11 A I'm not aware.
 12 Q Looking at Paragraph 6 of the Complaint
 13 here, Paragraph 6 says, "The Board of Trustees were
 14 elected by a unanimous vote of the original members
 15 of the Board of Trustees in March of 2009."
 16 A Uh-huh.
 17 Q Was it unanimous if Joel Peebles, Sr., was
 18 excluded from that board?
 19 A Again, I'm not aware of Joel being on the
 20 board.
 21 Q Well, you've now seen the documentation
 22 attesting to it.

Page 168

1 Do you know how, based on that
 2 documentation, Joel's authority to serve on the board
 3 was terminated?
 4 Do you have any idea?
 5 A No.
 6 MR. MARKS: Objection.
 7 MR. MALONEY: Good. You may answer.
 8 MR. MARKS: It presumes facts not
 9 established.
 10 You may answer if you know.
 11 A I'm not aware.
 12 BY MR. MALONEY:
 13 Q Showing you Paragraph 8 of the Complaint
 14 here, it states right here that "Joel is an elder of
 15 the church, was former headmaster of Jericho
 16 Christian Academy operated by the church who was
 17 removed as headmaster by Pastor Peebles for
 18 mismanagement in 2008 when the grades of the school
 19 were scaled back from pre-K to 12 to pre-K to 6."
 20 Do you see that right there?
 21 A Yes, uh-huh.
 22 THE VIDEOGRAPHER: Excuse me, slide a

Page 169

1 little bit back to your left.
 2 BY MR. MALONEY:
 3 Q What knowledge do you have about any
 4 mismanagement by Joel Peebles, Sr., of the Jericho
 5 Christian Academy?
 6 A The pastor called me in -- the Apostle
 7 called me into a meeting, and along with others, and
 8 showed -- and showed us a document of how much money
 9 we were in the hole there at the academy.
 10 Q And --
 11 A And she said that Joey would not listen to
 12 her and he has families over there that are not
 13 paying for their children, which caused, you know,
 14 the -- over a million dollars, you know, in debt over
 15 there at the academy.
 16 Q Anything else?
 17 A At the academy?
 18 Q Yes.
 19 A And then, you know, she had to scale back
 20 the school, you know. The school was from -- they
 21 had child development services there -- early
 22 childhood development services there and K through

Page 170

1 12, and then she had to scale the school back to
 2 early childhood development, then K through 5.
 3 **Q When did you have this conversation with**
 4 **Betty Peebles?**
 5 A The date, I don't remember.
 6 **Q Well, when was it in relationship to her**
 7 **death?**
 8 A It was in 2008. It was in 200' -- it was
 9 school year 2008, but I think it was 2009.
 10 **Q Was this before or after you were called to**
 11 **the office to become a trustee?**
 12 A This was before.
 13 **Q And what was the reason, if you know, that**
 14 **she was telling you all of this?**
 15 A Well, the Apostle and I have been friends
 16 for a long time. Also, I worked very closely with
 17 her, you know, at the church for a long time, and
 18 she -- she shared this information with me.
 19 **Q Well, was she asking you to do something**
 20 **about it or just getting it off her chest?**
 21 A She had decisions to be made, you know, what
 22 she was going to do, how she should do it and, you

Page 171

1 know, we bounced things off, you know, because she
 2 was going to close the school down at one time, and I
 3 said, "Well, don't close it down. Could we salvage
 4 some of the grades?"
 5 **Q And other than that one conversation, did**
 6 **you have any other conversations with her about it?**
 7 A We had quite a few conversations on the
 8 school.
 9 **Q Uh-huh.**
 10 A Yeah.
 11 **Q Did she ask you to get involved in running**
 12 **the school or solving the problem?**
 13 A She asked me to go over there and get the
 14 school open for the new year, because it happened at
 15 the end of the year --
 16 **Q Did you do that?**
 17 A -- when she closed it down. Yes, I did.
 18 **Q And when did you do that?**
 19 A For school year 2009.
 20 **Q Now, when she told you that the school was**
 21 **in debt a million dollars, did you, yourself, have**
 22 **any personal knowledge as to whether that was true?**

Page 172

1 A I saw the -- the documentation of it.
 2 **Q When you say you saw the documentation --**
 3 A Uh-huh.
 4 **Q -- did you see financial reports from the**
 5 **school?**
 6 A Yes, uh-huh.
 7 **Q Did you participate in any Board of Trustees**
 8 **meetings to decide what to do about the academy and**
 9 **whether to scale it back or close it or what to do?**
 10 MR. MARKS: Objection. It presumes she
 11 was on the board.
 12 MR. MALONEY: No, I'm asking whether
 13 she is aware of any Board of Trustees proceedings on
 14 this.
 15 A Not to my knowledge.
 16 BY MR. MALONEY:
 17 **Q And when you say "mismanagement," are you**
 18 **specifically -- do you have any personal knowledge**
 19 **yourself of any actions or inactions by Joel Peebles,**
 20 **Sr., that constituted mismanagement of the academy?**
 21 A The number of families that were not paying
 22 and the employees said that Joey asked them to let

Page 173

1 those families into the school without paying.
 2 **Q Which employees told you that?**
 3 A It was at that time the principal, the
 4 registrar, also a secretary.
 5 **Q And were these families being allowed to**
 6 **continue as a form of financial aid or scholarship or**
 7 **charity because of their own financial conditions?**
 8 A Some of them -- they had some criteria
 9 established.
 10 **Q Right.**
 11 A And I can't remember what -- the criteria
 12 right now, but the number of families
 13 exceeded -- there were some were paying zero dollars.
 14 **Q Well --**
 15 A So --
 16 **Q Were those families that couldn't afford to**
 17 **pay any money, but were admitted anyway?**
 18 A I can't -- I'm not aware of whether they
 19 could or could not pay.
 20 **Q Did you ever see the budget for the school?**
 21 A I saw the financial statements.
 22 **Q My question is: Did you ever see the**

Page 174

1 **budget?**
 2 A I'm not aware. I'm not aware.
 3 **Q Did you ever see the written criteria as to**
 4 **when a family is required to pay and when?**
 5 A Yes, I did see that.
 6 **Q And did you ever see whether or not -- any**
 7 **written evidence that that criteria was violated in**
 8 **any way?**
 9 A Yes, at the time. I cannot cite specifics,
 10 because at the time.
 11 **Q Well, which families or children were**
 12 **admitted in -- or allowed to continue in violation of**
 13 **the financial aid criteria?**
 14 A I'm not aware.
 15 **Q How many were allowed to continue in**
 16 **violation of the financial aid criteria?**
 17 A I'm not aware of that either.
 18 **Q What happened to the academy when it was**
 19 **scaled back from K through 12 to K-6 or K-5?**
 20 A The number of enrollees dropped.
 21 **Q Well, that's obvious.**
 22 A Uh-huh.

Page 175

1 **Q But what happened to the financial**
 2 **sustainability of the institution?**
 3 A Oh, that's -- okay.
 4 **Q Yes.**
 5 A The academy at that time pretty much took
 6 care of itself.
 7 **Q Did Joel Peebles himself ever write any**
 8 **personal checks or make personal contributions to try**
 9 **to sustain the academy?**
 10 A I'm not aware.
 11 **Q You're not -- you have no knowledge of that**
 12 **contribution one way or the other?**
 13 A I'm not aware.
 14 **Q Is it your testimony that Joel Peebles, Sr.,**
 15 **was actually removed as headmaster of the academy for**
 16 **mismanagement?**
 17 A He was.
 18 **Q All right. And how do you know that? Did**
 19 **you see some formal documentary moving him?**
 20 A Yes, I did.
 21 **Q And what was that document?**
 22 A And I was in the meeting, also.

Page 176

1 **Q And what meeting was that at?**
 2 A The meeting that the Apostle had with the
 3 academy.
 4 **Q And who was present at that meeting?**
 5 A It was staff from the -- staff from the
 6 academy, the Apostle -- I can't remember all that
 7 were there, but the Apostle, myself, Mr. Marks. I
 8 can't remember all that was there.
 9 **Q Why was Mr. Marks there?**
 10 MR. MARKS: Objection. You don't have
 11 to answer.
 12 MR. MALONEY: Sure, she does.
 13 MR. MARKS: She does not. I'm advising
 14 you not to answer.
 15 BY MR. MALONEY:
 16 **Q Was Mr. Marks -- what was his role in coming**
 17 **to that meeting, if you know?**
 18 MR. MARKS: If you know, you may
 19 answer.
 20 A Oh, okay. I'm not aware. The Apostle
 21 brought him with her. I'm not aware.
 22 BY MR. MALONEY:

Page 177

1 **Q So you had no idea what his role was there?**
 2 A I'm not aware.
 3 **Q Are you aware of -- who actually controlled**
 4 **the expenditures of the school, if you know?**
 5 A The Apostle was the overseer.
 6 **Q So the Apostle basically was the authority**
 7 **for making disbursements of expenditures at the**
 8 **school; isn't that true?**
 9 A As far as my knowledge, yes.
 10 **Q And Joel didn't have the ability to write**
 11 **checks for the school or anything like that, did he,**
 12 **as far as you know?**
 13 A Not that I am aware of.
 14 **Q So whatever money was spent on the school**
 15 **ultimately was money that was authorized by the**
 16 **Apostle, Betty Peebles; isn't that correct?**
 17 A She was the overseer.
 18 **Q And you're not aware of Joel Peebles**
 19 **authorizing any expenditures, because he**
 20 **didn't -- inappropriate or otherwise, because he**
 21 **didn't really have that authority; isn't that**
 22 **correct?**

Page 178

1 MR. MARKS: Let me object to the
 2 phrasing of your question, counsel.
 3 You previously asked and she responded
 4 if the Assistant Pastor Peebles had the authority to
 5 write checks, not authorize expenditures. That's a
 6 slightly different characterization.
 7 MR. MALONEY: Go ahead. You may
 8 answer.
 9 A I'm not aware.
 10 BY MR. MALONEY:
 11 Q Okay. And you don't know of Joel Peebles
 12 attempting to have any expenditures for the academy
 13 that were inappropriate, are you?
 14 A I'm not aware.
 15 Q Okay. Showing you what is marked Paragraph
 16 26 of the Complaint, which is on Page 6, one of the
 17 statements you make here is that "The actions of
 18 Defendant Joel Peebles and Defendant Meadows have
 19 fulment discord, disharmony and confusion throughout
 20 the congregation of the church for which the church
 21 will suffer irreparable harm if injunctive relief is
 22 not issued."

Page 179

1 What has Joel Peebles and Defendant Meadows
 2 done to fulment discord, disharmony and confusion
 3 throughout the congregation?
 4 A I think sharing of this Complaint -- this
 5 litigation throughout the church.
 6 Q Well, did you authorize the filing of this
 7 litigation?
 8 A Yes, I did.
 9 Q Did you expect it to be a secret within the
 10 church when you did so?
 11 A No, I didn't expect it to be a secret, but I
 12 didn't expect the assistant pastor to put a spin on
 13 it, you know.
 14 Q Well, did you think that your spin should be
 15 the only one?
 16 A You know, when it comes down to him saying
 17 we're putting him out of the church and all that, and
 18 that's not what we're doing, we're just trying to
 19 solidify this board, who is who.
 20 Q Well, indeed.
 21 A Uh-huh.
 22 Q Showing you Affidavit 36 --

Page 180

1 A Uh-huh.
 2 Q -- Paragraph 7, Line 2, "Joel Peebles Sr.,
 3 has not been elected to the Board of Trustees nor was
 4 he a member of the original Board of Trustees."
 5 And you swore to this based on your personal
 6 knowledge.
 7 A Exactly.
 8 Q Do you still stand by your statement that
 9 Joel Peebles, Sr., has never, in fact, served on the
 10 Board of Trustees?
 11 A To my knowledge.
 12 Q Well, even -- even after looking at the
 13 documents at Tab 7, 8, 9, 10, 11, 12, 14, 17, 18 and
 14 19, and even after reviewing all of those documents
 15 and attesting to the signature of Betty Peebles on
 16 those documents, is it still your statement that Joel
 17 Peebles has never served on the Board of Trustees of
 18 Jericho Baptist?
 19 MR. MARKS: Objection. Counsel, first,
 20 she did not attest to the signature of Betty Peebles.
 21 Two, your question asks for a legal conclusion and
 22 presumes that -- I'll say presumes facts not

Page 181

1 established. Three, she has answered the question.
 2 MR. MALONEY: Go ahead.
 3 BY MR. MALONEY:
 4 Q Is it still your statement -- do you stand
 5 by your sworn statement here that Joel Peebles has
 6 never served on the Board of Trustees of Jericho?
 7 A According to the paperwork that I have seen
 8 today, there's a possibility that he has.
 9 Q And is this the very first time that you
 10 have ever seen this paperwork?
 11 A Yes.
 12 Q No one prior to this date --
 13 A Well, some of it. Let me say, some of it.
 14 Q What have you seen before and what have you
 15 not?
 16 A I have seen the following: The filings;
 17 that's what I have seen, uh-huh.
 18 Q Does this raise questions in your mind as to
 19 whether or not, in fact, Joel Peebles did serve on
 20 the Board of Trustees -- or has?
 21 A It's a possibility.
 22 Q Do you intend to investigate it?

Page 182

1 A I don't know what I'm going to do with it.

2 **Q Does it raise in your mind the possibility**

3 **that Joel Peebles was a -- in fact, a member of the**

4 **Board of Trustees on March 15th, 2009, when this**

5 **Resolution 01-09 was signed?**

6 **Does that raise in your mind that**

7 **possibility?**

8 A I haven't given it any thought, you know,

9 just seeing the paperwork today, you know.

10 **Q Now that you have seen the paperwork, does**

11 **it create in your mind the possibility that, in fact,**

12 **on March 15th, 2009, Joel Peebles was, in fact, a**

13 **member of the Board of Trustees of Jericho?**

14 A I'm not -- I'm not aware of that at that

15 time; no, I'm not aware of that.

16 **Q I understand your testimony is at that time**

17 **in March, 2009 --**

18 A Uh-huh.

19 **Q -- you're not aware of it, but today, you**

20 **have had the opportunity and you tell us for the**

21 **first time --**

22 A Uh-huh.

Page 183

1 **Q -- you see the documents at Tab 7, 8, 9, 10,**

2 **11, 12, 14, 17, 18 and 19.**

3 **Having seen those documents and seen Betty**

4 **Peebles signature on that, does that now raise in**

5 **your mind the possibility that on March 15th, 2009,**

6 **that Joel Peebles, Sr., was, in fact, a member of the**

7 **Board of Trustees of Jericho Baptist Church?**

8 MR. MARKS: I'm going to object for the

9 reasons stated previously.

10 MR. MALONEY: Go ahead.

11 MR. MARKS: You may answer if you know.

12 BY MR. MALONEY:

13 **Q Does that raise in your mind that**

14 **possibility?**

15 A Let me say, it's a possibility.

16 **Q All right.**

17 A And that's --

18 **Q All right. Do you agree that it's something**

19 **that you as Chairman of the Board have an obligation**

20 **to investigate and make a determination?**

21 A Possibility, yes.

22 **Q Directing your attention to Paragraph 3 of**

Page 184

1 **the affidavit, "Neither William Meadows nor Anne**

2 **Wesley were elected as successor trustee in**

3 **Resolution 01-09."**

4 **Are you aware that both Ms. Wesley and**

5 **Mr. Meadows have signed affidavits saying that there**

6 **was no meeting and they were unaware of an election?**

7 A I'm not aware of them -- I did see the

8 affidavits. I did see those, uh-huh.

9 **Q Is Joel Peebles, Sr., now effectively the**

10 **face of the church to the congregation and to the**

11 **public?**

12 MR. MARKS: Objection. Calls for

13 speculation.

14 A I'm not aware.

15 BY MR. MALONEY:

16 **Q Well, if he is not, who is the face of**

17 **Jericho Baptist Church, if it's not Joel Peebles,**

18 **Sr.?**

19 MR. MARKS: Objection for the same

20 reasons.

21 MR. MALONEY: Go ahead.

22 BY MR. MALONEY:

Page 185

1 **Q Who is the face of Jericho Baptist Church,**

2 **if it's not Joel Peebles, Sr.?**

3 A You said the face of the church?

4 **Q Sure.**

5 A What are you asking?

6 **Q I'm asking, who is the public persona who**

7 **represents the church to its congregation, to the**

8 **media and to the public?**

9 A Well, I guess it would be Joey.

10 **Q Okay. Directing your attention to Paragraph**

11 **12 --**

12 A Uh-huh.

13 **Q -- of your affidavit, you state in your**

14 **affidavit at that paragraph that "Bobby, Henry, Jr.,**

15 **is a member of the church and previously served as**

16 **legal counsel to the church and Board of Trustees,**

17 **but has not been authorized by the current Board of**

18 **Trustees to act or advise Joel R. Peebles, Sr.,**

19 **regarding the status of the current Board of**

20 **Trustees. He has not inquired of me to ascertain the**

21 **members of the current Board of Trustees."**

22 **Do you know Mr. Henry?**

Page 186

1 A Yes, I do.

2 **Q And was this statement you made in the**

3 **affidavit correct that he had served as legal counsel**

4 **to the church and the Board of Trustees? Is that an**

5 **accurate statement you made here?**

6 A Yes, uh-huh.

7 **Q And is it your testimony that there came a**

8 **time when Bobby Henry, Jr., stopped being the counsel**

9 **to the Board of Trustees?**

10 A Yes.

11 **Q And when was that?**

12 A Back in '0 -- in 2010, we authorized

13 Mr. Marks to give Bobby a letter asking him, you

14 know, not to -- I'm trying to remember what the

15 letter said, but anyway, it kind of put a stop to him

16 acting, you know, for a time as the church counsel,

17 and also as the board counsel.

18 **Q And was that in 2010?**

19 A Yes.

20 **Q And did the board do that as a whole?**

21 A Yes.

22 **Q And who drafted that letter?**

Page 187

1 A That letter was drafted by our attorney --

2 **Q And who is that?**

3 A -- at our permission.

4 **Q And who is that?**

5 A That was Isaac Marks.

6 **Q And when you say "our attorney," the**

7 **attorney for the board?**

8 A For the church and board, yes.

9 **Q And when did Mr. Marks become the attorney**

10 **for the church and the board?**

11 A I can't give you a date, but when I

12 became -- when I came on board as the trustee, he was

13 already on board.

14 **Q So it's your testimony that he was already**

15 **the attorney for the church on March 15th of 2009?**

16 A Yes, he was.

17 **Q And how do you know that?**

18 A Because he was the one there when the school

19 was closed down and by talking to the Apostle.

20 **Q Okay. And what did the Apostle tell you?**

21 A That Isaac was now church counsel.

22 **Q I show you the bottom of Resolution 01-09 on**

Page 188

1 **Page 2, if you go two pages in --**

2 A Uh-huh.

3 MR. MARKS: I'm sorry, which exhibit?

4 MR. MALONEY: Same exhibit, just go two

5 pages in.

6 A Uh-huh.

7 BY MR. MALONEY:

8 **Q Where it says, "F. clients" -- this is in**

9 **the small, 6-point type at the bottom, left, and it**

10 **uses the same client identifier as the other**

11 **documents from the O'Malley firm in this case.**

12 **It states, "F clients, J. Jericho,**

13 **city-appraised documents, corporate resolution,**

14 **resolution of trustees doc."**

15 **Did Mr. Marks prepare this document, which**

16 **is Resolution 01-09 to the Board of Trustees?**

17 A According to my knowledge.

18 **Q Yes.**

19 A Uh-huh.

20 **Q And who authorized, if you know, Mr. Marks**

21 **to prepare the document which is Resolution 01-09 of**

22 **the Board of Trustees?**

Page 189

1 A The Apostle.

2 **Q And was Mr. Henry still the counsel to the**

3 **church and the Board of Trustees at the time that**

4 **this document was prepared?**

5 A He was still on payroll.

6 **Q Well, when you say "on payroll," was he**

7 **receiving a salary from the --**

8 A From the church.

9 **Q From the church?**

10 A Uh-huh.

11 **Q And is the position of counsel a salaried**

12 **position with the church?**

13 A It was a salary for him.

14 **Q All right. Is it still a salaried position?**

15 A No, it's not.

16 **Q All right. Without getting into the details**

17 **of it, is it a position that is being billed and paid**

18 **from the church? I don't want you to get into what**

19 **Mr. Marks is being paid at all right now, but is his**

20 **representation in this case being paid for from**

21 **church funds?**

22 A Yes.

Page 190

1 **Q All right. And who authorized that?**
 2 A The board did.
 3 **Q And with respect to Mr. Henry, when did he**
 4 **stop being authorized to receive a salary from**
 5 **Jericho Baptist?**
 6 A February or March.
 7 **Q Now, was Mr. -- when was the academy closed?**
 8 MR. MARKS: You mean scaled back?
 9 THE WITNESS: Scaled back?
 10 MR. MALONEY: Yes.
 11 A The end of school year '09/'08.
 12 BY MR. MALONEY:
 13 **Q And does it continue to be operated as a K**
 14 **through 5; is that right?**
 15 A At this time, yes.
 16 **Q At the time that it was scaled back from**
 17 **K-12 to K-5, was Mr. Marks acting as the attorney for**
 18 **the church at that time?**
 19 A Yes.
 20 **Q And was Mr. Henry not acting as the attorney**
 21 **for the church at that time?**
 22 A He was still on board.

Page 191

1 **Q So there were two attorneys representing**
 2 **Jericho at that time?**
 3 A That's how the Apostle set it up.
 4 **Q So what role did one have as opposed to the**
 5 **other?**
 6 A I'm not aware of that.
 7 **Q Are there any minutes that exist from any**
 8 **meetings of the Board of Trustees of Jericho from**
 9 **March 15th forward?**
 10 A Yes.
 11 **Q And where are those minutes?**
 12 A Let me say it this way: At the church, and
 13 I think you should have a copy of them because we
 14 compiled all that information for you.
 15 MR. MARKS: Counsel, I'll tell you,
 16 they are on my desk.
 17 THE WITNESS: On your desk.
 18 MR. MALONEY: Are you planning to take
 19 them off your desk and put them on my desk?
 20 MR. MARKS: Absolutely.
 21 MR. MALONEY: When is that going to
 22 happen?

Page 192

1 MR. MARKS: As soon as possible.
 2 BY MR. MALONEY:
 3 **Q Now, with respect to Resolution 01-09, are**
 4 **you familiar with the affidavit signed by Mr. Meadows**
 5 **indicating that he only saw the second page of the**
 6 **document and never saw the first page of the**
 7 **document?**
 8 A I'm not familiar with that.
 9 **Q Do you know the circumstances under which**
 10 **Mr. Meadows did or did not sign Resolution 01-09?**
 11 A I'm not aware of that.
 12 **Q Do you know who presented it to him?**
 13 A I'm not aware of that.
 14 **Q Do you know what was told to Mr. Meadows**
 15 **about the document or the page that he was given to**
 16 **sign?**
 17 A I'm not aware.
 18 **Q Do you know what documents Anne Wesley**
 19 **witnessed or did not witness?**
 20 A I'm not aware.
 21 **Q Was she the secretary of the church on March**
 22 **15th of 2009?**

Page 193

1 A I'm not aware of that.
 2 **Q Did Anne -- is Anne Wesley still active in**
 3 **the church?**
 4 A Yes.
 5 **Q And what role does she play in the church**
 6 **now?**
 7 A She worked with the finances. I think she
 8 is kind of like a finance assistant or something.
 9 I'm not sure of her title, but she is still there at
 10 the church.
 11 **Q Is she a secretary or clerk of the church**
 12 **now?**
 13 A I can't answer that.
 14 **Q Now, we had a number of members of the**
 15 **board, looking at the rest of Tab 36, who resigned,**
 16 **and we've walked through their names, including**
 17 **Jennie Jackson, Norma Lewis, Bruce Landsdowne, and so**
 18 **forth, and they indicated they resigned because of a**
 19 **limit on the number of members in the bylaws.**
 20 A Uh-huh.
 21 **Q What is the -- if there is one, a limitation**
 22 **on the number of members of the Board of Trustees**

Page 194

1 **that is contained in the bylaws?**
 2 A Seven, I do believe.
 3 **Q And where is that contained in the bylaws,**
 4 **if you know?**
 5 A I can't remember what section.
 6 **Q Show you Tab 2 from the binder if you would**
 7 **look at it.**
 8 **Is this the current version of the bylaws of**
 9 **the Jericho Baptist Church, Incorporated?**
 10 A No, it's not.
 11 **Q Is there a more current version that has**
 12 **been adopted?**
 13 A Yes.
 14 **Q And when was that adopted?**
 15 A I'm sorry, it's -- it's in the process of.
 16 **Q Okay. I'm -- I'm not asking about in the**
 17 **process. We'll get to that in a minute.**
 18 A Uh-huh.
 19 **Q The -- so is this the current version that**
 20 **is in place now awaiting the new bylaws that have yet**
 21 **to be adopted?**
 22 **Let me rephrase the question. Until the new**

Page 195

1 **bylaws are adopted, does this remain the current**
 2 **version of the bylaws?**
 3 A I'm not aware of this.
 4 **Q Are you aware of any other version of the**
 5 **bylaws that has already been adopted other than the**
 6 **document which is at Tab 2?**
 7 A Not at -- no, I'm not aware.
 8 **Q Have you ever seen the document before which**
 9 **is at Tab 2?**
 10 A Yes, I have seen this.
 11 **Q All right. So you believe that at one time,**
 12 **this was validly adopted; is that correct?**
 13 A I'm not sure. I have seen this, but I'm not
 14 sure.
 15 **Q Well, do you know of any --**
 16 A I see the signatures. I mean, I don't know.
 17 **Q Do you know of any other document -- have**
 18 **you seen any other version of that document that has**
 19 **signatures or anything else?**
 20 A No, I haven't.
 21 **Q Are you aware of any other document that**
 22 **would constitute the bylaws of Jericho Baptist right**

Page 196

1 **now other than Tab 2's document?**
 2 A Not as bylaws, no.
 3 **Q All right. Is one of the reasons that new**
 4 **bylaws are being considered because the document at**
 5 **Tab 2 is considered not sufficient as a bylaw?**
 6 A This was never considered.
 7 **Q Do you agree that there's nothing in**
 8 **Tab 2 -- in the document which appears at Tab 2 that**
 9 **limits the number of members of the Board of**
 10 **Trustees?**
 11 MR. MARKS: Objection. Again, there's
 12 a presumption for which facts have not been
 13 established that this is the bylaws --
 14 MR. MALONEY: Go ahead. You may
 15 answer.
 16 MR. MARKS: -- or is the bylaws. You
 17 may answer if you know.
 18 THE WITNESS: Could you repeat your
 19 question again?
 20 BY MR. MALONEY:
 21 **Q Do you agree that there's nothing in the**
 22 **document that you're looking at now in Tab 2 which**

Page 197

1 **limits the number of members of the Board of**
 2 **Trustees?**
 3 A No, there isn't.
 4 **Q Well, a number of -- a number of purported**
 5 **trustees resigned in May of 2009 because of an**
 6 **alleged limit on the number of trustees.**
 7 **Where did that idea come from that there was**
 8 **a limit on the number of trustees? Who told you**
 9 **that?**
 10 A I'm not aware.
 11 **Q Have you ever seen any document that**
 12 **purports to limit the number of people who can serve**
 13 **on the Board of Trustees?**
 14 A For Jericho?
 15 **Q Yes.**
 16 A Our bylaws -- the board's bylaws.
 17 **Q You mean, the ones that you're thinking**
 18 **about adopting now?**
 19 A Uh-huh, yes.
 20 **Q But they haven't been adopted yet; correct?**
 21 A Not yet.
 22 **Q Were all of these individuals who resigned,**

Page 198

1 such as Norma Lewis and Ms. Jennie and these other
 2 people, were they told that they had to resign
 3 because of a limitation on the bylaws?
 4 A I'm not aware of that.
 5 Q Well, I'm looking at their resignations --
 6 A Uh-huh.
 7 Q -- which are attached to your affidavit, and
 8 they all say, "Due to limitations in the number of
 9 trustees per the bylaws of the church, I hereby
 10 resign this 27th day of May, 2009."
 11 A I mean, I read that also. You asked do I
 12 know of.
 13 Q Well, I'm asking where this limitation is in
 14 a bylaw that's actually been adopted.
 15 I can't find it. Have you ever seen it?
 16 A I haven't seen adopted bylaws.
 17 Q Who prepared these resignation letters?
 18 A I'm not aware of that.
 19 Q Did you as vice chairman of the board at
 20 that time and a member of the board have any role in
 21 the discussion of these resignations or the
 22 preparation of these resignation letters?

Page 199

1 A No.
 2 Q Who is Clifford Boswell?
 3 A He is one of the Trustee Board members.
 4 (Witness pointing.)
 5 Q Showing you Tab 26, document Resolution
 6 04-09, which purports to appoint Clifford Boswell as
 7 a successor trustee upon the resignation of Dorothy
 8 Williams, Jennie Jackson, Norma Lewis, LaShonda
 9 Terrell and Bruce Landsdowne.
 10 What do you remember about all this
 11 happening?
 12 A I remember seeing a document, but as I said,
 13 the Apostle was, you know, in charge of all this.
 14 Q I take it from your earlier testimony that
 15 Mr. Boswell, who is present here today, remains, in
 16 your view, a member of the Board of Trustees;
 17 correct?
 18 A Yes, uh-huh.
 19 Q Well, was Joel Peebles, Sr., ever given
 20 notice of Resolution 04-09 and an opportunity to
 21 object to Mr. Boswell's appointment to the Board of
 22 Trustees?

Page 200

1 A Not to my knowledge.
 2 Q Was there ever a meeting of the Board of
 3 Trustees called to consider the Resolution 04-09, the
 4 appointment of Clifford Boswell to the Board of
 5 Trustees?
 6 A Not to my knowledge.
 7 Q Was Mr. Peebles -- Joel Peebles, Sr., given
 8 any notice whatsoever of either a meeting or the
 9 proposed resolution or any other opportunity to be
 10 heard on Resolution 04-09, the election of Clifford
 11 Boswell to be a member of the Board of Trustees?
 12 A Not to my knowledge.
 13 Q Now, we went from Resolution 01-09 to
 14 Resolution 04-09.
 15 What happened to Number 2 and Number 3.
 16 A Is that a question for me?
 17 Q Yes.
 18 A I'm not aware of, you know, who compiled
 19 this.
 20 Q How often does the board meet?
 21 A We meet at least monthly.
 22 Q Show you Tab -- and has that been true since

Page 201

1 you were elected to the board in March of 2009?
 2 A Have -- would you please repeat that,
 3 please.
 4 Q Has that been true since you were
 5 purportedly selected to the board in March of 2009?
 6 A When I was elected to the board, basically,
 7 it started after the pastor's passing, so we can kind
 8 of pull things together.
 9 Q Show you -- ask you to look at the document
 10 which is Tab 28.
 11 A Uh-huh.
 12 Q It's a letter from Joel Peebles, Sr., to the
 13 staff at Jericho City at the church.
 14 Do you recall this letter being circulated?
 15 A I wasn't given a copy of this.
 16 Q Do you recall hearing about it?
 17 A I have, yes, uh-huh.
 18 Q All right. And did the -- your group on the
 19 board ever consider this?
 20 A I'm not aware.
 21 Q When this letter was circulated, it was
 22 actually circulated to the staff because the identity

Page 202

1 **of your purported board didn't exist; isn't that**
 2 **correct?**
 3 MR. MARKS: I'm going to object to your
 4 line -- that question, counsel, in the sense that she
 5 has no way of knowing why that was circulated by
 6 someone else.
 7 BY MR. MALONEY:
 8 **Q Well, on the date this was sent, September**
 9 **15th, 2010, Joel Peebles, Sr., had not been told**
 10 **about the purported election of this board 18 months**
 11 **earlier; isn't that true?**
 12 MR. MARKS: Told by whom?
 13 MR. MALONEY: Told by anyone on the
 14 board.
 15 A I'm not aware of -- of it, you know,
 16 personally speaking.
 17 BY MR. MALONEY:
 18 **Q Showing you Tab 29, letter from September**
 19 **21st, 2010, to Joel Peebles signed by Dorothy**
 20 **Williams.**
 21 A Uh-huh.
 22 **Q Saying, "Concerned about the emergency**

Page 203

1 **meeting. I believe calling such a meeting is**
 2 **contrary to her wishes disrespectful of her**
 3 **authority. My last conversation with the pastor, she**
 4 **was competent and in full control and I have no**
 5 **information she authorized the meeting."**
 6 **Did you know about this being sent?**
 7 A Yes, I know of it.
 8 **Q And did you review this before it went out?**
 9 A That letter?
 10 **Q Yes.**
 11 A No, I did not.
 12 **Q Showing you what is Tab 31, Certificate of**
 13 **Corporate Secretary with Anne Wesley certifying that**
 14 **she is the corporate secretary and that the Board of**
 15 **Directors as of September 21, 2010, would be Betty**
 16 **Peebles, Joel Peebles, William Meadows, Dorothy**
 17 **Williams and Anne Wesley as secretary.**
 18 **Do you see that?**
 19 A Yes, I do.
 20 **Q Do you see any reason why this certification**
 21 **is not valid and should not be given full force and**
 22 **effect?**

Page 204

1 A Yes, I do.
 2 **Q And what is that?**
 3 A Because the board that was put together in
 4 Resolution 1-09 and also the documentation where
 5 Meadows and Anne signed themselves off the board.
 6 **Q Showing you what is marked as -- strike**
 7 **that.**
 8 **She states in her letter -- Dorothy**
 9 **Williams -- in the previous letter that she believed**
 10 **that Pastor Peebles -- Betty Peebles -- was fully**
 11 **competent and in control.**
 12 A Uh-huh.
 13 **Q She says, "competent and in full control."**
 14 **How often did you see Betty Peebles during the last**
 15 **year of her life?**
 16 A I did not see her that last year.
 17 **Q And why is it that you did not see her**
 18 **during the last year of her life?**
 19 A Because the number of people that
 20 was -- that see her, I believe, was limited.
 21 **Q Limited by whom?**
 22 A By her.

Page 205

1 **Q And who were those people who were allowed**
 2 **to see her?**
 3 A I don't know. I have no idea.
 4 **Q Well, do you know anyone -- you, yourself --**
 5 **who was allowed to see her in her last year of her**
 6 **life?**
 7 A I know that Denise saw her. I can't tell
 8 you anyone else, but I --
 9 **Q Is Denise Killen the only person on the**
 10 **Board of Trustees -- at least your board group that**
 11 **you're aware of -- who was allowed to see Pastor**
 12 **Peebles -- Betty Peebles in the last year of her**
 13 **life?**
 14 A I'm not aware of that.
 15 THE VIDEOGRAPHER: Excuse me, we're
 16 running out of tape.
 17 MR. MALONEY: We're just going to
 18 change the tape -- take 30 seconds.
 19 MR. MARKS: Is this a good time to take
 20 quick water break?
 21 MR. MALONEY: Sure -- three-minute
 22 break.

Page 206

1 THE VIDEOGRAPHER: This is the end of
 2 volume one, Tape Number 2, in the deposition of
 3 Gloria McClam-Magruder.
 4 Going off the record. The time is 3:35
 5 p.m.
 6 (Whereupon, a recess was held from 3:35
 7 p.m. to 3:47 p.m.)
 8 THE VIDEOGRAPHER: Back on the record.
 9 Here marks the beginning of Volume 1, Tape Number 3,
 10 in the deposition of Gloria McClam-Magruder. The
 11 time is 3:47 p.m.
 12 BY MR. MALONEY:
 13 **Q So other than Ms. Killen, do you know of**
 14 **anyone else who saw Apostle Betty Peebles in the last**
 15 **year of her life?**
 16 A Not to my knowledge.
 17 **Q So as far as Betty Peebles' competency, her**
 18 **ability to make and communicate informed decisions**
 19 **for her own well-being, you don't have any personal**
 20 **knowledge yourself of her condition in that regard in**
 21 **the last year of her life; is that correct?**
 22 A I -- I talked with her via phone.

Page 207

1 **Q How often did you do that?**
 2 A I think overall, about three times.
 3 **Q Do you remember when those calls were?**
 4 A No, I don't remember exactly.
 5 **Q And do you have any opinion of her**
 6 **competency or back of competency in those calls?**
 7 A She was still, you know, Apostle Betty.
 8 **Q Well, do you recall the subject matter of**
 9 **any of those three calls?**
 10 A No, I do not.
 11 **Q Do you recall the month or year of those**
 12 **calls?**
 13 A No, I do not.
 14 **Q Did you ever discuss with Apostle Betty her**
 15 **Last Will and Testament?**
 16 A No, I did not.
 17 **Q Do you know anything about the circumstances**
 18 **surrounding the execution of any Last Will and**
 19 **Testament?**
 20 A The execution?
 21 **Q Yes, the signing of it -- the preparation**
 22 **and signing of it.**

Page 208

1 A No, I do not.
 2 **Q Do you know Betsy Ferguson?**
 3 A Yes, I know Betsy.
 4 **Q Who is Betsy?**
 5 A I want to make sure I get my Betsys correct
 6 now.
 7 Okay. Yes, she works as a receptionist at
 8 the church.
 9 **Q Is she on the church payroll?**
 10 A I assume so. I --
 11 **Q Do you know Dr. Miriam -- Marion Miriam?**
 12 A Who?
 13 **Q Marion Miriam.**
 14 A Marion Miriam?
 15 **Q Yes -- misspelled here -- Miriam Martin?**
 16 MR. MARKS: Miriam Martin.
 17 A Yes, I know.
 18 BY MR. MALONEY:
 19 **Q Who is Miriam Martin?**
 20 A She was a member of the church and also was
 21 the pastor's physician for a while.
 22 **Q Do you know Geneva Boswell?**

Page 209

1 A Yes.
 2 **Q Who is she?**
 3 A She is the wife of Deacon Boswell.
 4 **Q Deacon Boswell who is present with us today?**
 5 A That's correct.
 6 **Q Do you know anything about the circumstances**
 7 **in which Jericho Baptist ceased to be a District of**
 8 **Columbia corporation and became a Maryland**
 9 **corporation?**
 10 A Yes, I do.
 11 **Q Tell me what you know.**
 12 A Because there was not -- most of the
 13 holdings of Jericho was here in Maryland, so
 14 therefore, we at the board thought we just should
 15 have everything here in Maryland --
 16 **Q And when was that -- go ahead.**
 17 A -- and merge the two together.
 18 **Q And who initiated that idea?**
 19 A The board talking about it and realizing
 20 that we did not have any holdings -- or at least, you
 21 know, have that many holdings in Washington, D.C., as
 22 Jericho.

<p style="text-align: right;">Page 210</p> <p>1 Q Does Jericho have any holdings in 2 Washington, D.C.? 3 A I understand that there is a plot of land 4 there. 5 Q And where is that? 6 A I don't know the address of it. 7 Q Were you ever in charge of the Upper Room? 8 A I am presently. 9 Q And how long have you been in charge of the 10 Upper Room? 11 A I do believe since 2001. 12 Q And did you ever serve -- and when did you 13 serve as secretary for Betty Peebles? 14 A Back when we had a very small church there 15 on Douglas Street. 16 Q Were you paid for that or was that a 17 volunteer job? 18 A Volunteer. 19 Q Did there come a time when Betty Peebles 20 became incompetent or not competent? 21 A Not to my knowledge. 22 Q So you think she was competent up to the</p>	<p style="text-align: right;">Page 212</p> <p>1 Q Well, were there ever circumstances in which 2 Apostle Betty Peebles had services that just involved 3 praise, worship and singing and not a formal message? 4 A My pastor -- my Apostle was always teaching. 5 She's a teaching preacher. 6 Q So it's your testimony that there was 7 never -- 8 A As far as I can remember. 9 Q As far as you can remember, there was never 10 a service in which there wasn't just praise, worship 11 and singing? Is that correct? 12 A Yes, as far as I can remember. 13 Q What procedures did Apostle Betty have in 14 place for handling financial reports, if you know? 15 A I'm not aware of what procedures -- 16 Q Uh-huh. 17 A -- but I could just tell from being a member 18 of the church there that all monies was raised and 19 was given to the finance office. 20 Q My question is a little different. 21 A Yeah, I don't -- and I answered that. 22 Q My question is: Did she -- what procedures</p>
<p style="text-align: right;">Page 211</p> <p>1 moment of her death? 2 A Yes. 3 Q And why do you think that? 4 A Because when we have a meeting of the 5 residences, she was on the phone, and that was in 6 September -- October -- excuse me -- and she talked 7 to us at that time. 8 Q How many years were you gone from the church 9 when you were in Alaska or Louisiana or somewhere 10 else? 11 A I was away -- traveling with my husband 12 military -- Jericho is still my home church -- but I 13 left in '84 and returned in '95. 14 Q You expressed some concern earlier about 15 services in which Pastor Joel had only praise and 16 worship and music. 17 How many actual services did you observe 18 that to be the case? 19 A I do believe -- was it two? I'm not sure. 20 Q Is that two out of all the many years that 21 you have seen him in there? 22 A I'm not -- I can't answer that overall.</p>	<p style="text-align: right;">Page 213</p> <p>1 did she have in place to make sure that she received 2 timely financial reports? 3 A I'm not aware of that. 4 Q And with respect to the academy, did you 5 ever resign or were you ever terminated from your 6 position at the academy? 7 A I was not needed anymore. 8 Q And who told you you were not needed? 9 A The pastor -- I mean, the Apostle. 10 Q And when did she tell you that? 11 A April of last year. 12 Q And who did she say that in the presence of, 13 if anyone? 14 A No one. 15 Q Did -- have you ever been a deacon of the 16 church? 17 A Presently. 18 Q And when did you become a deacon? 19 A In 2001, I believe. 20 Q How is this whole dispute going to get 21 resolved, Ma'am? 22 A Excuse me?</p>

Page 214

1 **Q How is this whole dispute going to get**
 2 **resolved?**
 3 A I don't know. I have no idea. Do you have
 4 some suggestions?
 5 **Q Sure. First of all, prayer.**
 6 A Yes.
 7 **Q Okay?**
 8 A Uh-huh.
 9 **Q And discussion.**
 10 A Uh-huh.
 11 **Q Those are two things which always help.**
 12 A True.
 13 **Q The -- did you ever have any discussions**
 14 **with the Apostle Betty about Joel's role and the**
 15 **status as a trustee or director or his role in the**
 16 **future of the church?**
 17 A I never had any discussion with role as a
 18 director or trustee, no.
 19 **Q How about his role in the future of the**
 20 **church?**
 21 A Yes, I have.
 22 **Q Tell me what you recall about that.**

Page 215

1 A She thought that Joel needed more training
 2 in church operation, and also, she felt that he was
 3 not ready to take on the full load without training
 4 and also without mentorship.
 5 **Q When did she tell you that?**
 6 A I don't remember any dates or anything.
 7 **Q Well, how long before she died?**
 8 A There were a couple two years prior.
 9 **Q At any time other than that that you know?**
 10 A Well, we were very close. We had many
 11 discussions.
 12 **Q Did she ever tell you that -- or strike**
 13 **that.**
 14 **Are you familiar with the fact that one of**
 15 **the purported Wills uses the word "tutelage" and**
 16 **requires Joel to obtain, quote, "tutelage" going**
 17 **forward?**
 18 A I'm not familiar with the Wills. I did see
 19 the last one that was sent to me. My name was on it.
 20 **Q Uh-huh.**
 21 A I can't remember the wording on it though,
 22 if that's the one. I'm not sure.

Page 216

1 **Q Are you aware that you were named in that**
 2 **Will?**
 3 A No, I was not.
 4 **Q Did you have any discussion with anyone**
 5 **about that?**
 6 A I was made aware one night that Joey came
 7 into one of our meetings and said to us -- I'm trying
 8 to remember how he said it -- I don't want
 9 to -- something about, you know, "You in the Will,
 10 you in the Will, you in" -- and kind of pointed us
 11 out and said to Deacon Boswell, "Hmmm, you didn't get
 12 your cut, huh?"
 13 So that's when I said, "Huh, I'm in the
 14 Will?" He thought I knew that.
 15 **Q Who said that to you? Who said that to you?**
 16 A Joel.
 17 **Q That you're going to get your cut?**
 18 A No, no, said that to Boswell. He said -- he
 19 pointed to me, "You in the Will, you in the Will, you
 20 in the Will, you in the will," and to Boswell and
 21 Linda Pyles, "You all didn't get your cut."
 22 **Q And did he say that in front of you?**

Page 217

1 A Yes.
 2 **Q And were you offended by that?**
 3 A I don't know whether I was offended --
 4 **Q Uh-huh.**
 5 A -- or I was, you know, surprised, you know.
 6 **Q Has Joel ever said anything else that you**
 7 **thought was inappropriate?**
 8 A Little bit too much sexual connotation in
 9 the messages.
 10 **Q Tell me about that.**
 11 A I mean, you know, I can't remember how he
 12 says those things, you know, but talking to his wife,
 13 you know, and then he would come up with, you know,
 14 sexual kind of connotations, you know. That's a
 15 little offensive to me, and I can't remember the
 16 words.
 17 **Q Talking about he loves his wife?**
 18 A No, no. He doesn't say that he -- I mean he
 19 says that all the time. That's not what I'm talking
 20 about -- that we could do -- I don't know. I can't
 21 put it into words.
 22 **Q These are statements from the pulpit in**

Page 218

1 **front of the congregation?**
2 A These are statements from the pulpit, yes.
3 **Q I'm talking about personal conversations**
4 **with you.**
5 A Oh, personal conversations; no, I can't
6 recall at this time anyway.
7 **Q Ever seen Joel do anything inappropriate in**
8 **terms of his conduct or heard of it?**
9 A With what?
10 **Q Ever seen or heard of Joel doing anything**
11 **appropriate -- or inappropriate in terms of his**
12 **personal conduct?**
13 A I have not seen him, other than getting very
14 angry, I guess, at the meetings, you know, but --
15 **Q Meetings about what's happening at the**
16 **church?**
17 A Yes, and, you know -- but other than that,
18 no.
19 **Q I have seen the board being referred to as a**
20 **"Board of Trustees" or a "Board of Directors." Is**
21 **there a distinction?**
22 A It's Board of Trustees.

Page 219

1 **Q Right.**
2 A Uh-huh. They have been -- wrong word used.
3 **Q How is it that the Complaint happened to be**
4 **served on the same day Joel announced his mother's**
5 **death?**
6 A There was -- I was told -- I was not at the
7 church, but I was told that Joey came through being
8 very demanding talking about firing people if he
9 can't get what he --
10 **Q The information he wanted?**
11 A Yes.
12 **Q That was the information in the September**
13 **1st letter -- the 15th letter?**
14 A Could very well have been, uh-huh.
15 **Q Okay. Go ahead.**
16 A And the board thought to kind of calm down,
17 just asking and walking around being very demanding,
18 that we probably should do something to kind of
19 curtail the action.
20 **Q And that's why the lawsuit was filed?**
21 A So that we can -- yes, so that we can
22 determine, you know.

Page 220

1 **Q Was the board concerned that the lawsuit was**
2 **filed while Betty Peebles was on her death bed?**
3 A We were very much concerned. We were very
4 much concerned.
5 **Q Why did the board decide to do it anyway?**
6 A As I said, to kind of curtail the being
7 demanding and talking about firing folks and all
8 that.
9 **Q Was Betty Peebles consulted about that?**
10 A No, she wasn't.
11 **Q And is that because she was dying?**
12 A I cannot answer that.
13 **Q The -- has the board hired or fired any**
14 **staff since March of 2009?**
15 A We have fired a staff or terminated their
16 services.
17 **Q Who has been fired?**
18 A Bobby Henry.
19 **Q Anybody else?**
20 A Not to my knowledge.
21 **Q Anyone been hired since March of 2009?**
22 A Not to my knowledge.

Page 221

1 **Q Has the board authorized any expenditures in**
2 **excess of \$10,000 since March of 2009?**
3 A In excess of 10,000?
4 **Q Uh-huh.**
5 A Yes, we have.
6 **Q And what is that?**
7 A And that was for the residences.
8 **Q Okay.**
9 A Because of the way the -- the loan -- the
10 loan was guiding, we were kind of like a church,
11 covers it until they get permanent -- a permanent
12 loan.
13 **Q You're talking about the bridge loan; right?**
14 A Yes, uh-huh, right.
15 **Q Has the board authorized any debt other than**
16 **the bridge financing for the residences?**
17 A Not to my knowledge.
18 **Q Who physically handles the money after it's**
19 **picked up in the offerings on Sunday?**
20 A I'm going to have to -- I really can't
21 answer that.
22 **Q You don't know?**

Page 222

1 A I don't know. I mean, I know it goes to the
 2 finance office, but I don't know the procedure. That
 3 probably would be a better question for Dorothy
 4 Williams or Anne Wesley and Jennie.
 5 **Q All right.**
 6 MR. MALONEY: I think that's all I
 7 have. Mr. Marks may have some questions.
 8 MR. MARKS: Let me ask you, I've got
 9 extensive questions, and I'm wondering --
 10 MR. MALONEY: It's your client. I
 11 mean, it's a little unusual for somebody to have
 12 extensive questioning of their client, but if you
 13 want to do it, be my guest.
 14 MR. MARKS: You're such a good
 15 questioner, Tim.
 16 THE VIDEOGRAPHER: Can you put your
 17 microphone on.
 18 MR. MARKS: In light of the hour and
 19 that it's after 4:00 o'clock, I would like to ask if
 20 we break today and then I just start fresh tomorrow,
 21 might help it go along a lot faster.
 22 MR. MALONEY: Well, the trouble is, I

Page 223

1 want to get to our next witness today.
 2 MR. MARKS: I'll tell you, you won't
 3 get to her today.
 4 MR. MALONEY: Well, look, we're going
 5 to use our time here today. It's right now 4:05.
 6 We're either going to use it with you asking
 7 questions of this witness or me asking questions of
 8 the next witness.
 9 If you want to reserve some of your
 10 questioning of this witness for tomorrow, I don't
 11 object, okay? But we're just not going to -- you
 12 guys didn't show up until late. We didn't start
 13 until after 10:00. We had a lunch break which
 14 started at 12:47 and went until well after 2:00 when
 15 we were supposed to come back at 1:30, so we're
 16 burning up time and we're going to finish up all four
 17 of these depositions this week. So the question
 18 is -- I don't want us to be --
 19 MR. MARKS: Not a problem. How long
 20 are you planning to go today?
 21 MR. MALONEY: I'm willing to go until
 22 at least 6:00.

Page 224

1 MR. MARKS: No, can't go after 4:30.
 2 MR. MALONEY: Well, neither you or I
 3 set 4:30 as the time.
 4 MR. MARKS: I can't stay until after
 5 4:30. I mean, we'll work with you on the time.
 6 We're not trying to short you your time by any
 7 stretch, but --
 8 MR. MALONEY: We're going to have to
 9 start early and finish late tomorrow then, if you
 10 want to leave early today, and hold some time the
 11 following day, Thursday.
 12 MR. MARKS: I'm willing to take
 13 advantage of, you know, what time we have left, but I
 14 do need to leave at 4:30. It's 4:06 now I have.
 15 MR. MALONEY: This is the first we've
 16 heard about that.
 17 MR. MARKS: I didn't think we would
 18 be -- we would be going this long anyway, but --
 19 MR. MALONEY: Oh, well, there's a lot
 20 to talk about.
 21 MR. MARKS: Absolutely. That's why I
 22 need to ask some questions.

Page 225

1 MR. MALONEY: Well, go right ahead. If
 2 you want -- I'll leave it up to you and then we'll
 3 start Ms. Killen in the morning as our first witness
 4 and then do the other two later in the day, and if we
 5 don't finish them then, we'll carry over Thursday.
 6 MR. MARKS: Well, I've got to check
 7 with their schedules. I don't know what --
 8 MR. MALONEY: We have to do these now.
 9 We have been putting these off for six months.
 10 MR. MARKS: There is not. There is no
 11 imperative --
 12 MR. MALONEY: I see Mr. Jackson is
 13 shaking his head, and if we have to go to court
 14 tomorrow and present this to the judge, we'll do
 15 this, but we need --
 16 MR. MARKS: Do what you need to do.
 17 MR. MALONEY: We need to get these
 18 depositions done now.
 19 MR. MARKS: I agree. I agree, and
 20 we're willing to work with you on that.
 21 MR. MALONEY: Well, we're here. We
 22 have been on time.

Page 226

1 MR. MARKS: And I appreciate that.
 2 I'll tell you now, I'm not going to finish today and
 3 I'll finish up first thing in the morning what I
 4 don't get done today.
 5 Like I said, we'll work with you to get
 6 these done.
 7 MR. MALONEY: All right.
 8 MR. MAKRS: Nobody is trying to short
 9 you your time here, but things are what they are, so
 10 we --
 11 MR. MALONEY: Let's plan on starting at
 12 9:00 o'clock tomorrow, okay?
 13 MR. MARKS: Does that work for
 14 everybody?
 15 MR. MALONEY: All right.
 16 MR. MARKS: Want to start then or take
 17 advantage of the last--
 18 MR. MALONEY: Take the time now, too.
 19 MR. MARKS: -- twenty-five minutes?
 20 MR. MALONEY: Let's show a little work
 21 ethic here.
 22 MR. MARKS: Okay.

Page 227

1 EXAMINATION BY COUNSEL FOR
 2 PLAINTIFF/COUNTER-DEFENDANT
 3 BY MR. MARKS:
 4 **Q Ms. Magruder, how long have you known Joel**
 5 **Peebles?**
 6 A Almost all his life. I have known him since
 7 he was about five. That's maybe about 30 years, 35
 8 years.
 9 **Q Okay. Early in the deposition, you stated**
 10 **that the pastor told you that she wanted to make sure**
 11 **that her babies' money was protected, and by that,**
 12 **you meant the church's money?**
 13 A Uh-huh.
 14 **Q Why did she have a concern about that money**
 15 **being protected?**
 16 MR. MALONEY: Objection. No
 17 foundation. Go ahead.
 18 A She was concerned that Joey's wife had more
 19 control over him and he would do as she would want
 20 him to do with the money and she was concerned about
 21 that.
 22 MR. MARKS: I'm sorry, if you can mark

Page 228

1 that for me, please.
 2 (Whereupon, Plaintiff's Exhibit A:
 3 Marked for identification.)
 4 MR. MALONEY: Do we have copies of
 5 this?
 6 MR. MARKS: I don't have a copy of
 7 that. I'd be glad if you could have someone make
 8 some copies for us. I'm not going to use it right
 9 away, I'm just getting it marked to get it out of the
 10 way, so --
 11 MR. MALONEY: Let me have those.
 12 Somebody is going to copy them now.
 13 BY MR. MARKS:
 14 **Q I'm sorry, you said that the Apostle had a**
 15 **concern about Joey's wife.**
 16 A Had a concern that Joey's wife had more
 17 control over him and that he would allow her to, you
 18 know, spend up monies.
 19 **Q Did she have any other concerns about Joel**
 20 **Peebles' governance of the church?**
 21 A Well, she was concerned about -- due to what
 22 he did to the school, that was a big thing with her

Page 229

1 at the end, and she was concerned that if he managed
 2 it as he managed the school, that, you know, it would
 3 have many problems.
 4 **Q I'm sorry, let me make sure I'm clear.**
 5 **You're saying that she had concerns that if he**
 6 **managed the church like he managed the academy --**
 7 A Right, uh-huh.
 8 **Q -- there would be problems?**
 9 A There would be problems.
 10 **Q And what was it about his management of the**
 11 **academy that concerned her?**
 12 A The amount of money -- over a million
 13 dollars -- that was -- the school -- the academy was
 14 in the hole.
 15 **Q Do you know if -- do you know who ran up**
 16 **that debt -- the million-dollar-plus debt?**
 17 A The families that came there that was not
 18 paying for their services, and -- and no one was
 19 checking on them and making sure that they paid, or
 20 some were just sent there that Joey allowed in free
 21 of charge.
 22 **Q And do you know what type of expenditures**

Page 230

1 **caused the debt to balloon over a million dollars?**
 2 A Tuition -- majority was tuition. I can't
 3 remember -- and because tuition come in, salaries had
 4 to be paid, so it was tuition, I guess, and salaries,
 5 uh-huh.
 6 **Q Now, let me be clear. During that time**
 7 **frame when the Apostle was considering taking action**
 8 **regarding the academy --**
 9 A Uh-huh.
 10 **Q -- you were not an employee of the academy,**
 11 **were you?**
 12 A No, I was not.
 13 **Q You were not an employee of the church?**
 14 A No, I was not.
 15 **Q In what capacity did you work with the**
 16 **Apostle regarding scaling back the academy?**
 17 A As a church member and a friend.
 18 **Q Did you also provide consulting work?**
 19 A Consulting work; right, uh-huh.
 20 **Q Did you have a contract with her?**
 21 A No, I did not.
 22 **Q Did she pay you after she took action**

Page 231

1 **regarding the school?**
 2 A No, not until the school -- until I was
 3 working directly, you know, facilitating the school
 4 opening for 2009 school year.
 5 **Q So you were volunteering working with her**
 6 **when she was scaling the school back?**
 7 A Yes, I was volunteering.
 8 **Q And when you start -- when she paid you,**
 9 **were you on salary? Did you get a stipend? How did**
 10 **you get paid?**
 11 A A stipend.
 12 **Q How much was that stipend?**
 13 A A thousand dollars a month.
 14 **Q And do you recall what, if any, action the**
 15 **Apostle had running the academy prior to scaling it**
 16 **back?**
 17 A Do I -- repeat that, please.
 18 **Q Do you know if the Apostle had any role in**
 19 **running the academy prior to scaling it back?**
 20 **I know you testified earlier she was an**
 21 **overseer.**
 22 A Uh-huh.

Page 232

1 **Q But did she actually have a role in the**
 2 **day-to-day operations of the church, if you know?**
 3 A As administrator and overseer.
 4 **Q What was Joel Peebles' title at the academy?**
 5 A Headmaster.
 6 **Q And do you know what that entailed?**
 7 A I would say somewhat of like the
 8 superintendent maybe of the school, insuring
 9 day-to-day operations, salaries, you know, how
 10 much -- you know, keeping account of tuition, what's
 11 coming in, what's going out, you know, budget and all
 12 that, I would think.
 13 **Q And to your knowledge, did he do that?**
 14 A Not to my knowledge.
 15 **Q Do you know if Joel Peebles agreed with the**
 16 **Apostle regarding scaling the school back?**
 17 A He wasn't in agreement.
 18 **Q What do you mean by that?**
 19 A Because as I talked with him one day, he
 20 said to me, "This school is going to flourish," if we
 21 could make it through this dry period here, you know,
 22 because he was thinking about getting some

Page 233

1 scholarships or something for football.
 2 **Q Do you know where he was thinking about**
 3 **getting scholarships from?**
 4 A There was a young man that -- I don't know
 5 his name. I can't remember his name -- that said he
 6 had planned to give scholarships the following year.
 7 **Q Do you know how many --**
 8 A For the sports -- for the sports program.
 9 **Q Do you know how much those scholarships**
 10 **were?**
 11 A I don't -- no, I don't. I don't remember.
 12 I don't recall.
 13 **Q Do you recall if Joel Peebles had any**
 14 **opinion regarding the Apostle's efforts to scale the**
 15 **school back?**
 16 A I know he said that that wasn't right, you
 17 know.
 18 **Q Did he say why it wasn't right?**
 19 A I can't recall the complete conversation we
 20 had, but I know he was not in agreement with scaling
 21 back.
 22 **Q Did the Apostle initially start with the**

Page 234	Page 236
<p>1 idea of scaling the academy back?</p> <p>2 A No, she intended to close it. That was her</p> <p>3 intention -- to close it -- but after talking to, you</p> <p>4 know -- back and forth, you know, that she decided</p> <p>5 that she would do from early childhood and K through</p> <p>6 5.</p> <p>7 Q Were you ever in on any meetings between the</p> <p>8 Apostle and Joel Peebles regarding the school?</p> <p>9 A No, I was not.</p> <p>10 Q Was Joel Peebles ever in any of the meetings</p> <p>11 that you had with the Apostle --</p> <p>12 A No, he wasn't.</p> <p>13 Q -- regarding scaling the school back?</p> <p>14 A No, he was not.</p> <p>15 Q How many meetings would you say you had with</p> <p>16 the Apostle regarding scaling the school back?</p> <p>17 A I don't recall, but somewhere between three</p> <p>18 and five meetings.</p> <p>19 Q Let me make sure I'm clear. In working with</p> <p>20 the Apostle, was it your understanding that Joel</p> <p>21 Peebles did or did not have the authority to approve</p> <p>22 expenditures at the -- at the school?</p>	<p>1 Q And do you know why it was subject</p> <p>2 to -- what -- what type of debt it was subject to?</p> <p>3 A She said that Joey had took a loan out on</p> <p>4 the house, a second -- I mean, a mortgage on the</p> <p>5 house.</p> <p>6 Q Do you know if the house had a mortgage when</p> <p>7 it was dedeed to Joey?</p> <p>8 A No, it was paid -- only thing they had to do</p> <p>9 was do taxes.</p> <p>10 Q So it was free and clear of the whole debt?</p> <p>11 A Free and clear, uh-huh.</p> <p>12 Q Do you recall when that house was dedeed to</p> <p>13 Joel Peebles?</p> <p>14 A I don't remember the year. I don't remember</p> <p>15 the date or the year.</p> <p>16 Q Do you recall the time frame between the</p> <p>17 time you were at the meeting when the house was</p> <p>18 dedeed to Joel and the Apostle's concern about the</p> <p>19 foreclosure of the property?</p> <p>20 A No, I don't.</p> <p>21 MR. MARKS: Tim, can I have that</p> <p>22 exhibit?</p>
Page 235	Page 237
<p>1 A I did not understand that at the time. I</p> <p>2 didn't have that understanding at the time.</p> <p>3 Q Did that ever change afterward?</p> <p>4 A I can't recall.</p> <p>5 Q Well, as headmaster, if he was responsible</p> <p>6 for what came in and what went out financially, did</p> <p>7 you have any idea how that million-dollar deficit was</p> <p>8 occurred -- had occurred?</p> <p>9 A According to the documentations, it was</p> <p>10 basically in tuition fees and salaries.</p> <p>11 Q Let me move on and ask you about the</p> <p>12 home -- or the property that the Apostle dedeed to</p> <p>13 Joel Peebles.</p> <p>14 A Uh-huh.</p> <p>15 Q That was her family home?</p> <p>16 A That was a family home, yes.</p> <p>17 Q The home she grew up in in Washington?</p> <p>18 A That's correct.</p> <p>19 Q And you said that property was subject to</p> <p>20 foreclosure?</p> <p>21 A That's what the pastor said to me -- or the</p> <p>22 Apostle said to me.</p>	<p>1 MR. MALONEY: Sure. Somebody is going</p> <p>2 to come in in a minute to get it copied.</p> <p>3 BY MR. MARKS:</p> <p>4 Q Showing you what's been marked as</p> <p>5 Plaintiff's Exhibit 1 -- letter A for identification.</p> <p>6 Can you identify that, please?</p> <p>7 A This is the document that I signed on the</p> <p>8 15th --</p> <p>9 Q On March 15th, 2009?</p> <p>10 A Yes -- becoming a member of the board.</p> <p>11 Q What does that document say?</p> <p>12 A "We, the elected and/or reelected members of</p> <p>13 the Board of Trustees acknowledge our attendance at</p> <p>14 the meeting of the Board of Trustees on the date set</p> <p>15 forth above and by our attendance waive notice of</p> <p>16 said meeting if notice is required."</p> <p>17 Q And who else signed that document?</p> <p>18 A You've got Apostle Betty, Dorothy Williams,</p> <p>19 Clarence Jackson, Jennie Jackson, Denise Killen,</p> <p>20 Bruce Landsdowne, Norma Lewis, Gloria Magruder,</p> <p>21 William Meadows, LaShonda S. Terrell and Anne Wesley.</p> <p>22 Q Who, if anyone, did you see sign that</p>

Page 238

1 trustee acknowledgment?
2 A I don't recall who actually signed while I
3 was in there. I just don't recall.
4 Q And, I'm sorry, you said this was one of the
5 documents that you recall signing --
6 A Yes.
7 Q -- the document with a lot of lines?
8 A That's correct, uh-huh.
9 Q Now, as of March 15, 2009, how did the board
10 operate? Who was the board -- or, I'm sorry, strike
11 that.
12 How were decisions made?
13 A Basically, the Apostle made decisions.
14 Q During the course of a board meeting?
15 A I never attended a board meeting, you know.
16 I didn't know there was a board prior to March 15,
17 2009.
18 MR. MALONEY: I'm sorry, I didn't hear
19 that.
20 A I did not know -- I did not know there was a
21 Board of Trustees prior to March 15, 2009.
22 BY MR. MARKS:

Page 239

1 Q So as of March 15th, 2009, when you became a
2 board member --
3 A Uh-huh.
4 Q -- a trustee, after that, how did -- how
5 were decisions made on behalf of the church?
6 A On behalf of the church?
7 Q Who made the decisions?
8 A Apostle usually make all decisions, you
9 know -- usually the Apostle.
10 Q Uh-huh.
11 A She is the one that basically everyone
12 trusts and believed in her, and she made decisions of
13 the church -- I mean, for the church.
14 Q And if she made decisions, how did you
15 become aware of the decisions?
16 A Sometimes in our meetings on Saturday,
17 deacons -- officers' meetings, and sometimes over the
18 pulpit, and sometimes, just through talking to her.
19 Q She would tell you of decisions that had
20 been made?
21 A What she was thinking -- not decisions that
22 had been made, but decisions she was thinking about.

Page 240

1 Q And were there times that the things she was
2 thinking about became ultimately decisions of the
3 church?
4 A Yes.
5 Q How would you learn of -- that the decision
6 had been made?
7 A Usually, she would put them out over the
8 pulpit usually.
9 Q And is it -- did the board ever have to act
10 on her decision?
11 A I can't recall.
12 Q Is it fair to say that the board would defer
13 to the Apostle in decisions made on behalf of the
14 church?
15 A Yes, that's fair to say.
16 Q After you became a trustee of the church on
17 March 15, 2009, did there come a time that there was
18 a board meeting where another trustee was elected?
19 A Yes.
20 Q And -- and that trustee was Deacon Boswell?
21 A Deacon Boswell, yes.
22 Q And you were asked earlier about other

Page 241

1 actions taken by the board.
2 Do you have all of those actions committed
3 to memory?
4 A No, I do not.
5 Q So is it fair to say that you may not
6 remember everything that was done?
7 A It's fair to say.
8 Q Do you recall any action taken by the board
9 to reduce the grades at the school?
10 A That's right, that was a board -- yeah,
11 there was a board meeting. We all met in the
12 conference room and we -- with the principal, yes.
13 Q Who was the principal?
14 A The principal was -- boy, I can't recall
15 that lady's name.
16 Q Was that Ms. Gill --
17 A Gill, yes -- Ms. Gill. But prior to meeting
18 with Ms. Gill, we did meet as the board and talk
19 about decisions. That's when we talked about not
20 closing the school, but scaling it back, yeah. I
21 forgot all about that, but we did meet and talk about
22 it, and then we also met with Ms. Gill and talked to

Page 242	Page 244
<p>1 her about it.</p> <p>2 Q And was there ever an action taken by the</p> <p>3 board regarding the church's legal name?</p> <p>4 A Yes.</p> <p>5 Q What action was that?</p> <p>6 A To merge the two corporations together, one</p> <p>7 from D.C. to Maryland.</p> <p>8 Q And that took place -- that decision was</p> <p>9 made when?</p> <p>10 A I do believe it was January.</p> <p>11 Q What year?</p> <p>12 A Of -- of this year -- of 2011.</p> <p>13 Q When the merger was authorized or when the</p> <p>14 merger was completed?</p> <p>15 A When it was completed. It was authorized in</p> <p>16 December, actually, and it was completed in January.</p> <p>17 Q Well, let me ask you: Prior to</p> <p>18 that -- prior to the merger, was there ever any</p> <p>19 action taken by the board regarding a change of the</p> <p>20 church's legal name?</p> <p>21 A Yes, it was, because there was another</p> <p>22 church, I think in Hyattsville somewhere, with the</p>	<p>1 title?</p> <p>2 A Vice chairman.</p> <p>3 Q Is it just vice chairman?</p> <p>4 A Trustee, vice chairman.</p> <p>5 Q So you were actually vice chairman of the</p> <p>6 trustee board?</p> <p>7 A Yes.</p> <p>8 Q Not vice president?</p> <p>9 A No, vice Chairman.</p> <p>10 Q But you are vice president of the</p> <p>11 corporation?</p> <p>12 A Yes.</p> <p>13 Q That's Jericho Baptist Church Ministries,</p> <p>14 Inc.?</p> <p>15 A Yes.</p> <p>16 Q Now, you were also asked extensively about</p> <p>17 whether or not it was known publicly about the Board</p> <p>18 of Trustees, and you stated that you didn't know to</p> <p>19 your knowledge if Pastor Peebles made it known</p> <p>20 publicly who the Board of Trustees was; is that</p> <p>21 correct?</p> <p>22 A Yes.</p>
Page 243	Page 245
<p>1 same name as Jericho, and we changed it from "Jericho</p> <p>2 Baptist Church, Inc.," to "Jericho Baptist Church</p> <p>3 Ministries, Inc.," so you could separate the two</p> <p>4 churches.</p> <p>5 Q And that was an action taken by the board?</p> <p>6 A Yes, it was.</p> <p>7 Q Now, you were asked earlier about your role</p> <p>8 as vice president of the board.</p> <p>9 A Uh-huh.</p> <p>10 Q I want to refer you to Exhibit 36.</p> <p>11 A Thirty-six?</p> <p>12 Q Okay? And that's Defendant's Exhibit 2 or</p> <p>13 B, numbers or letters?</p> <p>14 THE WITNESS: C.</p> <p>15 MR. MARKS: C? I'm talking about the</p> <p>16 binder document.</p> <p>17 MR. MALONEY: That's 2.</p> <p>18 MR. MARKS: Okay. You're numbers.</p> <p>19 BY MR. MARKS:</p> <p>20 Q And I refer you to Resolution 1-09.</p> <p>21 A Okay.</p> <p>22 Q Page 1. And under your title -- what's your</p>	<p>1 Q Do you know if members of the church did not</p> <p>2 know you or -- strike that.</p> <p>3 Have you ever been approached by members who</p> <p>4 knew you were on the Board of Trustees?</p> <p>5 A Yes.</p> <p>6 Q And in what way? In what capacity did they</p> <p>7 approach you?</p> <p>8 A Some to find out what's going on with the</p> <p>9 cases -- I mean, yeah, with the cases, and some</p> <p>10 wanted to know what's going to happen, how are we</p> <p>11 going to take care of what's going on in the church</p> <p>12 at this time?</p> <p>13 Q So individuals do know you're a trustee of</p> <p>14 the church?</p> <p>15 A Yes, there are some that no, uh-huh.</p> <p>16 Q And you stated that prior to March 15, 2009,</p> <p>17 you didn't know of a Board of Trustees.</p> <p>18 Who did you believe ran the church?</p> <p>19 A The Apostle.</p> <p>20 Q By herself?</p> <p>21 A Yeah, uh-huh.</p> <p>22 Q You were also asked about</p>

Page 246

1 **reports -- financial reports that you have reviewed**
 2 **or that have been presented to the board and you**
 3 **indicate no reports have been presented to the board;**
 4 **that's correct -- no financial reports? I'm sorry.**
 5 A That's correct, but we talk -- I mean, you
 6 know, we ask those questions, you know, about
 7 the -- the finances, but never a report, but, you
 8 know -- but we did ask. We do talk about it as a
 9 team, you know, in the meetings.
 10 **Q Who do you talk with?**
 11 A Dorothy in the meetings.
 12 **Q Dorothy whom?**
 13 A Williams.
 14 **Q And she's the --**
 15 A CFO -- Finance.
 16 **Q That's Chief Financial Officer?**
 17 A Yes, uh-huh.
 18 **Q And how long has she been the Chief**
 19 **Financial Officer or treasurer of the church?**
 20 A Dot has been there awhile. I don't know
 21 just how long.
 22 **Q Do you have any questions regarding her**

Page 247

1 **integrity?**
 2 A No, I do not.
 3 **Q You were asked about your knowledge of a**
 4 **foreclosure of her home.**
 5 A Uh-huh.
 6 **Q Assuming that's true, would that raise any**
 7 **questions in your mind about her integrity as the**
 8 **Chief Financial Officer of the church?**
 9 A No.
 10 **Q Have you had anything to indicate that she**
 11 **is not capable or competent to serve as Chief**
 12 **Financial Officer for the church?**
 13 A No.
 14 **Q You also were asked if you had received**
 15 **reports about the monies collected from the parking**
 16 **during football games --**
 17 A Uh-huh.
 18 **Q -- adjacent to the church. Have you talked**
 19 **with anyone about the monies or the revenue that was**
 20 **raised?**
 21 A Yes.
 22 **Q Who did you talk with?**

Page 248

1 A Deacon Jackson and Dorothy Williams.
 2 **Q But you've never asked for a report?**
 3 A We are working on -- on procedures now to
 4 get reports, but in the -- in the meantime, they will
 5 kind of discuss it in the meetings.
 6 **Q And, to your knowledge, has the manner in**
 7 **which funds were collected -- has that changed since**
 8 **the Apostle passed in October, 2010?**
 9 A No, it hasn't changed.
 10 **Q Uh-huh. And who is responsible for**
 11 **overseeing the parking and the revenue generated?**
 12 A Deacon Clarence Jackson.
 13 **Q Do you know how long Deacon Clarence Jackson**
 14 **has been serving in that capacity?**
 15 A I don't know exactly how long, but I know he
 16 has been serving while the pastor was here -- I mean,
 17 while the Apostle was still here, uh-huh.
 18 **Q And, I'm sorry, was that before March 15th,**
 19 **2009?**
 20 A Yes, it was before that time; yeah.
 21 **Q And do you have any reason to question**
 22 **Deacon Jackson's integrity?**

Page 249

1 A No, I do not.
 2 **Q His honesty?**
 3 A No, I do not.
 4 **Q Do you trust him to do -- to manage the**
 5 **parking for football games?**
 6 A Yes, I do.
 7 **Q And do you all talk about that?**
 8 A Talk about his managing it or --
 9 **Q About the revenue that's being generated in**
 10 **the whole operation.**
 11 A Yes, uh-huh, usually, they will bring a
 12 report to the meeting, you know, a -- talk at the
 13 meeting.
 14 **Q That's a verbal report?**
 15 A Give an oral report, yes.
 16 **Q Thank you.**
 17 A Uh-huh.
 18 **Q And tell me why it is you have not requested**
 19 **a written report of financial reports, the parking**
 20 **revenue?**
 21 A As I said earlier, we were talking about it
 22 but, you know, coming up with procedures on, you

Page 250

1 know, how to submit the reports, but, you know, I was
 2 satisfied with them coming to the meeting and
 3 sharing.
 4 **Q And you said that procedures are going to be**
 5 **developed --**
 6 A Exactly.
 7 **Q Have you started developing procedures or is**
 8 **that something that's being planned?**
 9 A It's being planned.
 10 **Q And why haven't you done that yet?**
 11 A Well, there's so much to deal with this
 12 litigation and back and forth until -- haven't had
 13 time, actually.
 14 **Q You were also asked about monies that were**
 15 **collected at the church that were not turned in --**
 16 A Uh-huh.
 17 **Q -- and you mentioned Boys Town.**
 18 A Uh-huh.
 19 **Q Was that -- was a collection taken up during**
 20 **church for Boys Town?**
 21 A I think it was selling some wrist bands or
 22 something, coming up with finances or something for

Page 251

1 them.
 2 MR. MALONEY: Can we have that document
 3 here? Thank you, Janice, could you get us five
 4 copies of that.
 5 MR. MARKS: Actually, six. Thank you.
 6 BY MR. MARKS:
 7 **Q I'm sorry, you said there were some wrist**
 8 **bands being sold for Boys Town?**
 9 A I think. Actually, I'm not sure. I don't
 10 want to say because I'm not for sure, but I -- I
 11 wasn't there when the money was taken up. I was not
 12 present that Sunday, so I don't want to say.
 13 **Q Okay. Was there ever any monies raised for**
 14 **a van for Boys Town, to your knowledge?**
 15 A I never actually seen any money raised for a
 16 van.
 17 **Q Or was there ever a request made?**
 18 A I know there was -- it was mentioned from
 19 the pulpit about a van for Boys Town, and that
 20 the -- I want to make sure I get this right -- that
 21 the monies that will be taken up, I guess, during
 22 Family and Friends Day would be used towards that

Page 252

1 purpose. I -- I believe that's what I heard.
 2 **Q And where did you hear that?**
 3 A From the pulpit.
 4 **Q Who said that?**
 5 A I believe it was Joel's wife that said that.
 6 **Q And his wife is named --**
 7 A Yolanda Peebles.
 8 **Q And she made the announcement from the**
 9 **pulpit?**
 10 A Yes.
 11 **Q Was Joel Peebles in the pulpit when she said**
 12 **that?**
 13 A Yes, they were standing up front together.
 14 **Q Is she a minister at the church?**
 15 A No, not to my knowledge.
 16 **Q Does she have authority to collect money on**
 17 **behalf of the church?**
 18 A Not to my knowledge.
 19 **Q But she actually spoke in the mic?**
 20 A Yes.
 21 **Q And when she made the request, did they take**
 22 **up funds at that time?**

Page 253

1 A No.
 2 **Q Have you ever seen Yolanda Peebles make any**
 3 **other request for monies or to collect monies?**
 4 A No, I haven't.
 5 **Q You said that you have seen monies taken up**
 6 **for benevolence.**
 7 A Yes, I have.
 8 **Q What type of benevolence?**
 9 A People that was in need at the church at the
 10 time.
 11 **Q And what happened to the monies that were**
 12 **taken up?**
 13 A I'm not sure exactly what happened. I was
 14 told it did not come to the finance office though.
 15 **Q That was reported to you?**
 16 A That was reported to me.
 17 **Q As chairman?**
 18 A Yes, that --
 19 **Q And you had mentioned the Wednesday night**
 20 **collections are not being turned in.**
 21 A According to the finance officer, they have
 22 not received Wednesday-night offerings for the -- for

Page 254

1 a while now.

2 **Q Did the church previously receive**

3 **Wednesday-night offerings?**

4 A Yes, uh-huh.

5 **Q What, if any, communication have you had**

6 **with Joel Peebles regarding the Wednesday night**

7 **collections?**

8 A A letter was sent to him.

9 **Q What did the letter say?**

10 A I don't remember verbatim, but just letting

11 him know that all monies should be turned into the

12 finance office.

13 **Q How many times have you sent a letter to**

14 **Joel Peebles requesting that monies be turned over to**

15 **the finance office?**

16 A Three times, I do believe.

17 **Q And has he turned monies over after the**

18 **letters were sent?**

19 A Not here lately. When the first one went

20 out, procedural letter, he did, but not here lately.

21 **Q You were also asked about the church's**

22 **filing of 990 tax returns because of its tax-exempt**

Page 255

1 **status.**

2 **Do you know personally that the church is**

3 **required to file a 990 tax return?**

4 A No, I do not.

5 **Q You were also asked about salaries of Denise**

6 **Killen, Clarence Jackson and Dorothy Williams.**

7 **Is that something you would normally commit**

8 **to memory.**

9 A No.

10 **Q Is it available at the church if you wanted**

11 **to look it up?**

12 A I'm almost sure it is, uh-huh.

13 **Q Do you have a concern about the salaries?**

14 A No, I do not.

15 **Q Was there ever a time you knew the amount or**

16 **approximate amount of the salaries that each**

17 **received?**

18 A It was some years ago -- approximate, yeah.

19 **Q And you were also asked about not getting**

20 **financial reports.**

21 A Uh-huh.

22 **Q I'm sorry, strike that. You stated that**

Page 256

1 **following the Apostle's passing, the board came**

2 **together and filed the lawsuit --**

3 A Uh-huh.

4 **Q -- against Joel Peebles and William Meadows,**

5 **and it was because -- well, let me ask: Was it**

6 **solely because he was threatening to fire people?**

7 A According to -- that he wanted paperwork and

8 documents -- financial records -- and wanted to get

9 some offices or something. I don't remember the

10 whole situation, but it -- we believed that probably

11 would have become volatile if we didn't, so we filed,

12 you know, to try to keep some peace until this thing

13 is worked out.

14 **Q To keep him from taking over; is that a fair**

15 **statement?**

16 A Well, that's a fair statement.

17 **Q Who controls the bank accounts for the**

18 **church?**

19 A The CFO and -- the CFO pretty much controls,

20 but the overall, the Board of Directors for the

21 church.

22 **Q Board of Directors or Board of Trustees;**

Page 257

1 **which is it?**

2 A The Board of Directors.

3 **Q Well, let me again refer you to Plaintiff's**

4 **Exhibit A.**

5 A Uh-huh.

6 **Q Is that a -- what type of acknowledgment is**

7 **that?**

8 A Oh, that's a Board of Trustees. I'm sorry.

9 **Q I know it's late.**

10 A It is -- very late -- and I'm getting

11 very -- blood pressure is getting very low, too.

12 **Q You were also asked about the number of**

13 **employees at the church.**

14 **Is that something you commit to memory?**

15 A No.

16 **Q Is that a number at the church that you**

17 **could access if you chose to?**

18 A Yes.

19 **Q Is the number of employees at the church**

20 **important to you for the day-to-day operations?**

21 A They are important for day-to-day operation,

22 yes.

Page 258

1 **Q But you knowing the exact number, is that**
 2 **important to the day-to-day operations of the church?**
 3 A No. No, huh-uh.
 4 **Q Do you have a church credit card?**
 5 A No, I do not.
 6 **Q Do you know anyone who has a church credit**
 7 **card?**
 8 A No, I do not.
 9 **Q You were also asked about whether the board**
 10 **has reviewed the salary and performance of Denise**
 11 **Killen, Clarence Jackson and Dorothy Williams.**
 12 A Uh-huh.
 13 **Q Do you have any concerns about their**
 14 **performance?**
 15 A No, I do not.
 16 **Q Is it your intent to never review their**
 17 **performance?**
 18 A No, it's not my intent to never.
 19 **Q Why has it been delayed?**
 20 A Just haven't had the time with the
 21 litigation and all.
 22 **Q You were also asked to whom do the officers**

Page 259

1 **report?**
 2 A Uh-huh.
 3 **Q And what's your opinion as to whom they**
 4 **report?**
 5 A They report directly to me, actually. But
 6 right now, because I'm not -- we haven't done any
 7 changes or anything yet, they reported directly to
 8 Denise Killen.
 9 **Q And what -- how would you describe the**
 10 **management approach of the church between the**
 11 **officers?**
 12 A I don't know exactly what you mean. I'm not
 13 sure.
 14 **Q Do you direct the officers to take**
 15 **particular actions at the church or do you rely on**
 16 **them to continue doing what they did prior to the**
 17 **Apostle's death?**
 18 **Do you let them make up what they want to**
 19 **do? How -- what's -- how would you describe that?**
 20 A In many cases, I rely on them because I'm
 21 learning, you know, the operation, so in many cases,
 22 I rely upon them.

Page 260

1 **Q You also asked or mentioned that Joel**
 2 **Peebles is the interim pastor.**
 3 **Prior to the Apostle's death, what was his**
 4 **title at the church?**
 5 A Assistant pastor.
 6 **Q Has that title changed?**
 7 A No, it hasn't.
 8 **Q So he has not been installed as an interim**
 9 **pastor?**
 10 A No, he hasn't.
 11 **Q And he has not been installed as the pastor?**
 12 A No, he hasn't.
 13 **Q So is it fair to say he is still the**
 14 **assistant pastor serving on an interim basis?**
 15 A Yes.
 16 **Q You were also asked what the board has done**
 17 **regarding a new pastor.**
 18 **And why hasn't the board done anything?**
 19 A Because we -- in observance of the mourning
 20 period for the pastor -- the Apostle.
 21 **Q Is it important to have a discussion about a**
 22 **new pastor now?**

Page 261

1 A Not at this time.
 2 **Q And when that discussion is had, will**
 3 **procedures be put in place?**
 4 A Oh, yes, procedures will be put in place
 5 prior.
 6 **Q You were asked about the attendance at the**
 7 **11:00 o'clock service, and you stated that it was,**
 8 **quote, "constant," end quote.**
 9 A Uh-huh.
 10 **Q That is based on what?**
 11 A Just my observation.
 12 **Q So you haven't done a count?**
 13 A No, I haven't, just my observation.
 14 **Q And you were asked if the board took any**
 15 **action regarding Joel Peebles preaching at the 11:00**
 16 **o'clock service and that no action was taken.**
 17 **Why was no action taken?**
 18 A Well, I guess, you know, to keep the peace.
 19 **Q When you say "to keep the peace" --**
 20 A Uh-huh.
 21 **Q -- what do you mean?**
 22 A I think -- now, this is just my, you know,

Page 262

1 looking at the whole picture and everything that has
 2 transpired.
 3 I think that -- because even when the
 4 Apostle was changing out ministers, I think Joey got
 5 a little, you know, antsy and did not want the
 6 different ministers to have their Sundays, and we
 7 didn't want to do anything, you know, to cause any,
 8 you know, displeasure, you know.
 9 **Q Well, when you say "displeasure," was the**
 10 **board trying to remove Joel Peebles from preaching?**
 11 A Oh, no, no. No, no.
 12 **Q So the board wanted him to preach?**
 13 A Yeah, we wanted him to preach. We wasn't
 14 trying to remove him. But as I said, you know, I
 15 think he is tired by the second message, and I think
 16 it would be good if we could, you know, have another
 17 preacher -- my saying here -- have another one of our
 18 elders to probably do the 11:00 o'clock service.
 19 **Q So when you say he's tired at the 11:00**
 20 **o'clock service, what do you base that on?**
 21 A As I said earlier, just some of the stuff
 22 that goes on, and sometimes, the lack of giving the

Page 263

1 message and some of the stuff that comes across the
 2 pulpit, and sometimes, the misquotes of scripture.
 3 **Q You said the scripture is misquoted. Does**
 4 **that happen a lot?**
 5 A Some. I won't say a lot, but some.
 6 **Q Have you ever observed individuals in the**
 7 **congregation walk out during the sermon?**
 8 A I have. One lady met me, you know, and
 9 said, "I couldn't take it anymore, I just had to
 10 leave."
 11 **Q What couldn't she take anymore?**
 12 A I think it was some of the -- the
 13 conversation that was going on and some of the antics
 14 that go on there at the church.
 15 **Q What do you mean by "antics"?**
 16 A Talking about the sexual connotation, the
 17 war-cry song, you know -- all those things.
 18 **Q What are the war-cry song?**
 19 A It's a song where people clap and go down,
 20 you know, clap down, up, you know, like a victory
 21 song.
 22 **Q Do you recall the lady's name who told you**

Page 264

1 **she could not take it anymore?**
 2 A I can't remember at this time. I know a lot
 3 of faces.
 4 **Q Has anyone shared with you any other**
 5 **complaints about Joel Peebles' preaching or his**
 6 **sermons or his service?**
 7 A Yeah, I have had quite a few that come and
 8 talk about the service, and we went to church on
 9 Easter Sunday at 10:00. We didn't get out until 2:30
 10 and usually, we go at 11:00 and get out at 2:30, but
 11 we quit early and got out late. You know, somebody
 12 came to me, "Why do we come at 10:00," and I said,
 13 "Oh, you know, just had a long service."
 14 **Q Is that a bad thing -- to start at 10:00 and**
 15 **get out at 2:00?**
 16 A It's kind of long. That's four hours.
 17 That's a long service.
 18 **Q So is that to say there's a question**
 19 **regarding how he manages his service?**
 20 A Yeah. Yeah.
 21 **Q The Sunday services?**
 22 A That's what it was, you know. "Why are we

Page 265

1 coming at 10:00 and leaving out at 2:30 and we could
 2 have been gone." That's what the person said to me.
 3 **Q Earlier, you said that you believed that**
 4 **Joel Peebles was an excellent pastor.**
 5 **I want to understand --**
 6 A I didn't say a "pastor," I said, "preacher."
 7 **Q "Preacher" -- thank you.**
 8 A Uh-huh.
 9 **Q And that is at what point?**
 10 A I said when he studied up and come there in
 11 the fullness of the spirit, he is an excellent
 12 preacher.
 13 **Q Is that to say there are times you believe**
 14 **he preaches a sermon where he is not prepared or**
 15 **ill-prepared?**
 16 A That or -- well, I would guess
 17 ill-prepared -- I don't know -- but I know sometimes,
 18 he don't come across as other times.
 19 **Q I'm sorry, as of what?**
 20 A As other times as we he is really focused.
 21 **Q So it seems that there are certain sermons**
 22 **where he seems unfocused, is that what you're saying?**

Page 266

1 A For lack of a better word right now at the
 2 lateness of the hour.
 3 Q I want to refer you to Defendant's Exhibit
 4 2, and I'm going to go through these quickly,
 5 documents 7 -- which was the Certification of
 6 Organizational Documents and Adoption of
 7 Resolution --
 8 A Uh-huh.
 9 Q -- Exhibit 8 -- I mean, Number 8,
 10 Certification of Organizational Documents and
 11 Adoption of Resolution signed by Betty P. Peebles;
 12 Exhibit Number 9 -- Tab 9, which was the Two-Year
 13 Report for Nonprofit, Foreign and Domestic
 14 Corporations, filed in the District of Columbia --
 15 A Uh-huh.
 16 Q -- signed by Betty P. Peebles. Tab 10,
 17 Certificate of Corporate Resolutions signed by Betty
 18 P. Peebles, among other people. Those Tabs 7 through
 19 10 were not signed solely by Betty P. Peebles.
 20 A Uh-huh.
 21 Q Tab 11, which is also Two-Year Report of
 22 Nonprofit and Foreign Domestic Corporations signed by

Page 267

1 Joel Peebles; Tab 12, which is the Corporate
 2 Resolution to Borrow. It's signed by Betty
 3 P. Peebles, among others; Tab 14, which is a 2006
 4 Two-Year Report of Nonprofit, Foreign and Domestic
 5 Corporations signed by Betty P. Peebles?
 6 A Uh-huh.
 7 Q Tab 17, Unanimous Consent of Directors in
 8 Lieu of Meeting signed by Betty P. Peebles and
 9 others.
 10 A Uh-huh.
 11 Q Tab Number 18, which is the 2008 Two-Year
 12 Report for Nonprofit and Domestic Corporations signed
 13 by Betty P. Peebles.
 14 And of those documents, 7 through Tab 18 as
 15 were indicated, you were asked, does that, in your
 16 mind, does that create a possibility that Joel
 17 Peebles could be a trustee of Jericho Baptist Church
 18 Ministries, Inc.?
 19 A Uh-huh.
 20 Q Now, when you say it's a possibility, do you
 21 mean -- how do you mean that?
 22 Anything is a possibility, some things are

Page 268

1 probability.
 2 Explain to me what you mean by, "It's a
 3 possibility."
 4 And while you think about that, your
 5 testimony was, you were not familiar with any of
 6 those documents?
 7 A I'm not familiar with any of these
 8 documents.
 9 Q Those documents predate your time as a
 10 trustee starting March 15, 2009?
 11 MR. MALONEY: Objection. Leading his
 12 own client. Go ahead.
 13 A Yes, it does.
 14 BY MR. MARKS:
 15 Q Okay. So given that you -- you see the
 16 signatures --
 17 A Uh-huh.
 18 Q -- but you have no idea what those documents
 19 are?
 20 A No, I don't.
 21 Q In light of that, do you believe Joel
 22 Peebles is a trustee?

Page 269

1 A I can't say that, but looking at these
 2 documents, looking at the signatures --
 3 Q Let me ask you, moving on real quick,
 4 looking at Tab 26 --
 5 A Uh-huh.
 6 Q -- I'm sorry, it's Tab 36.
 7 A Uh-huh.
 8 Q I'm going to correct myself once more --
 9 it's Tab 35, Paragraph 26, Page 6.
 10 A Uh-huh.
 11 Q The paragraph where you were asked about
 12 Defendant Joel Peebles and Defendant Meadows
 13 "fulminating discord, disharmony and confusion
 14 throughout the congregation of the church" --
 15 A Uh-huh.
 16 Q -- in that statement in that Complaint. In
 17 your opinion, has the things Joel Peebles said about
 18 this lawsuit been accurate?
 19 A No, because people have come to me and said,
 20 we want to put Joey out of church -- that's what he
 21 said to them. That's not accurate.
 22 And I think someone said from the pulpit

Page 270

1 that we said that Joey is stealing money, and we did
 2 not say Joey was stealing money, we said it was
 3 misappropriated.
 4 **Q Was he on the pulpit when that statement was**
 5 **made?**
 6 A I didn't hear it. I was told that it was
 7 said. I'm not sure.
 8 Also, we're beginning to get people -- I had
 9 someone come to me on Sunday and was very upset and
 10 said that I, you know -- "Shame on you," you know,
 11 and telling me that "You need to stop suing Joey. If
 12 you love his mother as you say you do, then you
 13 wouldn't sue him."
 14 I thought it was very -- especially when it
 15 came from the pulpit, someone on the -- sitting on
 16 the pulpit, the whole time rolling their eyes at me
 17 and then going to walk away from the podium, when
 18 Joey got overwrought with his Mothers Day, mother's
 19 passing, then she is walking away from the podium and
 20 looked at me real evil like and said something to
 21 me -- I didn't know what it was -- but at the end, I
 22 asked her, you know, was there something she needed

Page 271

1 to say to me and she told me that, you know, "Shame
 2 on you."
 3 And I think, you know, it does cause, you
 4 know, animosity and people is beginning to start
 5 approaching, you know, so it's something to be kind
 6 of weary of or watchful of.
 7 **Q What do you tell people when they ask you**
 8 **about the lawsuit?**
 9 A I say to them, "Please pray that there is a
 10 resolution."
 11 **Q You were asked earlier if Joel Peebles is**
 12 **the face of the church.**
 13 A Uh-huh.
 14 **Q Does the church follow the principles of**
 15 **Joel Peebles or the principles of God?**
 16 A Principles of God.
 17 MR. MALONEY: Ridiculous question.
 18 BY MR. MARKS:
 19 **Q Who would you say then is the face of the**
 20 **church?**
 21 A I would think the Apostle is still very
 22 prevalent, but because of the -- Joey being in the

Page 272

1 pulpit --
 2 **Q So, in your mind, people still associate the**
 3 **Apostle as the face of the church?**
 4 A Yeah, they still do that, uh-huh.
 5 **Q You were also asked about the resignations**
 6 **of Bruce Landsdowne, Norma Lewis and LaShonda**
 7 **Terrell.**
 8 A Uh-huh.
 9 **Q Were you involved in their -- the request or**
 10 **receipt of their resignations?**
 11 A No, I was not.
 12 **Q Aside from their written resignation, do you**
 13 **know anything about their resignation?**
 14 A No, I do not.
 15 **Q That's not something that you were involved**
 16 **in?**
 17 A No, I was not.
 18 **Q So you knew about their resignation from**
 19 **their resignation letter only?**
 20 A From their letter, yes.
 21 **Q You were asked if you were ever terminated**
 22 **from Jericho Christian Academy, but you were not a**

Page 273

1 **salaried employee?**
 2 A I was not.
 3 **Q You were a consultant --**
 4 A Yes.
 5 **Q -- and the work ended?**
 6 A Yes.
 7 **Q You indicated that the Apostle felt that**
 8 **Joey needed additional training --**
 9 A Uh-huh.
 10 **Q -- and mentorship?**
 11 A Uh-huh.
 12 **Q Was that based on particular incidents?**
 13 MR. MALONEY: I'm going to object.
 14 That's what she said he needed.
 15 MR. MARKS: You may answer if you know.
 16 MR. MALONEY: She said training,
 17 mentorship and organization.
 18 A But also, his mother said that, also, that
 19 he wasn't ready yet, he need -- he needed the
 20 training and needed some mentorship.
 21 BY MR. MARKS:
 22 **Q So those words you used came from the**

Page 274	Page 276
<p>1 Apostle; is that correct?</p> <p>2 A Yes. She didn't say organization, I said</p> <p>3 that. I added that.</p> <p>4 Q And what was that based on?</p> <p>5 A Just looking at the services and also the</p> <p>6 academy and what happened there, and that's pretty</p> <p>7 much it.</p> <p>8 Q You were also asked if Joel Peebles had ever</p> <p>9 said anything that was inappropriate.</p> <p>10 Were your comments limited to just church</p> <p>11 service or outside of church service or both?</p> <p>12 A I think it was -- it said personal and I</p> <p>13 said -- or did I know of any inappropriate ones, and</p> <p>14 I said, "Not really," but in the meetings -- and in</p> <p>15 our board meetings when Joey came.</p> <p>16 Q What took place at board meetings? What was</p> <p>17 said?</p> <p>18 A When Joey came to board meetings, he was</p> <p>19 pretty agitated, angry.</p> <p>20 Q What, if anything, would he say?</p> <p>21 A Let me see can I remember. I think it was</p> <p>22 about the breach of security to the gym, and he got</p>	<p>1 A Yes, he did, uh-huh.</p> <p>2 Q Is he actually authorized to give anyone a</p> <p>3 key to the gym?</p> <p>4 A No, he's not authorized.</p> <p>5 Q Did he say why he gave his son a key to the</p> <p>6 gym?</p> <p>7 A I don't think he said -- "Yes, I gave him</p> <p>8 the key," you know, something to that effect.</p> <p>9 Q So he acknowledged giving his son the key?</p> <p>10 A Yes.</p> <p>11 MR. MARKS: I think that's enough for</p> <p>12 one night.</p> <p>13 MR. MALONEY: Are you telling me that's</p> <p>14 all the time you have today?</p> <p>15 MR. MARKS: Well, I held over.</p> <p>16 MR. MALONEY: We'll resume with</p> <p>17 Redirect tomorrow of you and then we will begin with</p> <p>18 Ms. Killen and Mr. Jackson.</p> <p>19 So 9:00 o'clock probably.</p> <p>20 MR. MARKS: Probably.</p> <p>21 MR. MALONEY: What do you mean</p> <p>22 "probably"? We are all going to be here at 9:00</p>
Page 275	Page 277
<p>1 very upset because we thought -- he thought we was</p> <p>2 picking on his family members.</p> <p>3 I said, "No, we're not picking on your</p> <p>4 family members, it's just a breach of security when a</p> <p>5 young person goes into the gym and not knowing the</p> <p>6 code and the police have to come."</p> <p>7 Q Back up, if you would. What are you</p> <p>8 referring to when you talk about a breach of security</p> <p>9 of the gym? What happened?</p> <p>10 A Oh, his young son went into the -- Joey gave</p> <p>11 his young son the key to the gym.</p> <p>12 The young son did not know -- or did not</p> <p>13 remember the code, and he was not able to cut the</p> <p>14 code off and the security system off, and the police</p> <p>15 had to come.</p> <p>16 Q How old is his son?</p> <p>17 A I think around 16, and we just wanted to say</p> <p>18 to him, you know, about security, and a young person</p> <p>19 should not have the key to go in that gym themselves,</p> <p>20 and he got very upset.</p> <p>21 Q He -- did he believe he was entitled to give</p> <p>22 his son the key to the gym?</p>	<p>1 o'clock tomorrow.</p> <p>2 THE VIDEOGRAPHER: Here marks the end</p> <p>3 of Volume 1, Videotape Number 3, the deposition of</p> <p>4 Gloria Mc-Clam Magruder.</p> <p>5 Going off the record. The time is 5:12</p> <p>6 p.m.</p> <p>7 (Signature having not been waived, the</p> <p>8 deposition of GLORIA McCLAM-MAGRUDER, Ph.D., was</p> <p>9 concluded at 5:12 p.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Page 278

1 ACKNOWLEDGMENT OF DEPONENT
2 I, GLORIA McCLAM-MAGRUDER, Ph.D., do hereby
3 acknowledge that I have read and examined the
4 foregoing testimony, and the same is a true, correct
5 and complete transcription of the testimony given by
6 me and any corrections appear on the attached Errata
7 sheet signed by me.
8 _____
9 _____
10 (DATE) (SIGNATURE)
11 At _____ in said County of
12 _____, this ___ day of _____, 2011,
13 personally appeared GLORIA McCLAM-MAGRUDER, Ph.D.,
14 and he/she made oath to the truth of the foregoing
15 corrections by him/her subscribed.
16
17 Before me, _____, Notary Public.
18 My Commission Expires: _____
19
20
21
22

Page 279

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2 I, Sue A. Terry, RPR/CRR/CLR, the
3 officer before whom the foregoing proceedings were
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of the
6 proceedings; that said proceedings were taken by me
7 stenographically and thereafter reduced to
8 typewriting under my supervision; and that I am
9 neither counsel for, related to nor employed by any
10 of the parties to this case and have no interest,
11 financial or otherwise, in its outcome.
12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this ___ day of
14 _____, 2011.
15 My Commission Expires:
16 10-30-2013
17 _____
18 Notary Public in and for the State of Maryland
19
20
21
22

Page 280

1 E R R A T A S H E E T
2 IN RE: Board of Trustees of the Jericho Baptist
3 Church Ministries, Inc., v. Joel R. Peebles, Sr., et
4 al.,
5 RETURN BY:
6 PAGE LINE CORRECTION AND REASON
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 (DATE) (SIGNATURE)

Page 281

1 E R R A T A S H E E T (Continued)
2 IN RE: Board of Trustees of the Jericho Baptist
3 Church Ministries, Inc., v. Joel R. Peebles, Sr., et
4 al.,
5 RETURN BY:
6 PAGE LINE CORRECTION AND REASON
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 (DATE) (SIGNATURE)

A			
ability 177:10 206:18	actions 172:19 178:17 241:1,2 259:15	affiliates 146:18	166:7,11,13,17,18,19 167:1
able 21:17 106:15,17 275:13	active 20:19,22 193:2	affirm 161:9 164:8	American 101:17
Absolutely 66:16 191:20 224:21	actual 211:17	affixed 279:13	amount 36:22 81:22 82:2 117:18 127:9 229:12 255:15,16
academy 23:4 24:11 61:17 62:5,12 168:16 169:5,9,15,17 172:8 172:20 174:18 175:5 175:9,15 176:3,6 178:12 190:7 213:4,6 229:6,11,13 230:8,10 230:16 231:15,19 232:4 234:1 272:22 274:6	add 80:18	afford 173:16	and/or 153:14 237:12
access 257:17	added 274:3	afternoon 36:3 130:19	angry 218:14 274:19
accommodate 8:8	additional 80:18 96:1 96:5 273:8	afterward 235:3	animosity 271:4
account 75:12 79:22 80:14,19 84:11 232:10	address 7:11 63:16,19 210:6	age 70:2,3,9,9,10	Anne 43:20 44:6,12 132:11,16,22 140:8,9 140:10 141:4 142:2 142:17 143:1 147:16 148:13 149:9 150:3 150:19,21 151:1 152:10,11 153:14 155:10 156:14 157:8 184:1 192:18 193:2,2 203:13,17 204:5 222:4 237:21
accountant 84:3,8	adjacent 247:18	ago 21:19 28:6 32:3 36:8 80:4 82:19 255:18	announce 110:14 111:16
accountants 89:11	administrates 105:17	agree 153:20 183:18 196:7,21 225:19,19	announced 110:6,11 110:21 219:4
accounts 79:18 256:17	administration 13:3 13:11,12,14 14:6,11 31:10 54:15 121:13	agreed 232:15	announcement 110:16 252:8
accurate 186:5 269:18 269:21	administrative 14:1 109:6,16	agreement 142:16 232:17 233:20	annual 83:3 87:10 88:8 95:8 120:17,19 121:1 125:17 126:19 127:4
acknowledge 237:13 278:3	administrative-level 14:20	ahead 27:11 36:21 39:14 45:12 46:3 58:18 62:19 64:4 67:8 84:17 86:21 90:13 94:1 111:12 112:9 133:21 137:20 139:21 154:7 163:18 164:4 178:7 181:2 183:10 184:21 196:14 209:16 219:15 225:1 227:17 268:12	annually 95:2
acknowledged 276:9	administrator 232:3	aid 173:6 174:13,16	answer 28:7 38:7 39:14 40:9 41:10,16 45:11 46:4,19 48:7 49:4,22 51:1 55:12 59:10 60:9 67:5 68:12 78:4,15 79:1,5 85:20 86:18,21 87:6 90:3,12 93:22 104:15 108:1,11 111:13 112:1 129:17 132:8 133:22 135:1 139:22 154:5,15 160:9 163:8 163:19 165:7 168:7 168:10 176:11,14,19
Acknowledgement 5:11	admitted 173:17 174:12	aided 69:22	
acknowledgment 238:1 257:6 278:1	adopt 41:20 80:14 142:15 153:15,18	Akim 3:16 6:11	
act 185:18 240:9	adopted 45:2 132:17 158:6 194:12,14,21 195:1,5,12 197:20 198:14,16	al 1:11 6:6 280:4 281:4	
acting 74:4 119:20 186:16 190:17,20	adoption 133:6 135:7 154:20 158:5 266:6 266:11	Alaska 16:18 17:12,14 17:16 211:9	
action 41:4 50:6,20 51:9 60:14 86:14 87:21 115:9,12,15 118:9 125:12,15 129:11,12 162:6 163:1 219:19 230:7 230:22 231:14 241:8 242:2,5,19 243:5 261:15,16,17	adults 47:16	alleged 197:6	
	advantage 224:13 226:17	allotment 99:14	
	advise 78:4 79:1 185:18	allow 36:11 228:17	
	advised 48:3 80:5	allowed 154:12 173:5 174:12,15 205:1,5,11 229:20	
	advising 78:15 176:13	altar 120:4	
	affidavit 131:10,16,18 131:19 160:8,13 162:5 179:22 184:1 185:13,14 186:3 192:4 198:7	Amended 159:12 161:4	
	affidavits 184:5,8	America 79:4,9,11 96:21 142:16 165:22	

178:8 183:11 193:13 196:15,17 211:22 220:12 221:21 273:15 answered 106:8 181:1 212:21 Answers 26:15 antics 263:13,15 antsy 262:5 anybody 33:22 165:13 220:19 anymore 213:7 263:9 263:11 264:1 anyone's 139:20 151:8 anyway 173:17 186:15 218:6 220:5 224:18 Apartments 155:9 158:4 Apostle 24:18,18,22 25:10,11,13 29:10,10 30:9,22 32:9 37:7 39:9,17,20 43:3 45:13,17 53:1 55:8 56:10,16,20 57:12 59:12,22 63:7 66:4 81:17 92:19,20 93:1 94:5,6 105:12,13 110:1,22 113:4 118:4 125:22 128:9,11 150:3 151:15 152:14 161:22 162:2,6,20,22 169:6 170:15 176:2,6 176:7,20 177:5,6,16 187:19,20 189:1 191:3 199:13 206:14 207:7,14 212:2,4,13 213:9 214:14 228:14 230:7,16 231:15,18 232:16 233:22 234:8 234:11,16,20 235:12 235:22 237:18 238:13 239:8,9 240:13 245:19 248:8 248:17 260:20 262:4 271:21 272:3 273:7	274:1 Apostle's 31:3,9,13 61:12 233:14 236:18 256:1 259:17 260:3 appear 49:1,6 142:10 143:15 148:9 149:5 155:16 156:10 278:6 appeared 167:9 278:13 appearing 135:8 appears 117:6 142:4 142:12,20 143:14,17 147:13,18 148:7,10 149:7 155:19 158:15 196:8 appoint 38:6 199:6 appointed 37:15 38:14 41:14 44:7,20 49:19 appointing 37:9 appointment 38:11 41:20 45:2,6,7,18 46:14 110:4 199:21 200:4 appointments 42:7 appreciate 226:1 approach 245:7 259:10 approached 245:3 approaching 271:5 appropriate 218:11 approve 234:21 approximate 255:16 255:18 April 23:7,13,19,21 25:3,15 146:16 160:2 160:8,12 213:11 Army 18:21,22 19:15 19:22 arrangement 24:15 127:2 128:8 arrangements 126:15 ascertain 185:20 Aside 272:12 asked 8:4 24:19,22 28:9 29:10 30:6,8,21	31:5 32:11 37:7 46:5 65:16 71:13 93:15 95:11,14 116:2 127:13 134:17 139:3 162:8,11,13 171:13 172:22 178:3 198:11 240:22 243:7 244:16 245:22 247:3,14 248:2 250:14 254:21 255:5,19 257:12 258:9,22 260:1,16 261:6,14 267:15 269:11 270:22 271:11 272:5,21 274:8 asking 29:18 56:3 57:4 67:17 95:18 115:18 116:10 117:16 136:12,13 138:2 160:22 162:9 163:9 170:19 172:12 185:5 185:6 186:13 194:16 198:13 219:17 223:6 223:7 asks 180:21 assemble 163:2 assembled 162:21 asserting 121:7 assess 93:11 Assessments 157:5,13 assist 26:21 assistance 17:22 34:11 assistant 14:2,15 18:14 19:13 20:4 98:6,14 112:21 113:8 120:8,10 178:4 179:12 193:8 260:5 260:14 associate 272:2 associated 87:22 association 87:11 assume 41:21 208:10 assumed 37:12 assumes 163:17 Assuming 247:6	attached 198:7 278:6 attempting 178:12 attend 10:4 attendance 12:20 114:9 116:7,7 117:5 237:13,15 261:6 attended 10:7 72:18 238:15 attention 148:4 155:6 157:3 159:16 183:22 185:10 attest 180:20 attestation 140:8 152:11 attested 141:1 attesting 167:22 180:15 attorney 131:19,20 187:1,6,7,9,15 190:17,20 attorneys 191:1 audit 94:11,15,19 95:5 audits 94:14 95:1,8,12 95:15,18 August 19:18 24:2 authentic 134:11 155:13 156:18 authenticity 133:16 134:5,18 135:6 139:16,19 142:8 143:4 147:20 148:17 authority 80:8,10,14 163:1 165:13,15,17 166:12 168:2 177:6 177:21 178:4 203:3 234:21 252:16 authorize 178:5 179:6 authorized 142:15 177:15 185:17 186:12 188:20 190:1 190:4 203:5 221:1,15 242:13,15 276:2,4 authorizing 177:19 available 82:5,6,9 255:10
--	--	--	--

<p>averaging 81:2 awaiting 194:20 aware 38:8,10 41:6,7 41:13,17,19 44:10,14 44:17,18,22 45:1,4 46:20,21 47:4 50:1 51:10 59:19,21,22 60:2 61:15 65:3 78:21 79:18 87:12,14 94:13,14,17 99:20 100:5,13,20 101:1,13 101:16 102:4,5,14,15 102:19 103:1,4,8,10 103:12,14,17,19 104:7,19,21 108:2,12 109:14,17 110:3,9,13 111:2 112:2 115:1,4 115:8 117:21 121:6 123:13 125:16 126:10,22 127:17 128:1,5,9,17,19 129:1,5,10,21 132:18 133:18 134:2,7,9 136:13 137:3,4,11,13 137:16,21 138:4,9,21 139:1,2 140:2,6,17 141:4,9,11,14 143:21 143:22 145:3,14 146:8 150:1,17 151:9 153:12,16,17,21 154:8 155:1,2,4,12 155:15 156:1,4,19 157:2,15,16,20 158:1 158:18 159:3,8 163:11,12,20 164:5 164:19 165:2 166:9 166:20 167:2,6,11,19 168:11 172:13 173:18 174:2,2,14,17 175:10,13 176:20,21 177:2,3,13,18 178:9 178:14 182:14,15,19 184:4,7,14 191:6 192:11,13,17,20 193:1 195:3,4,7,21</p>	<p>197:10 198:4,18 200:18 201:20 202:15 205:11,14 212:15 213:3 216:1,6 239:15 awareness 138:2 awhile 246:20 a.m 1:19 6:10 97:10,12</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>B 243:13 babies 34:17,22 61:13 62:6 227:11 baby 34:18 back 13:11,18 19:10 21:15 23:15 40:1 46:8 64:3,3 67:14 69:21 70:16,18 74:14 75:11 97:13 130:5,16 146:11 152:8 168:19 169:1,19 170:1 172:9 174:19 186:12 190:8 190:9,16 206:8 207:6 210:14 223:15 230:16 231:6,16,19 232:16 233:15,21 234:1,4,13,16 241:20 250:12 275:7 background 9:9,10 109:15,17 bad 264:14 balloon 230:1 ballpark 20:17 bands 250:21 251:8 bank 79:3,8,10,15,18 79:22 80:14 96:21 142:16 165:22 166:7 166:10,13,19,22 256:17 banking 166:13,16,22 Baptist 1:4 6:5 22:16 28:22 85:5,6 94:12 94:16 95:22 136:21 143:19 155:21 156:22 157:11,18,18</p>	<p>158:6 159:5 166:16 180:18 183:7 184:17 185:1 190:5 194:9 195:22 209:7 243:2,2 244:13 267:17 280:2 281:2 base 7:16 262:20 based 52:11 71:12 158:22 159:2 162:2,4 162:5,6 166:2 168:1 180:5 261:10 273:12 274:4 basement 103:18 basically 8:21 16:21 33:9 92:15 96:9 135:16 144:7 177:6 201:6 235:10 238:13 239:11 basis 82:16 83:3 90:2 90:11 93:21 107:22 108:10,16,20 109:5 109:11 111:22 112:7 112:15 129:16 135:22 136:10 137:19,22 139:19 260:14 bearers 71:2 bears 141:20 becoming 41:2 121:9 121:10 150:20 237:10 bed 220:2 began 16:13 beginning 83:13 97:14 206:9 270:8 271:4 begins 6:2 152:7 behalf 3:2,8 239:5,6 240:13 252:17 belief 161:12 believe 12:2,6 16:4 20:18 23:6 25:19 31:20 36:3 40:16 47:5 56:19 57:19 58:7,8 68:22 74:4,12 75:22 97:18 98:1,4</p>	<p>99:5 100:7 109:9 126:17 136:6 152:6 152:13 159:6 160:4 161:20 162:1,12 194:2 195:11 203:1 204:20 210:11 211:19 213:19 242:10 245:18 252:1 252:5 254:16 265:13 268:21 275:21 believed 52:21 58:3 138:13 140:20 149:20 150:19 151:3 204:9 239:12 256:10 265:3 Bell 47:19 Beltsville 3:4 Belvoir 19:11 benevolence 76:11 253:6,8 benevolent 75:10 best 52:3 107:4 115:17 115:22 116:4 161:11 Betsy 208:2,3,4 Betsys 208:5 better 71:5 222:3 266:1 Betty 24:18,22 25:13 30:9 32:9 50:4,13 51:11 53:6 54:3,7 55:8 57:8 59:22 81:18 109:22 110:1,7 113:4,12 119:7 133:8 136:19 137:13 139:13 141:20 142:1 142:10,16,22 143:13 147:15,17,18 148:7 148:11 149:5,9 150:3 152:9,15 153:13 155:10,16 156:7,13 157:7 170:4 177:16 180:15,20 183:3 203:15 204:10,14 205:12 206:14,17 207:7,14 210:13,19</p>
---	--	--	--

212:2,13 214:14 220:2,9 237:18 266:11,16,17,19 267:2,5,8,13 Bible 121:20 123:8,10 123:14,20 big 66:17 68:6 228:22 billed 189:17 binder 5:10 130:22 131:3,4 194:6 243:16 birth 9:6 bit 9:8 48:20 70:1 124:20 169:1 217:8 biweekly 82:16 Black 5:10 BlackBerry 33:21 34:1 blockades 74:18 blood 257:11 blue 30:18 board 1:3 6:4 21:21 22:9,12 28:20 29:1,8 29:13 30:6 32:14,18 32:19,22 33:2,5,15 33:17 34:6,9,13,15 37:10 38:5,12,13,15 39:1,4,18 40:3,4,7 41:1,5 44:5,7,10,11 45:2,6 47:5,14,17 48:4,6,8,18,22,22 49:2,11 50:15,21 51:5,5,9,10,13,17 52:10,20,21 53:6,17 55:9,14 56:5 57:13 57:19 58:4,14,15,20 59:4,20 60:11,16 61:2 71:15,18,20,21 78:7,10 81:13 82:2,9 82:20 84:13,15,18 86:13 87:3,10,21 88:3,7,16,17,20 89:5 89:8,18 90:16 91:9 91:12,14,21 92:3,4,8 92:12 93:2,6,16 94:3 94:20 95:7,11,14,18	95:20 96:21 97:19,20 100:12,15,16 101:4,4 101:8,8,12,14 102:7 102:11,13 103:6 104:2,14 106:17 107:13 108:4,5,14,17 115:9,12,15 117:11 118:3,17 119:4,11,15 119:20 120:4 121:5 121:10,10 124:16 125:12,15,16 126:4,9 126:12 128:2,15,18 129:3,6,11,12,19,20 132:14 137:4 138:6 138:10 140:5,20 141:13 144:3,6,11,15 144:15,20 145:10,15 146:4,5,10,13,21,22 147:3 148:5 151:2,7 153:13 154:10,16,21 158:6,16 159:6 160:5 161:22 162:6,10,12 162:15,16,17,21 163:1,2,4,6,10,15 164:1,9,12,13,14,15 165:13,16,18,20,22 166:3,17,18 167:5,13 167:15,18,20 168:2 172:7,11,13 179:19 180:3,4,10,17 181:6 181:20 182:4,13 183:7,19 185:16,17 185:19,21 186:4,9,17 186:20 187:7,8,10,12 187:13 188:16,22 189:3 190:2,22 191:8 193:15,22 196:9 197:1,13 198:19,20 199:3,16,21 200:2,4 200:11,20 201:1,5,6 201:19 202:1,10,14 203:14 204:3,5 205:10,10 209:14,19 218:19,20,20,22 219:16 220:1,5,13	221:1,15 237:10,13 237:14 238:9,10,14 238:15,16,21 239:2 240:9,12,18 241:1,8 241:10,11,18 242:3 242:19 243:5,8 244:6 244:17,20 245:4,17 246:2,3 256:1,20,22 256:22 257:2,8 258:9 260:16,18 261:14 262:10,12 274:15,16 274:18 280:2 281:2 boards 146:17 board's 86:17,20 110:4 197:16 Bobby 3:18 47:18,18 185:14 186:8,13 220:18 body 33:6 34:11 Bonwood 7:13 books 94:11 Borrow 148:2 267:2 borrowing 166:12 Boswell 3:20 39:10 77:9 97:21 98:15 199:2,6,15 200:4,11 208:22 209:3,4 216:11,18,20 240:20 240:21 Boswell's 199:21 bottom 140:7 149:6 156:6 187:22 188:9 bounced 171:1 bound 8:14 boy 241:14 boys 76:10,10 122:7,7 250:17,20 251:8,14 251:19 breach 274:22 275:4,8 break 8:7 27:19 97:4 99:18 205:20,22 222:20 223:13 bridge 221:13,16 briefly 7:18 bring 249:11	brought 176:21 Bruce 43:2 52:13 193:17 199:9 237:20 272:6 bucket 77:1 buckets 77:2 budget 173:20 174:1 232:11 building 13:3,12,13 14:6,11 31:10 54:15 burning 223:16 business 10:6,7 11:4 buy 62:19 buying 147:6 bylaw 196:5 198:14 bylaws 39:6 51:7 52:12 60:18 193:19 194:1,3,8,20 195:1,2 195:5,22 196:2,4,13 196:16 197:16,16 198:3,9,16
			C
			C 3:1 5:1 6:1 243:14 243:15 CAL 1:9 6:8 calendar 84:20 89:2 120:17,19 121:1 call 25:8 35:15 54:6 164:11 called 24:19,22 32:11 32:12 38:9,13 39:21 41:19 54:8 64:6,8 65:12 152:14 155:7 161:22 169:6,7 170:10 200:3 calling 203:1 calls 51:6 106:9 133:17,19 134:21 184:12 207:3,6,9,12 calm 219:16 Calverton 3:6 capable 247:11 capacity 73:7 129:9 230:15 245:6 248:14

card 101:18,21 102:22 258:4,7	51:21 60:13 81:13 82:1 88:15 90:16	169:13 174:11	215:2 218:16 219:7
cards 102:16,18	91:21 92:12 104:13	children's 36:13	221:10 228:20 229:6
care 175:6 245:11	145:17,20 146:5,10	chose 257:17	230:13,17 232:2
career 16:22 100:21 101:2	146:12 154:10	Christian 22:1 168:16 169:5 272:22	239:5,6,13,13 240:3 240:14,16 242:22
Carolina 9:12,19	183:19 198:19 244:2 244:3,4,5,9 253:17	church 1:5 6:5 21:2,5 21:15 22:16 28:17,22	243:2,2 244:13 245:1 245:11,14,18 246:19
carry 225:5	chairmanship 58:14 88:21	29:9,11 33:6 34:17 35:4 45:8 46:15,21	247:8,12,18 250:15 250:20 252:14,17
carrying 120:15	chairperson 52:20 53:3,6	52:8 59:3,15 61:16 65:10,11 69:5 70:4	253:9 254:2 255:2,10 256:18,21 257:13,16
Carver 9:16,16	chairwoman 54:3	77:19 78:5 81:2 83:2 84:3,11,22 85:2,3,5,6	257:19 258:2,4,6 259:10,15 260:4
case 1:8 6:8 7:19 87:4 131:11 188:11	change 8:17 125:16,21 125:22 126:6 205:18	85:6,13 89:1 91:18 94:12,16 95:22 98:20	263:14 264:8 267:17 269:14,20 271:12,14
189:20 211:18 279:10	235:3 242:19	99:22 100:1 102:9,16 102:18,21 103:2,5	271:20 272:3 274:10 274:11 280:3 281:3
cases 245:9,9 259:20 259:21	changed 14:19 243:1 248:7,9 260:6	104:8 105:14 106:2 106:18 108:15,20,21	churches 243:4
cash 125:19 128:7	changes 259:7	109:5,10,17 110:7,12 110:16 120:1 121:3	church's 87:11 227:12 242:3,20 254:21
cause 134:10 262:7 271:3	changing 262:4	122:3,9 124:2,6,14 125:18,19 126:19	Circuit 1:1 6:7
caused 169:13 230:1	characterization 43:7 45:22 48:6 55:11	127:2,14 128:3 129:8 131:20 140:8,10,13	circulated 91:1 201:14 201:21,22 202:5
causes 68:7,21 124:13	59:6 78:10 87:6 88:12 111:11 120:8	140:15,18,22 141:5 141:12 145:1,2	circumstances 7:18 29:7 154:11 167:8
ceased 209:7	178:6	146:18,22 147:3,5 155:22 156:22	192:9 207:17 209:6 212:1
Center 22:1,7	characterized 43:9	157:11,18,18 158:7 158:16 159:5 161:19	cite 122:17 174:9
certain 265:21	charge 109:4 199:13 210:7,9 229:21	161:21 166:10 168:15,16 170:17	City 9:12,19 201:13
certificate 11:1 133:5 135:7 139:9 142:14	charity 173:7	178:20,20 179:5,10 179:17 183:7 184:10	city-appraised 188:13
142:19 203:12 266:17 279:1	check 24:4 75:11 96:1 225:6	184:17 185:1,3,7,15 185:16 186:4,16	claim 137:8,12 166:3
certification 203:20 266:5,10	checking 229:19	187:8,10,15,21 189:3 189:8,9,12,18,21	claiming 49:2
Certified 2:12 84:7	checks 96:2,15 175:8 177:11 178:5	190:18,21 191:12 192:21 193:3,5,10,11	clap 263:19,20
certify 14:22 279:4	chest 170:20	194:9 198:9 201:13 208:8,9,20 210:14	Clarence 3:19 39:10 43:2 47:18 55:5 77:9
certifying 203:13	Chief 89:13 91:4,5,13 91:16,22 92:16 93:5	211:8,12 212:18 213:16 214:16,20	79:19 80:8 96:12 97:21 99:8,18 100:14
CFO 246:15 256:19,19	93:7,11,17 98:9 103:9 109:6,16		109:1 127:21 142:1 147:16 237:19
chair 54:7 55:21 56:1 56:14,22 57:1,7	116:20,20 246:16,18 247:8,11		248:12,13 255:6 258:11
60:14 82:9 95:11 98:2,6 101:14 104:2	child 19:13 20:4 169:21		class 76:14,14
106:17 107:13 108:4 108:14,19 109:18	childhood 36:16 169:22 170:2 234:5		clear 9:3 38:19 57:18 75:15 160:20 229:4
111:3 117:11 125:16 126:12,13 129:12	children 17:19 34:19		230:6 234:19 236:10
160:5			
chairman 49:10,16 50:7,16,20 51:16,18			

236:11	84:10 114:12 119:13	complain 62:9	congregation 74:13
clerk 140:8,12,15,18	120:16 121:19 122:6	complained 123:19	110:21 111:4,9 114:8
140:22 141:5,6,8	122:18 130:5 197:7	Complaint 159:12	121:12 178:20 179:3
193:11	210:19 217:13	161:5,11 167:12	184:10 185:7 218:1
client 188:10 222:10	223:15 230:3 237:2	168:13 178:16 179:4	263:7 269:14
222:12 268:12	240:17 253:14 264:7	219:3 269:16	connection 119:18
clients 188:8,12	264:12 265:10,18	complaints 121:11,16	connotation 217:8
Clifford 3:20 39:9	269:19 270:9 275:6	264:5	263:16
80:7 97:21 98:14	275:15	complete 233:19 278:5	connotations 217:14
199:2,6 200:4,10	comes 72:10 74:16	completed 242:14,15	Consent 155:7 267:7
clinical 12:18	122:16 124:17	242:16	consider 200:3 201:19
Clinton 7:13	179:16 263:1	conceal 111:8	consideration 154:13
close 36:10 171:2,3	coming 71:7 74:19	concealing 111:14	154:21
172:9 215:10 234:2,3	90:20 94:7 100:15	concealment 111:11	considered 102:13
closed 171:17 187:19	114:4 120:1,18 121:1	concern 35:4 36:5	196:4,5,6
190:7	122:8 176:16 232:11	62:9 64:16 73:12	considering 230:7
closely 105:1,10,16,18	249:22 250:2,22	75:1,6 211:14 227:14	consisting 153:13
170:16	265:1	228:15,16 236:18	constant 114:11
closing 241:20	comments 61:13,14	255:13	116:14 117:6 261:8
code 275:6,13,14	274:10	concerned 36:19	constitute 195:22
collect 252:16 253:3	Commission 278:18	61:17 69:15 78:6,7	constituted 172:20
collected 75:7 76:21	279:15	90:16 128:6,9,10	consultant 273:3
77:12 78:21 247:15	commissioned 94:19	202:22 220:1,3,4	consulted 220:9
248:7 250:15	commit 255:7 257:14	227:18,20 228:21	consulting 230:18,19
collecting 74:5,12,14	committed 241:2	229:1,11	contained 194:1,3
127:3	committee 119:1	concerning 88:22	contents 161:10
collection 75:19 76:2	129:3 140:11	102:22 103:3,6	continue 36:12 173:6
82:8 127:19 250:19	communicate 206:18	126:15 154:3 166:11	174:12,15 190:13
collections 75:16 81:1	communication 254:5	166:12	259:16
81:4,9,10 82:2	communications	concerns 61:15 62:3	Continued 4:1 281:1
126:20 128:4 253:20	126:13 166:9	228:19 229:5 258:13	continues 99:2
254:7	community 45:8 46:15	concluded 277:9	continuing 143:7,10
collectively 89:19	59:4 110:16	conclusion 133:20	164:3,17
95:14	compensated 91:16	180:21	contract 230:20
collects 77:3 125:19	107:17	condition 206:20	contracted 94:20
127:21	compensation 98:17	conditions 173:7	contractors 89:12
college 10:4,5,6 22:2,4	98:19,21 99:2,6,19	conduct 218:8,12	contrary 159:3 203:2
23:3	101:9 107:18 108:6	conducted 69:2,16	contribution 175:12
Columbia 15:4 147:14	competency 206:17	94:15 121:18	contributions 175:8
209:8 266:14	207:6,6	conducts 76:14,14	control 203:4 204:11
come 20:22 24:15 25:2	competent 203:4	conference 241:12	204:13 227:19
30:8,17,19,21 46:13	204:11,13 210:20,22	conflict 91:11,15	228:17
51:15 69:3 70:3	247:11	102:10	controlled 177:3
73:20 74:17 75:12	compiled 191:14	confusion 178:19	controls 256:17,19
76:9,10 82:1,4,11	200:18	179:2 269:13	convened 164:9

<p>conversation 49:9,12 50:6 51:4,12 57:11 63:9 145:8,11 146:2 170:3 171:5 203:3 233:19 263:13</p> <p>conversations 60:17 60:20 171:6,7 218:3 218:5</p> <p>conveyed 65:14,19</p> <p>COO 86:4</p> <p>copied 237:2</p> <p>copies 95:12,15 228:4 228:8 251:4</p> <p>copy 26:13 28:5,8 95:8 131:1 191:13 201:15 228:6,12</p> <p>corner 149:6 156:6</p> <p>corporate 67:18 142:14 148:2 188:13 203:13,14 266:17 267:1</p> <p>corporation 85:3,5 209:8,9 244:11</p> <p>corporations 141:18 147:11 149:3 242:6 266:14,22 267:5,12</p> <p>correct 8:19 13:15 16:14 17:1 26:3 27:14,22 28:17 31:3 31:7 35:19 37:17 38:2,3 39:1 42:10,15 42:19 43:4,17 55:2,3 56:17,21 57:8,13,14 57:16,17,21,22 58:4 58:8 65:8,20,21 66:7 66:10,15,21,22 71:9 72:5 74:7 75:20,20 75:21 86:11,12 92:20 98:2 104:2 107:5,15 109:11 113:13,16 117:1,12 119:9,10 121:2,7 123:14,20 138:10 139:6,7 144:13,16 158:8,17 160:12 162:3,7,10</p>	<p>165:19 177:16,22 186:3 195:12 197:20 199:17 202:2 206:21 208:5 209:5 212:11 235:18 238:8 244:21 246:4,5 269:8 274:1 278:4 279:5</p> <p>CORRECTION 280:6 281:6</p> <p>corrections 278:6,15</p> <p>correctly 21:13 123:8</p> <p>Cortez 10:7,22</p> <p>counsel 6:15 7:5 12:13 26:8 58:17 131:2 136:2 143:6 150:13 160:15 178:2 180:19 185:16 186:3,8,16,17 187:21 189:2,11 191:15 202:4 227:1 279:9</p> <p>counseling 12:8 22:7</p> <p>count 261:12</p> <p>counted 77:14,15,17</p> <p>Counter-Defendant 1:8</p> <p>Counter-Plaintiffs 1:13</p> <p>counter-signatures 96:6</p> <p>County 1:1 6:7 278:11</p> <p>couple 122:21 215:8</p> <p>course 11:13 86:19 121:8 238:14</p> <p>court 1:1 6:7,21 8:11 27:16 225:13</p> <p>covering 75:2</p> <p>covers 221:11</p> <p>create 182:11 267:16</p> <p>credit 101:21 102:16 102:18,22 258:4,6</p> <p>CREED 3:17</p> <p>criteria 173:8,11 174:3,7,13,16</p> <p>current 7:11 20:9 33:14,16 34:6,9 66:9</p>	<p>83:14 84:15 97:18,20 166:16 185:17,19,21 194:8,11,19 195:1</p> <p>curtail 219:19 220:6</p> <p>custodian 100:22</p> <p>cut 216:12,17,21 275:13</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 6:1</p> <p>Dan 126:14</p> <p>date 6:9 8:16 9:6 30:3 53:12 91:1 93:9 113:20 149:17 153:11 157:1 159:21 160:5,12 164:11 170:5 181:12 187:11 202:8 236:15 237:14 278:10 280:22 281:22</p> <p>dated 133:7 139:14 148:2 152:8</p> <p>dates 17:4 26:2,3,4,6 57:3,5,19 215:6</p> <p>day 37:7 104:14,15,17 137:1 198:10 219:4 224:11 225:4 232:19 251:22 270:18 278:12 279:13</p> <p>days 8:15 54:19</p> <p>day-to-day 108:15,20 109:4,11 232:2,9 257:20,21 258:2</p> <p>deacon 31:20,22 43:20 44:2 77:7,10 79:13 79:19,20 80:1,6,6,7,8 86:2 89:15,16 91:6 95:4 127:21 140:8 142:17,17 148:13,13 150:2 209:3,4 213:15 213:18 216:11 240:20,21 248:1,12 248:13,22</p> <p>deacons 73:20 74:4,8 74:8,19 77:4,6</p>	<p>239:17</p> <p>deal 51:6 75:16 79:8 79:10 102:7,10 250:11</p> <p>deals 79:14</p> <p>death 53:2,6,13 55:20 57:8,9,12,16 58:6 64:12 80:2 81:17 110:7,22 113:3,12,21 114:21 118:3 170:7 211:1 219:5 220:2 259:17 260:3</p> <p>debt 36:17 169:14 171:21 221:15 229:16,16 230:1 236:2,10</p> <p>deceased 55:14 92:20 128:11</p> <p>December 39:19 83:10 83:12 133:7 136:21 137:15 138:6 157:13 160:18 242:16</p> <p>December/January 83:9</p> <p>decide 80:18 172:8 220:5</p> <p>decided 92:15 234:4</p> <p>decision 91:12 162:11 162:15,16 240:5,10 242:8</p> <p>decisions 66:12,20 170:21 206:18 238:12,13 239:5,7,8 239:12,14,15,19,21 239:22 240:2,13 241:19</p> <p>Declaratory 159:14</p> <p>decreased 116:9</p> <p>decreasing 127:10</p> <p>deed 65:13,16</p> <p>deeded 235:12 236:7 236:12,18</p> <p>Defendant 178:18,18 179:1 269:12,12</p> <p>Defendants 1:12 5:8</p>
---	---	--	---

<p>28:1 130:14 DEFENDANTS/CO... 3:8 7:6 Defendant's 243:12 266:3 defense 6:18 28:4 131:1,7 defer 240:12 deficiencies 120:5 deficit 235:7 Defts 5:8,10 degree 11:1,2,15 12:18 delayed 258:19 demanding 219:8,17 220:7 Denise 3:21 31:15 39:9 43:1 53:19 55:5 79:19 80:1 86:2 87:17 96:10,10 97:21 99:8 105:13 109:1,8 109:9,13 141:3 205:7 205:9 237:19 255:5 258:10 259:8 deny 110:15 Department 18:20,21 18:22 19:15,21 157:5 157:13 depends 77:10 DEPONENT 278:1 deposited 79:3 deposition 1:15 2:1 6:3,12 7:15 55:12 97:7,15 206:2,10 227:9 277:3,8 depositions 223:17 225:18 describe 259:9,19 described 68:9 description 5:7 104:7 104:13 designation 87:12 desirable 126:17 desk 191:16,17,19,19 details 189:16 determination 183:20</p>	<p>determine 219:22 developed 250:5 developing 250:7 development 19:14 20:4 169:21,22 170:2 died 56:16 105:13 115:2,3 119:7 215:7 different 27:9,12 42:9 42:11 56:10,13,15 62:8 69:8 94:9 114:4 114:10 120:13 124:18 178:6 212:20 262:6 Dillow 126:13 direct 155:5 159:16 259:14 Directing 148:4 157:3 183:22 185:10 direction 52:7 74:2,5 74:13 directions 74:1 147:4 147:5 directly 231:3 259:5,7 director 17:17 19:13 20:4 22:6 157:17,22 214:15,18 directors 141:22 147:15 155:8,9,18,21 156:3,13 203:15 218:20 256:20,22 257:2 267:7 disbursements 177:7 discharge 18:4,7 discharged 17:2 disciplinary 7:21 disclosed 107:18 discord 178:19 179:2 269:13 discuss 60:17 120:12 207:14 248:5 discussed 33:16 119:15,17 120:12 discussion 91:12 119:4 119:8 128:16 198:21 214:9,17 216:4</p>	<p>260:21 261:2 discussions 89:18 118:16 214:13 215:11 disharmony 178:19 179:2 269:13 displeasure 262:8,9 disposition 76:2 78:8 dispute 55:15,17 213:20 214:1 disrespectful 203:2 dissatisfaction 33:14 34:6 distinction 218:21 District 10:12 15:4 147:14 209:7 266:14 Division 157:6 divorce 20:14 doc 188:14 document 28:5,6,8,11 37:9,11,18 38:14,22 40:11,18 42:14 50:5 50:14 57:20 60:3,6 133:11,16 134:2,7,10 134:13,19 135:6,11 135:16,17 137:7,8 139:16 140:19 142:8 143:5 147:20 148:17 149:14,15 150:2,5,7 150:14,16,17 151:17 151:22 152:2,6,13 153:3,5 155:7,13 156:12,17 169:8 175:21 188:15,21 189:4 192:6,7,15 195:6,8,17,18,21 196:1,4,8,22 197:11 199:5,12 201:9 237:7 237:11,17 238:7 243:16 251:2 documentary 175:19 documentation 48:16 145:9 167:21 168:2 172:1,2 204:4 documentations 235:9</p>	<p>documents 5:10 133:6 135:7 136:5 139:10 142:20 150:8 156:21 158:22 180:13,14,16 183:1,3 188:11,13 192:18 238:5 256:8 266:5,6,10 267:14 268:6,8,9,18 269:2 doing 50:1 65:4,5 88:4 105:14 113:18,22 114:2,3,5 119:12,19 122:12 179:18 218:10 259:16 dollars 24:14 169:14 171:21 173:13 229:13 230:1 231:13 Domestic 147:11 266:13,22 267:4,12 domestically 16:16 Dorothy 3:22 39:10 43:1 44:2,6,13 47:19 52:14 55:5 77:7,8 79:13,20 80:6,7 89:15 91:3,6 95:4,8 96:11 97:22 109:2 116:21 132:12 142:2 142:17 143:1 147:16 148:13 149:9 150:2 152:10 153:14 155:11 156:14 157:9 199:7 202:19 203:16 204:8 222:3 237:18 246:11,12 248:1 255:6 258:11 Dot 246:20 doubt 73:7 92:18 133:15 134:5,18 135:5,10,21 139:15 142:7 143:3 147:19 148:16 149:13 Doug 47:22 Douglas 21:12 210:15 downtown 14:6 Dr 39:11 208:11 drafted 186:22 187:1</p>
--	---	--	--

Drive 3:4	168:14	evaluation 68:2 93:10	expenditures 177:4,7
dropped 174:20	elders 114:4,10 262:18	evening 33:11	177:19 178:5,12
dry 232:21	elect 54:2,6 56:21 57:1	events 120:15,19	221:1 229:22 234:22
due 198:8 228:21	167:4	121:3	expense 99:12 103:3,7
duly 7:4 121:5	elected 29:1,8 51:15	everybody 26:7 41:22	expenses 99:7 101:21
duties 104:19,20,21	56:5,11,14 57:7,10	42:1,17 226:14	Experience 109:19
105:2,9	121:5 132:11,13,20	everyplace 80:21	Expires 278:18 279:15
dying 220:11	159:6 161:19,21	evidence 46:1 174:7	explain 36:5 45:5,17
D-e-a-c-o-n 31:22	167:14 180:3 184:2	evil 270:20	45:18 268:2
D.C 10:2,12 13:1,5,12	201:1,6 237:12	Ex 5:9,10,12	explained 46:10
13:15 15:9 16:2 21:9	240:18	exact 36:7 258:1	explanation 89:22
209:21 210:2 242:7	election 51:17 184:6	exactly 91:7 114:18	90:7
	200:10 202:10	115:1 123:2 126:22	exploited 122:8
E	elementary 9:16 11:17	161:13 180:7 207:4	express 33:13,13 34:5
E 3:1,1 5:1 6:1,1 280:1	11:19	248:15 250:6 253:13	35:5 62:9 101:17
280:1,1 281:1,1,1	else's 37:19	259:12	expressed 64:15
earlier 59:12 120:2	emergency 202:22	EXAMINATION 7:5	211:14
137:7 162:19 199:14	employed 100:1 279:9	227:1	extensions 166:2
202:11 211:14	employee 7:20,21	examined 278:3	extensive 222:9,12
231:20 240:22 243:7	100:19 105:14	exceeded 173:13	extensively 244:16
249:21 262:21 265:3	230:10,13 273:1	excellent 122:11 265:4	extra 72:10
271:11	employees 102:9,11	265:11	eyes 270:16
early 113:9 169:21	103:6 106:2,16,18	exceptional 17:17,21	
170:2 224:9,10 227:9	107:14,18 172:22	excess 81:2 221:2,3	F
234:5 264:11	173:2 257:13,19	excluded 167:18	F 3:9 140:8,9 188:8,12
East 7:13	employment 102:4	excuse 23:3 33:19	face 184:10,16 185:1,3
Easter 264:9	ended 165:18 273:5	39:19 80:7 93:15	271:12,19 272:3
education 11:16 18:14	enrollees 174:20	168:22 205:15 211:6	faces 264:3
18:16,16,20	entailed 232:6	213:22	facilitating 231:3
educational 9:9	entitled 116:5 275:21	execution 207:18,20	facilitator 23:1,22
effect 145:18 165:14	Errata 278:6	exhibit 5:7 26:10 28:1	24:6,7 25:9
203:22 276:8	error 8:19	130:14 131:1,7 133:4	facilities 100:3 101:3,5
effectively 184:9	errors 8:17	135:8 155:6 156:5	101:9
effort 154:11	escapes 47:22	158:3 188:3,4 228:2	facility 47:15
efforts 233:14	especially 270:14	236:22 237:5 243:10	fact 8:12 42:21 43:13
eight 15:5	ESQ 3:3,9,17,18	243:12 257:4 266:3,9	46:14 54:1,5 63:1
Eighty-three 16:8	established 78:12	266:12	72:11 84:7 93:12
either 44:12 49:10	119:2 138:1 154:5	Exhibits 5:6,6	102:8 110:15 121:6
50:20 53:15 63:17	163:8,17 168:9 173:9	exist 191:7 202:1	125:2 140:4 155:21
67:19 74:6 136:15	181:1 196:13	existed 144:6,15	156:22 158:5,16
153:18 154:1 166:11	estimate 107:4	existence 138:10	159:4 160:11 180:9
174:17 200:8 223:6	estimation 116:4	existing 137:5 150:17	181:19 182:3,11,12
elder 35:13,14,18	et 1:11 6:6 280:3 281:3	Exm 5:4,5	183:6 215:14
43:22 46:21 56:5	ethic 226:21	expect 30:17,19 70:4,6	facts 45:10 55:11
64:7,9 74:3,6 113:2	evaluate 119:21	179:9,11,12	90:11 93:20 107:22

108:9 111:21 112:6 112:14 129:15 134:9 136:13,15 137:18 154:4 163:7,17 165:2 168:8 180:22 196:12 factual 90:2,11 failed 68:21 fair 73:1 240:12,15 241:5,7 256:14,16 260:13 fall 45:8,20 46:13 47:2 49:15 50:5,15 51:12 57:15 58:21 familiar 135:15 192:4 192:8 215:14,18 268:5,7 families 17:18 169:12 172:21 173:1,5,12,16 174:11 229:17 family 17:17 37:1 174:4 235:15,16 251:22 275:2,4 family's 36:16 far 24:4 42:5 49:18 110:10 117:5,7 118:19 132:1 163:11 177:9,12 206:17 212:8,9,12 faster 222:21 February 190:6 federal 18:11 feel 68:7 71:5 105:6 122:2,7,10 124:11,13 fees 235:10 fellowship 70:5 felt 59:14 116:5 215:2 273:7 Ferguson 208:2 file 85:9,16 255:3 filed 85:7,13,17,21 86:1,10,15 87:4,11 87:20 107:19 121:6 137:7,12 142:4 144:7 147:13 157:4,12 219:20 220:2 256:2	256:11 266:14 filing 179:6 254:22 filings 87:22 181:16 fill 55:8 118:4,21 119:9 filled 55:21 filling 118:17 finance 73:11 74:20 75:8 76:17 77:8,13 140:11 165:4,11,12 193:8 212:19 222:2 246:15 253:14,21 254:12,15 finances 193:7 246:7 250:22 financial 66:2 73:6,8,8 79:11 82:21 83:1,4 84:21 88:6,9,9,14,22 89:4,8,12,13,20 90:8 90:17,22 91:4,5,13 91:16,22 92:16 93:6 93:7,11,17 95:21 98:9 103:9 116:20 127:22 128:3 172:4 173:6,7,21 174:13,16 175:1 212:14 213:2 246:1,4,16,19 247:8 247:12 249:19 255:20 256:8 279:11 financially 235:6 financing 221:16 find 152:22 198:15 245:8 fine 26:1 34:3 114:7 124:17 136:2 finish 39:14 43:6 58:17 77:18 160:10 223:16 224:9 225:5 226:2,3 fire 256:6 fired 220:13,15,17 firing 219:8 220:7 firm 84:4,5 188:11 first 5:8 10:6,7 14:17 37:20,21 62:1 72:13	75:16 131:9 134:12 144:5,14 148:8 155:17 158:7,19 180:19 181:9 182:21 192:6 214:5 224:15 225:3 226:3 254:19 five 50:19 54:18 102:8 106:4,13 227:7 234:18 251:3 Floor 3:5 Florida 10:21 12:16 flourish 232:20 flowing 70:12 focus 134:16 focused 265:20 folks 220:7 follow 16:21 271:14 following 44:6 52:10 181:16 224:11 233:6 256:1 follows 7:4 football 129:9 233:1 247:16 249:5 force 203:21 foreclosed 36:18 foreclosure 62:18 63:2 63:5 64:16 103:10 235:20 236:19 247:4 foregoing 278:4,14 279:3,4 Foreign 141:18 147:10 266:13,22 267:4 forged 136:6 forgot 241:21 form 99:6,12 129:14 173:6 formal 7:17 61:2 119:20 175:19 212:3 formalize 41:20 formalized 42:8 former 44:5,11 168:15 Fort 19:11 Forte 84:1,10 95:6 forth 45:10,15 69:21 70:17,19 193:18	234:4 237:15 250:12 forthcoming 89:5 90:9 93:13 forward 191:9 215:17 foundation 227:17 four 27:9,12,21 82:19 139:12 152:9 223:16 264:16 frame 83:9 102:2 230:7 236:16 framework 70:15 free 229:20 236:10,11 fresh 222:20 friend 230:17 friends 170:15 251:22 front 76:22 77:10 122:8 132:5 216:22 218:1 252:13 full 7:10 163:1 203:4 203:21 204:13 215:3 fullness 265:11 fully 204:10 full-time 13:9 103:21 104:8,9,11 105:20 fulment 178:19 179:2 fulmenting 269:13 functioning 94:3 funds 76:3 78:8,11,16 78:20 79:3 189:21 248:7 252:22 future 214:16,19
G			
G 6:1 games 247:16 249:5 generally 122:11 generated 248:11 249:9 Geneva 208:22 genuine 134:11 135:21 136:5,15 155:14 156:18 genuineness 135:10 139:16 142:8 143:4 147:20 148:17			

149:14,14 George 47:20 Georges 6:7 GEORGE'S 1:1 getting 33:20 61:4 82:16 120:14 170:20 189:16 218:13 228:9 232:22 233:3 255:19 257:10,11 Gill 241:16,17,17,18 241:22 give 8:9 63:11 75:9 76:9,10 106:20 107:14 115:17,22 116:2 132:8 147:4,5 186:13 187:11 233:6 249:15 275:21 276:2 given 8:14 22:19 41:12 54:2,6,17 63:6 73:22 74:20 80:13,15 89:22 90:7 106:15 118:6 126:21 153:18 154:1 154:20 155:2 167:3 182:8 192:15 199:19 200:7 201:15 203:21 212:19 268:15 278:5 gives 28:16 giving 80:9 123:20 262:22 276:9 glad 8:6,8 228:7 Gloria 1:16 2:1 5:3 6:3 7:3,12 97:8,15 206:3 206:10 237:20 277:4 277:8 278:2,13 go 9:13 10:5 16:15 27:11 31:5 36:21 39:14 45:12 46:3 58:18 59:2 62:19 64:4 67:8 72:16,18 72:19,20 73:3,4 75:8 75:11 76:19 84:17 86:21 87:20 90:13 94:1 111:12 112:9 131:9,12 132:10 133:3,3,21 137:20	139:21 154:7 163:18 164:4 171:13 178:7 181:2 183:10 184:21 188:1,4 196:14 209:16 219:15 222:21 223:20,21 224:1 225:1,13 227:17 263:14,19 264:10 266:4 268:12 275:19 God 271:15,16 goes 77:13 78:5 222:1 262:22 275:5 going 32:17 36:18 38:22 50:4 62:17,18 63:1,5 64:16 73:13 78:4,22 85:15 97:9 107:6 118:11,15 122:14 127:15 130:10,22 131:12 135:18 137:17 166:1 170:22 171:2 182:1 183:8 191:21 202:3 205:17 206:4 213:20 214:1 215:16 216:17 221:20 223:4,6,11,16 224:8,18 226:2 228:8 228:12 232:11,20 237:1 245:8,10,11,11 250:4 263:13 266:4 269:8 270:17 273:13 276:22 277:5 good 7:8,9 8:18 11:7 59:11 97:3 122:15 168:7 205:19 222:14 262:16 goodness 64:11 gotten 74:2 118:19 governance 228:20 governing 33:6 34:11 government 18:11 grade 9:14,15 grades 168:18 171:4 241:9 graduate 9:20 12:1	graduated 9:21 12:2,5 12:9 graduating 9:22 Graham 3:16 6:11 grant 143:6 Greenbelt 1:17 2:6 3:13 6:14 Greenwald 2:3 3:10 6:13 Gregory 16:10 grew 9:12 235:17 ground 8:21 group 42:21 166:3 167:4 201:18 205:10 grow 9:11 guaranteed 126:19 guess 17:5,7 30:11 42:3 47:7 52:7 54:20 58:12 59:2 61:9 63:18 69:22 70:3 71:2 77:18 81:6 82:4 106:22 107:2,7,8 114:17 115:19,20 116:5,14 185:9 218:14 230:4 251:21 261:18 265:16 guessing 107:15 guesstimate 115:16 guesstimation 116:3 guest 222:13 guidance 12:8,13 guiding 70:13 221:10 guys 223:12 gym 274:22 275:5,9,11 275:19,22 276:3,6	115:11 118:11 146:15 165:9 191:22 245:10 263:4 happened 29:14,16 30:22 74:22 116:6,7 116:15 117:3,17 126:22 127:1,4 151:3 171:14 174:18 175:1 200:15 219:3 253:11 253:13 274:6 275:9 happening 75:4 199:11 218:15 happens 77:11,16 happy 9:4 143:8 hard 18:18 harm 178:21 hazy 32:3 head 8:10 76:17 107:16 123:22 126:3 225:13 headmaster 168:15,17 175:15 232:5 235:5 health 130:3 hear 135:19 136:7,8 238:18 252:2 270:6 heard 200:10 218:8,10 224:16 252:1 hearing 201:16 held 97:11 130:12 206:6 276:15 help 26:2 214:11 222:21 Henry 3:18 47:18 185:14,22 186:8 189:2 190:3,20 220:18 hereunto 279:12 he/she 278:14 high 9:16,20,22 13:20 him/her 278:15 hired 220:13,21 history 28:16 Hmmm 216:11 hold 17:3 98:12 132:4 132:7 224:10
---	--	---	--

H

H 3:3 280:1 281:1
hand 26:11 36:10
130:22 279:13
handled 128:7
handles 221:18
handling 212:14
hands 94:6,6
happen 8:2 79:21

<p>holding 91:13 141:4 141:11</p> <p>holdings 209:13,20,21 210:1</p> <p>hole 169:9 229:14</p> <p>Holy 70:12,14</p> <p>home 7:11 103:11 211:12 235:12,15,16 235:17 247:4</p> <p>honesty 249:2</p> <p>hope 26:4</p> <p>hour 222:18 266:2</p> <p>hours 264:16</p> <p>hour-to-hour 109:4</p> <p>house 36:16 37:1,3,4,5 62:5,11,15 63:1,13 63:16,22 64:2,5,7,9 64:16,22 65:1 236:4 236:5,6,12,17</p> <p>huh 10:9 67:9 216:12 216:13</p> <p>huh-uh 258:3</p> <p>husband 15:20 16:14 18:5 211:11</p> <p>husband's 16:8,22</p> <p>Hyattsville 242:22</p> <p>H.D 13:6 15:12</p> <hr/> <p style="text-align: center;">I</p> <p>idea 40:22 76:20 81:10 81:14 91:20,22 92:2 92:11 101:14 103:15 106:4,6 144:1 168:4 177:1 197:7 205:3 209:18 214:3 234:1 235:7 268:18</p> <p>identification 28:2 130:15 228:3 237:5</p> <p>identifier 188:10</p> <p>identify 6:15 152:1 237:6</p> <p>identity 201:22</p> <p>ill 113:15</p> <p>illegal 164:9,12</p> <p>ill-prepared 265:15,17</p>	<p>imperative 225:11</p> <p>important 8:9 257:20 257:21 258:2 260:21</p> <p>improper 136:3</p> <p>inactions 172:19</p> <p>inappropriate 177:20 178:13 217:7 218:7 218:11 274:9,13</p> <p>incidents 273:12</p> <p>includes 142:22</p> <p>including 26:8 43:1 193:16</p> <p>incompetent 210:20</p> <p>Incorporated 6:6 85:7 94:13 194:9</p> <p>incorrectly 123:14</p> <p>increased 116:9</p> <p>increasing 127:10</p> <p>indicate 46:1 246:3 247:10</p> <p>indicated 193:18 267:15 273:7</p> <p>indicating 192:5</p> <p>individual 84:6 109:10 126:14</p> <p>individually 42:1 120:5</p> <p>individuals 42:8,22 43:8,17 99:4 127:13 142:15 143:18 148:20 155:20 156:21 157:10 197:22 245:13 263:6</p> <p>informal 119:21</p> <p>information 82:5,9 132:1 161:12 170:18 191:14 203:5 219:10 219:12</p> <p>informed 206:18</p> <p>initially 233:22</p> <p>initiated 209:18</p> <p>injunctive 159:14 178:21</p> <p>inquired 185:20</p> <p>installed 260:8,11</p>	<p>instance 122:17</p> <p>institution 175:2</p> <p>institutions 166:22</p> <p>instrumental 104:22</p> <p>insulate 102:10</p> <p>insure 34:16,16,22 36:13 86:14 87:21 95:21 108:5 128:3 129:7</p> <p>insuring 87:3 127:19 232:8</p> <p>integrity 95:21 128:4 247:1,7 248:22</p> <p>intend 181:22</p> <p>intended 234:2</p> <p>intent 258:16,18</p> <p>intention 234:3</p> <p>interest 64:22 102:10 279:10</p> <p>interference 33:20</p> <p>interim 112:21 113:5 113:6 260:2,8,14</p> <p>Internal 107:19</p> <p>interpretation 123:20</p> <p>Interrogatories 5:9 26:16</p> <p>Interrogatory 28:12</p> <p>investigate 66:7 154:11 181:22 183:20</p> <p>investigation 154:17</p> <p>involved 44:5 78:20 171:11 212:2 272:9 272:15</p> <p>involvement 21:14</p> <p>irreparable 178:21</p> <p>IRS 108:6</p> <p>Isaac 3:3 6:19 131:20 187:5,21</p> <p>issue 102:13 123:16 126:8,10</p> <p>issued 178:22</p> <p>issues 78:5 94:9 120:13 130:3</p> <p>items 131:6</p>	<p>Ivy 2:4 3:11 6:13</p> <hr/> <p style="text-align: center;">J</p> <p>J 188:12</p> <p>Jackson 3:19 39:10,10 43:2,2 47:19 52:13 55:5 77:7,8,9 79:19 80:8 96:12,15 97:22 99:9,19 100:18 101:15,17,20 109:2 127:21 128:20,21 142:1 147:16 193:17 199:8 225:12 237:19 237:19 248:1,12,13 255:6 258:11 276:18</p> <p>Jackson's 100:14 101:5,11 248:22</p> <p>Janice 251:3</p> <p>January 83:10,12 139:14 140:5 157:1 242:10,16</p> <p>Jennie 31:20,22 43:2 52:13 193:17 198:1 199:8 222:4 237:19</p> <p>Jericho 1:4 6:5 20:19 21:1 22:16 28:22 29:2 47:15 66:13,19 67:2 75:8 79:18 81:2 81:11 85:5,6 94:12 94:16 95:22 100:19 100:22 102:4 112:18 128:8 136:21 143:19 144:20,21,22 145:1,1 146:17 148:21 149:19 155:9,21 156:22 157:11,18,18 158:4,6 159:5 166:16 166:21 168:15 169:4 180:18 181:6 182:13 183:7 184:17 185:1 188:12 190:5 191:2,8 194:9 195:22 197:14 201:13 209:7,13,22 210:1 211:12 243:1,1 243:2 244:13 267:17</p>
--	--	--	--

272:22 280:2 281:2	218:7,10 219:4 227:4	keep 36:22 70:6,11,15	78:2 79:5,14 80:20
job 1:20 13:17 14:11	228:19 232:4,15	94:2 111:7 256:12,14	80:21 81:3,7,12,15
14:15,17,20 15:6	233:13 234:8,10,20	261:18,19	81:19 84:12,12 85:20
19:2 20:2 24:7 86:3	235:13 236:13,18	keeping 232:10	86:11,18 87:7 89:4
86:4 99:22 100:2	252:11 254:6,14	Kenilworth 21:10	90:12,14,20,21 91:2
104:6,9,9,12 105:20	256:4 260:1 261:15	kept 36:10	91:7 92:7 93:22 94:4
117:22 118:4 210:17	262:10 264:5 265:4	key 275:11,19,22	94:5,6 97:20 101:2,3
Joe 6:6	267:1,16 268:21	276:3,5,8,9	104:22 105:1,2,16
Joel 1:10 4:2 35:13,14	269:12,17 271:11,15	Killen 3:21 31:15 39:9	106:3,8 107:7,8
35:18 40:13,16 41:5	274:8 280:3 281:3	43:1 53:19 55:5	108:1,11 110:10
41:12 44:15 48:3	Joel's 40:20 66:1 71:5	79:19 80:1 86:2	112:1 114:18 116:3
57:11 62:3,10 63:21	73:5 168:2 214:14	87:17 89:14 96:10,15	117:5,10,11,13,15
64:7,9,22 65:1,14,20	252:5	97:21 98:7 99:8	118:6 120:1,13,13,15
66:13,20 67:1 68:8	Joey 35:12,15,16,19	103:20 105:14 109:1	120:16,16,17 121:21
68:20 69:22 70:19	46:21 47:18 48:3,18	109:8,10,13 141:3	122:2,6,8,13,15,15
71:7 73:6,15,22 74:3	48:21 50:6,16 57:11	205:9 206:13 225:3	123:2,2,3 124:17
74:6,11,13 75:22	60:12 74:16 169:11	237:19 255:6 258:11	125:21,22 126:1
76:13 77:2 105:11	172:22 185:9 216:6	259:8 276:18	128:1 129:17 134:1
113:2,5 114:12,21	219:7 229:20 236:3,7	Killen's 109:15	134:18 135:1 138:3
115:6,13 116:8,17	262:4 269:20 270:1,2	kind 11:1 13:8 18:17	138:22 139:4,5,19
117:4,22 119:16,19	270:11,18 271:22	34:15 48:15 70:11,11	140:1,4,16 144:3
120:14 121:4,12	273:8 274:15,18	74:18,18 82:22 83:5	145:15 150:11,15
122:10,15,17 124:5	275:10	99:13,15,16 186:15	151:13,16 153:22
124:13,16 133:8	Joey's 35:11,22 125:4	193:8 201:7 216:10	154:6,15 155:12
136:19 137:14	227:18 228:15,16	217:14 219:16,18	156:2,17,20 157:10
138:12,20 139:13	Joe's 35:9	220:6 221:10 248:5	157:22 158:2,3
142:1,2,16,22 144:8	John 142:22 148:12	264:16 271:5	162:12,18,20,21
145:7,7,16 146:6	joined 57:19 82:20	knew 48:22 216:14	163:4,8,19 166:15
147:15 148:12 149:8	94:20 100:7,8 128:17	245:4 255:15 272:18	167:8 168:1,10
150:4 153:15,17,22	joining 101:4,8 126:4	know 7:17 8:8 12:1	169:13,14,19,20
154:12,19 155:10	Jonquel 37:3	17:9 25:6,7 27:8	170:13,17,21 171:1,1
156:13,14 157:8,16	Joseph 2:3 3:10,17	30:10 33:7,8 34:20	175:18 176:17,18
159:3 162:14,15	6:13	36:4,9,10,12,17,17	177:4,12 178:11
163:5,10,14 164:8,15	Joy 47:19	36:21,21 38:7 40:9	179:13,16 182:1,8,9
164:22 165:2 167:17	Jr 185:14 186:8	40:12,15 41:22 42:5	183:11 185:22
167:19 168:14 169:4	judge 225:14	42:11 46:19 47:21	186:14,16 187:17
172:19 175:7,14	Judgment 159:14	48:7,8 49:5,17,18	188:20 192:9,12,14
177:10,18 178:11,18	July 23:11 83:19	51:20 52:15,17 55:2	192:18 194:4 195:15
179:1 180:2,9,16	June 23:7,11,20	55:12 63:14,15,16	195:16,17 196:17
181:5,19 182:3,12	Junior 13:20	64:1 65:3,12 66:3,9	198:12 199:13
183:6 184:9,17 185:2	J-e-n-n-i-e 32:1	67:1,5,9 70:2,5,9,12	200:18 202:15 203:6
185:18 199:19 200:7		70:16 71:20,21 72:14	203:7 205:3,4,7
201:12 202:9,19	K	72:15 73:12,13,21	206:13 207:7,17
203:16 211:15 215:1	K 169:22 170:2 174:19	74:3,16,19,21,22	208:2,3,11,17,22
215:16 216:16 217:6	190:13 234:5	75:6,7,8,12 76:8,11	209:6,11,21 210:6

212:14 214:3 215:9 216:9 217:3,5,5,11 217:12,13,13,14,20 218:14,17 219:22 221:22 222:1,1,2 224:13 225:7 228:18 229:2,15,15,22 231:3 231:18,20 232:2,6,9 232:10,11,15,21 233:2,4,7,9,16,17,20 234:4,4 236:1,6 238:15,16,20,20 239:9 244:18 245:1,2 245:10,13,17 246:6,6 246:8,9,20 248:13,15 248:15 249:12,22 250:1,1 251:18 254:11 255:2 256:12 257:9 258:6 259:12 259:21 261:18,22 262:5,7,8,8,14,16 263:8,17,20,20 264:2 264:11,13,22 265:17 265:17 270:10,10,21 270:22 271:1,3,4,5 272:13 273:15 274:13 275:12,18 276:8 knowing 154:16 202:5 258:1 275:5 knowledge 28:18 38:5 51:8,14,19 52:4 54:1 54:5,10 62:14 63:1,3 63:4,6 65:7,22 86:8,9 86:13 87:8 88:21 89:3,9 90:14 92:18 94:22 95:16,19 99:11 99:17 100:17 101:7 101:10,19,22 102:17 102:20 103:22 104:1 104:11 126:8 133:1,2 135:9 136:17,22 137:2 138:8 142:9 143:11 147:22 148:19,22 149:16,18	159:2 161:11 165:16 165:20 166:5,8,14 169:3 171:22 172:15 172:18 175:11 177:9 180:6,11 188:17 200:1,6,12 206:16,20 210:21 220:20,22 221:17 232:13,14 244:19 247:3 248:6 251:14 252:15,18 known 8:12 35:18 46:15 59:14 227:4,6 244:17,19 knows 67:20 135:20 136:4,15 Kwiditt 47:22 K-12 190:17 K-5 174:19 190:17 K-6 174:19 <hr/> L <hr/> Laake 2:3 3:10 6:13 lack 159:2 262:22 266:1 LAD 6:22 lady 263:8 lady's 241:15 263:22 Lake 9:12,19 land 52:6,6 210:3 Landsdowne 43:2 52:13 193:17 199:9 237:20 272:6 Lane 2:4 3:11 6:13 133:9 136:20 137:14 large 147:7 LaShonda 31:17 43:3 199:8 237:21 272:6 LaShonda's 31:17 late 54:7 55:8 223:12 224:9 257:9,10 264:11 lately 73:10 254:19,20 lateness 266:2 law 2:2 lawfully 161:18,20	lawsuit 121:6 219:20 220:1 256:2 269:18 271:8 leader 45:14 leadership 59:13 leading 70:13 268:11 learn 144:5 240:5 learned 11:6 144:14 learning 51:22 52:1 259:21 leave 16:2 224:10,14 225:2 263:10 leaving 15:16 265:1 left 14:4 169:1 188:9 211:13 224:13 legal 133:20 134:21 161:19,21 164:13,15 180:21 185:16 186:3 242:3,20 legitimate 78:7,10 Leslie 132:11,22 letter 25:10,12,13 186:13,15,22 187:1 201:12,14,21 202:18 203:9 204:8,9 219:13 219:13 237:5 254:8,9 254:13,20 272:19,20 letters 198:17,22 243:13 254:18 letting 254:10 let's 23:15 26:10 27:7 27:18 61:22 75:16 99:18 130:20 132:10 133:3,3 161:17 226:11,20 level 101:11 129:7 Lewis 43:3 52:14 193:17 198:1 199:8 237:20 272:6 liability 80:21 Lieu 155:8 267:8 life 204:15,18 205:6,13 206:15,21 227:6 light 93:12 222:18 268:21	limit 52:12 193:19 197:6,8,12 limitation 193:21 198:3,13 limitations 198:8 limited 204:20,21 274:10 limits 196:9 197:1 Linda 56:5,6 97:22 98:6 216:21 line 130:1 143:10 155:17 156:7 158:20 164:3 180:2 202:4 280:6 281:6 lines 37:13 152:18 238:7 lips 135:19 list 156:12 listed 143:18 155:10 155:20 156:16 listen 169:11 lists 28:19 141:22 142:14 147:14 148:11 149:8,8 157:6 litigation 179:5,7 250:12 258:21 little 9:8 13:5 48:20 62:7 67:22 69:4 70:1 71:6,8 119:14 124:20 169:1 212:20 217:8 217:15 222:11 226:20 262:5 live 20:8 LiveNote 3:17,18 8:13 LiveNotes 8:13 living 63:13 103:13 144:21 145:2 load 215:3 loan 166:2,11 221:9,10 221:12,13 236:3 located 21:5 31:9 location 21:11,11 long 19:2,17 20:20 21:19 32:3 36:8 53:13 54:16,22 64:12
---	--	---	--

82:17 91:4,7 92:22 100:4,5,18 113:21 170:16,17 210:9 215:7 223:19 224:18 227:4 246:18,21 248:13,15 264:13,16 264:17 longer 20:11 25:4 64:19 long-time 140:10 look 14:21 21:16 26:19 131:9 134:16 139:8 141:15 142:13 194:7 201:9 223:4 255:11 looked 270:20 looking 28:7,11,12 47:20 118:13 132:3,4 132:6 134:12 143:13 151:18 152:7 167:12 180:12 193:15 196:22 198:5 262:1 269:1,2,4 274:5 looks 142:5 Lord 70:12 125:1 loss 128:6 lot 33:20 72:14 125:2 222:21 224:19 238:7 263:4,5 264:2 Louisiana 16:20 17:13 18:6,7,10,12 211:9 love 270:12 loves 217:17 low 257:11 lower 117:13,15 Lucy 133:9 136:20 137:14 lunch 130:2,4 223:13 luncheon 130:12	135:15 227:4 237:20 277:4 main 76:4,6 77:3,4,5 77:11 116:16 maintain 85:15 majority 230:2 making 40:18 42:14 59:19 60:1 66:20 101:15 125:17 177:7 229:19 MAKRS 226:8 Maloney 3:9 5:4 6:17 6:17 7:7 17:11 26:15 26:18,20 27:6,10,14 27:18,22 28:3 30:13 33:22 34:3,4 41:11 41:18 43:11,15 45:12 45:16 46:3,7,12 47:1 47:8 48:10 49:8 50:12,17 55:1,13,19 58:17,19 59:1,11,18 61:11 63:20 67:8,10 67:13,17,19 68:3 75:14 78:6,13,18 79:2,7 81:8 85:14,22 86:19 87:1,9 88:15 88:19 90:4,6,13,15 94:1,10 97:5,17 102:3,6 105:5,8 106:10,14 107:1,9 108:3,13 111:12,15 112:3,9,10,17 114:19 115:21 120:10,21 129:18 130:4,7,9,18 133:21 134:3,6,8,14 135:4,14,18 136:2,12 136:18 137:20 138:2 138:5 139:21 140:3 141:8,10 143:8,12 144:22 145:6 150:15 150:18 152:4 154:7,9 154:18 158:11,14 160:19,22 161:8 163:9,13,18,21 164:4 164:6,20 168:7,12	169:2 172:12,16 176:12,15,22 178:7 178:10 181:2,3 183:10,12 184:15,21 184:22 188:4,7 190:10,12 191:18,21 192:2 196:14,20 202:7,13,17 205:17 205:21 206:12 208:18 222:6,10,22 223:4,21 224:2,8,15 224:19 225:1,8,12,17 225:21 226:7,11,15 226:18,20 227:16 228:4,11 237:1 238:18 243:17 251:2 268:11 271:17 273:13,16 276:13,16 276:21 man 233:4 manage 67:22 249:4 managed 62:3 229:1,2 229:6,6 management 62:10 73:6,8,9 229:10 259:10 manager 100:3 101:3 101:6,9 manages 264:19 managing 128:21 249:8 manner 248:6 Maranatha 10:19 12:16 March 27:3,4 29:5,8 30:2 37:7 38:21 39:16,21 42:22 44:19 45:3 49:14,19 50:14 51:3,11 52:10,22 57:20 60:3,11 76:1 82:21 84:21 86:14 92:8 94:20 100:6 121:11 126:5,9 138:14 140:18 146:16 149:20	150:21 152:8,8,15 153:5 157:19 159:5 162:20 165:14,18 167:4,15 182:4,12,17 183:5 187:15 190:6 191:9 192:21 201:1,5 220:14,21 221:2 237:9 238:9,16,21 239:1 240:17 245:16 248:18 268:10 Marion 208:11,13,14 mark 26:10 27:7,19 28:15 227:22 marked 27:16 28:2,4 130:15 131:1 148:1 178:15 204:6 228:3,9 237:4 marks 3:3 5:5 6:19,19 17:5,7,9 26:12,17 27:8,12,21 30:11 32:7 41:8,15 43:5 45:9,21 46:4,16 47:7 48:5 49:4 50:10 54:20 55:10,18 58:16 58:18,22 59:5 61:9 63:18 67:3,16 78:3,9 78:14,22 79:5 81:6 85:10,18 86:16 87:5 88:11,17 90:1,10 93:19 97:3,6,14 102:1 105:3,6 106:7 106:22 107:6,21 108:8 111:10,13,20 112:5,14 114:17 115:20 120:7 129:14 129:22 130:6,8 131:20 133:17,19,22 134:6,20 135:12,22 136:9 137:17,22 138:3 139:18 140:1 141:6 143:6,9 144:19 150:13 152:1 154:4 154:14 158:9 160:15 161:2,4 163:7,16,19 164:2,17 168:6,8
M			
Madam 27:6 46:7 67:14 Magruder 5:3 16:12 20:12 78:15 88:14			

172:10 176:7,9,10,13 176:16,18 178:1 180:19 183:8,11 184:12,19 186:13 187:5,9 188:3,15,20 189:19 190:8,17 191:15,20 192:1 196:11,16 202:3,12 205:19 206:9 208:16 222:7,8,14,18 223:2 223:19 224:1,4,12,17 224:21 225:6,10,16 225:19 226:1,13,16 226:19,22 227:3,22 228:6,13 236:21 237:3 238:22 243:15 243:18,19 251:5,6 268:14 271:18 273:15,21 276:11,15 276:20 277:2 marriage 20:14 married 15:18 16:5,7 20:11 Martin 208:15,16,19 Maryland 1:1,17 2:6 2:14 3:6,13 6:8,14 7:13 157:5 209:8,13 209:15 242:7 279:18 Master 142:15 Master's 10:14 12:12 matter 6:4 71:11 207:8 maximizing 129:8 Ma'am 130:22 213:21 McClam 5:3 McCLAM-MAGR... 1:16 2:2 6:4 7:3,8,12 7:14 97:8,15 206:3 206:10 277:8 278:2 278:13 McFarland 13:20 15:11 Mc-Clam 277:4 Meadows 4:3 43:22 44:6,12 46:22 74:3,6	132:11,15,22 133:9 136:20 137:14 139:14 143:1 148:13 150:2 151:5,6 152:10 153:14 155:11 156:13 164:9,22 165:3 167:3 178:18 179:1 184:1,5 192:4 192:10,14 203:16 204:5 237:21 256:4 269:12 mean 9:14 39:11 69:20 76:9 96:10 102:9 104:17 116:9 144:9 190:8 195:16 197:17 198:11 213:9 217:11 217:18 222:1,11 224:5 232:18 236:4 239:13 245:9 246:5 248:16 259:12 261:21 263:15 266:9 267:21,21 268:2 276:21 meant 227:12 media 185:8 meet 29:10 51:5,17 200:20,21 241:18,21 meeting 38:5,8,13 39:12,16,18 40:1,3,4 41:19,21,22 42:3 44:4,10,15,19,19 47:5,11,12 48:2,20 53:9,14,16 54:2,6,8 54:13,14,16,17 55:4 56:10,13,15,19 58:15 58:20 60:11 61:3,5,7 64:5,6,7,8,10,21 65:13 80:4,13 124:16 144:12 146:12 153:12,18 154:3 155:8 164:9,11,12 167:4 169:7 175:22 176:1,2,4,17 184:6 200:2,8 203:1,1,5 211:4 236:17 237:14	237:16 238:14,15 240:18 241:11,17 249:12,13 250:2 267:8 meetings 39:4,5,8 60:16 61:2 81:20 82:4,11 93:16 124:15 172:8 191:8 216:7 218:14,15 234:7,10 234:15,18 239:16,17 246:9,11 248:5 274:14,15,16,18 member 17:17 30:6 38:12 40:17 41:1 45:6 49:11 52:21 55:13 60:13 91:8,14 121:9,10 129:20 140:10,20 163:15 164:1 180:4 182:3,13 183:6 185:15 198:20 199:16 200:11 208:20 212:17 230:17 237:10 239:2 members 37:12,15 49:18 53:17 59:20 97:18,20 99:3 102:12 103:6 148:4 162:17 167:14 185:21 193:14,19,22 196:9 197:1 199:3 237:12 245:1,3 275:2,4 membership 28:20 58:13 memory 241:3 255:8 257:14 mentioned 34:8 137:7 250:17 251:18 253:19 260:1 mentoring 67:22 68:5 68:10,14,22 mentorship 215:4 273:10,17,20 merge 209:17 242:6 merger 242:13,14,18 Merrill 6:22	message 122:22 212:3 262:15 263:1 messages 217:9 met 42:1 82:18 241:11 241:22 263:8 mic 252:19 Michael 126:13 microphone 75:3 145:4 222:17 middle 130:1 mileage 99:13 military 7:16,22 15:21 16:22 211:12 million 169:14 171:21 229:12 230:1 million-dollar 235:7 million-dollar-plus 229:16 mind 94:2 116:13 134:9 181:18 182:2,6 182:11 183:5,13 247:7 267:16 272:2 Mine 37:21 minister 133:9 252:14 ministers 262:4,6 Ministries 1:5 6:5 22:16 28:22 85:6 94:12 145:1 157:12 157:19 159:5 243:3 244:13 267:18 280:3 281:3 minute 28:6 120:20 153:2 194:17 237:2 minutes 44:18,22 45:1 45:4 191:7,11 226:19 Miriam 208:11,11,13 208:15,16,19 Mirian 208:14 misappropriated 165:1 270:3 mismanagement 168:18 169:4 172:17 172:20 175:16 misquoted 263:3 misquotes 263:2
---	---	---	---

misspelled 208:15	260:19	48:4,6,9 59:20 80:14	197:1,4,4,6,8,12
misstate 123:11	move 120:4 126:18	110:5,6 128:8 167:4	198:8 200:15,15
misstates 43:7	235:11	171:14 194:20,22	204:19 206:2,9
mistake 8:19	moved 19:6	196:3 260:17,22	257:12,16,19 258:1
moment 211:1	movement 69:4,18	night 48:15 76:13,13	266:9,12 267:11
Mondays 77:17	moving 175:19 269:3	216:6 253:19 254:6	277:3
monetary 99:14	music 211:16	276:12	numbered 131:4
money 34:17,22 35:4,9		nights 74:22 75:5	numbers 106:11,18
35:22 36:10,13 52:6	N	76:15	117:1 243:13,18
62:1,4,6,10,20 73:13	N 3:1 5:1,1 6:1	nine 23:17	
73:19 74:2,5,13,17	name 5:2 7:10 16:9	Nineteen 20:18	O
74:19,21 75:7 76:17	31:18 40:20 47:20,22	ninety-one 17:6 20:18	O 5:1 6:1
76:19,21,22 77:13,17	47:22 66:2 143:14	nod 8:10	oath 8:4 278:14
78:1 165:4,6,10	147:17 150:5 215:19	nonfactor 66:17	object 41:8,15 43:5,6
169:8 173:17 177:14	233:5,5 241:15 242:3	nonprofit 85:14	45:9 46:16 58:22
177:15 221:18	242:20 243:1 263:22	141:17 147:10 149:3	67:3,16 78:3,22
227:11,12,14,20	named 42:22 99:4	266:13,22 267:4,12	85:10,18 93:19 106:7
229:12 251:11,15	216:1 252:6	Nope 48:19	107:6,21 111:20
252:16 270:1,2	names 110:6,10,17,20	Norma 43:3 52:13	112:5 120:7 129:14
monies 61:13 73:10	111:8,8,16 112:7	193:17 198:1 199:8	137:17 178:1 183:8
75:11,12 76:7,8	123:21 124:3 139:12	237:20 272:6	199:21 202:3 223:11
147:6 212:18 228:18	156:16 193:16	normally 255:7	273:13
247:15,19 250:14	nature 46:11 52:7	northeast 21:7,8,9	objection 45:21 48:5
251:13,21 253:3,3,5	need 8:7 25:9 26:6	notarial 279:13	49:4 55:10 58:16
253:11 254:11,14,17	32:13 68:9 76:12	Notary 2:13 278:17	59:5 86:16 87:5
monitor 6:10 129:7	134:16 224:14,22	279:1,18	88:11 90:1,10 102:1
month 24:14 80:4	225:15,16,17 253:9	note 124:10 143:9	108:8 111:10 112:14
83:11 114:16 207:11	270:11 273:19	notes 21:16 26:2	133:17,19 134:6,21
231:13	needed 25:4 29:15	notice 2:11 41:12	135:12 136:1,3,11
monthly 81:1,4 83:2	33:8 34:10 48:16	53:16,18,20 54:2,6	139:18 143:7,10
88:8 200:21	87:19 213:7,8 215:1	54:17 61:3,5 80:13	154:4,14 163:7,16
months 50:19 58:2,2	270:22 273:8,14,19	80:15,16 153:18	164:3,17,18 168:6
59:3,20 60:1,10,17	273:20	154:1 166:6 167:3	172:10 176:10
76:1 118:6 202:10	needs 68:22	199:20 200:8 237:15	180:19 184:12,19
225:9	neither 132:10 184:1	237:16	196:11 227:16
morning 7:8,9 26:14	224:2 279:9	notices 61:7	268:11
113:9 225:3 226:3	never 33:16 34:8	notified 165:22	obligation 183:19
mortgage 236:4,6	48:22 66:6 81:22	number 6:3,8 28:13	observance 260:19
mother 12:9 145:14	107:2 110:11 144:18	60:22 97:7,14 106:16	observation 261:11,13
270:12 273:18	164:15 165:7 180:9	107:14 131:7 132:10	observe 211:17
Mothers 270:18	180:17 181:6 192:6	133:4,5,16 139:9	observed 104:14 120:5
mother's 57:16 114:20	196:6 212:7,9 214:17	142:13 148:1 158:9	124:12 263:6
219:4 270:18	238:15 246:7 248:2	161:17 172:21	obtain 215:16
motion 144:7	251:15 258:16,18	173:12 174:20	obtaining 89:8
mourning 118:6,8,12	new 19:6 41:13,20	193:14,19,22 196:9	obvious 174:21

<p>occasions 165:8</p> <p>occurred 39:3 54:17 57:12 58:21 235:8,8</p> <p>October 56:17 110:15 113:4 118:11 119:7 128:12,14 144:10,11 155:22 211:6 248:8</p> <p>offended 217:2,3</p> <p>offensive 217:15</p> <p>offer 140:21</p> <p>offering 75:10 77:3,4 77:5 116:16,16 117:7 117:13,14 119:15</p> <p>offerings 76:4,6,9 77:11 81:11,14,16 83:2 165:1 221:19 253:22 254:3</p> <p>office 29:12 31:3,9,13 40:8,10 42:2,8 50:13 51:11 73:12 74:20 75:8 76:18 77:13 92:22 98:12 152:15 165:5,11,12 170:11 212:19 222:2 253:14 254:12,15</p> <p>officer 77:8 79:11 89:13 91:4,5,14,17 91:22 92:17 93:6,8 93:11,17 98:10 103:9 109:7,16 116:20,20 127:22 157:17,22 246:16,19 247:8,12 253:21 279:3</p> <p>officers 78:19 98:4 108:21 157:11 239:17 258:22 259:11,14</p> <p>offices 2:2 256:9</p> <p>Oh 10:8 12:11 28:9 32:21 56:1 64:11 91:18 125:1 160:10 161:6 175:3 176:20 218:5 224:19 257:8 261:4 262:11 264:13 275:10</p>	<p>okay 8:2 9:2,6,8,22 11:22 14:1 15:6,13 16:8,21 17:8,10 18:2 19:17,21 20:6,8,11 20:14,19 21:17 23:16 23:18 25:21 26:1,6 26:19,21 27:11,18 28:19 29:6,16,20 31:2 32:16 37:6 38:18 43:14 48:13 54:21 55:18 60:10 61:10 66:17 70:3 71:15 74:17 76:5 99:1 105:6 107:17 116:15 117:3 130:8 130:19 132:2,9 133:3 133:4 136:19 139:8 150:10,12 155:5 159:9,18 161:16 175:3 176:20 178:11 178:15 185:10 187:20 194:16 208:7 214:7 219:15 221:8 223:11 226:12,22 227:9 243:12,18,21 251:13 268:15</p> <p>old 40:7 275:16</p> <p>omni 71:2</p> <p>once 66:1 269:8</p> <p>ones 197:17 274:13</p> <p>open 171:14</p> <p>opening 231:4</p> <p>operate 238:10</p> <p>operated 168:16 190:13</p> <p>operation 88:22 215:2 249:10 257:21 259:21</p> <p>operations 232:2,9 257:20 258:2</p> <p>operator 6:11</p> <p>opinion 135:17 136:10 136:13 162:4 207:5 233:14 259:3 269:17</p> <p>opportunity 154:2,19</p>	<p>155:3 182:20 199:20 200:9</p> <p>opposed 70:3,9 191:4</p> <p>opposite 43:13</p> <p>oral 249:15</p> <p>Order 159:13</p> <p>organization 68:1,15 69:1,6 120:18 273:17 274:2</p> <p>Organizational 133:6 135:7 139:9 142:20 266:6,10</p> <p>organizing 94:8</p> <p>original 167:14 180:4</p> <p>Orleans 19:6</p> <p>outcome 279:11</p> <p>outside 274:11</p> <p>overall 207:2 211:22 256:20</p> <p>overseas 16:14,15</p> <p>oversee 24:9</p> <p>overseeing 128:15 248:11</p> <p>overseer 177:5,17 231:21 232:3</p> <p>overwrought 270:18</p> <p>over-55 47:16</p> <p>owed 36:22 62:20</p> <p>o'clock 69:7,8,12 72:16,17 75:19,20 113:10,13,18,22 114:2,3,9,13,21 115:7,10,14 116:8,17 117:4,8,14,20 122:13 122:14 222:19 226:12 261:7,16 262:18,20 276:19 277:1</p> <p>O'Malley 188:11</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P 3:1,1 6:1 266:11,16 266:18,19 267:3,5,8 267:13</p> <p>page 5:2,7 131:12</p>	<p>142:19 143:14,18 148:4 155:17 159:16 178:16 188:1 192:5,6 192:15 243:22 269:9 280:6 281:6</p> <p>pages 1:21 131:9 188:1,5</p> <p>paid 22:17,21 92:13 92:16 104:18 189:17 189:19,20 210:16 229:19 230:4 231:8 231:10 236:8</p> <p>paper 37:6</p> <p>papers 32:14,20</p> <p>paperwork 29:15,17 167:7,10 181:7,10 182:9,10 256:7</p> <p>paragraph 132:10 158:7 161:17 164:7 164:21 167:12,13 168:13 178:15 180:2 183:22 185:10,14 269:9,11</p> <p>parishioners 34:20,22</p> <p>parking 125:14,14,20 126:15 127:3,9,14,18 127:19 128:4,16,22 129:3,7,9 247:15 248:11 249:5,19</p> <p>part 70:19,19,21 96:20 104:17 120:18 138:15</p> <p>participate 154:2,12 154:20 162:15 166:1 172:7</p> <p>participated 39:7 164:15</p> <p>particular 259:15 273:12</p> <p>parties 279:10</p> <p>part-time 104:9</p> <p>passage 123:14</p> <p>passages 123:10</p> <p>passed 80:9 93:1 248:8</p>
--	---	--	--

<p>passing 92:22 94:4,5 125:22 201:7 256:1 270:19</p> <p>pastor 4:2 64:6 67:2 68:9 105:2,10,12 109:20,21,22 112:18 112:19,20,21,22 113:3,5,7,8 118:13 118:14 119:20 120:6 120:8,9,11 162:20 168:17 169:6 178:4 179:12 203:3 204:10 205:11 211:15 212:4 213:9 227:10 235:21 244:19 248:16 260:2 260:5,9,11,14,17,20 260:22 265:4,6</p> <p>pastor's 80:2 117:22 118:4,18,21 119:5,16 201:7 208:21</p> <p>patrons 125:20 127:20</p> <p>pay 36:21,21 62:19 64:2 75:9 76:9 173:17,19 174:4 230:22</p> <p>paying 169:13 172:21 173:1,13 229:18</p> <p>payment 99:14 125:18 126:19</p> <p>payments 99:15 125:19</p> <p>payroll 189:5,6 208:9</p> <p>peace 256:12 261:18 261:19</p> <p>Peebles 1:10 4:2 6:6 24:18,22 25:13 30:9 32:9 35:18 37:7 39:17,20 40:13,17 41:5,13 44:15 48:3 50:4,13 51:11 53:7 54:3,7 55:8 56:11,16 56:20 57:8,11,12 59:22 62:3,10 63:21 64:22 65:14 66:13,21 67:1 68:8,21 73:6,15</p>	<p>74:6 75:22 81:18 105:11,12 109:22,22 110:1,7,22 113:4,12 114:12,21 115:6,13 118:4 119:7,16,19 121:4,12 122:10,18 124:6 133:8,8 136:19 136:19 137:14,14 138:12,20 139:13,13 141:20 142:1,1,2,10 142:16,17,22,22,22 143:13 147:15,15,18 148:7,11,12,12 149:5 149:8,9 150:3,4 152:9,15 153:13,15 153:17,22 154:12,19 155:10,10,16 156:7 156:13,14,14 157:7,8 157:16 159:4 162:14 162:15 163:5,10,14 164:8,15,22 165:3 167:17 168:17 169:4 170:4 172:19 175:7 175:14 177:16,18 178:4,11,18 179:1 180:2,9,15,17,20 181:5,19 182:3,12 183:4,6 184:9,17 185:2,18 199:19 200:7,7 201:12 202:9 202:19 203:16,16 204:10,10,14 205:12 205:12 206:14,17 210:13,19 212:2 220:2,9 227:5 228:20 232:4,15 233:13 234:8,10,21 235:13 236:13 244:19 252:7 252:11 253:2 254:6 254:14 256:4 260:2 261:15 262:10 264:5 265:4 266:11,16,18 266:19 267:1,3,5,8 267:13,17 268:22 269:12,17 271:11,15</p>	<p>274:8 280:3 281:3</p> <p>penalties 161:10</p> <p>people 61:3 69:21 70:20,21 71:1,4 73:19 74:11,17,20 76:9,10,11,22 77:1 120:3 121:20 123:19 124:1 163:3 197:12 198:2 204:19 205:1 219:8 253:9 256:6 263:19 266:18 269:19 270:8 271:4,7 272:2</p> <p>performance 71:5 73:8 83:1 93:5,7,17 101:5 119:22 120:6 121:13 258:10,14,17</p> <p>performed 121:18</p> <p>performs 95:5</p> <p>period 50:8,10,12,18 51:3 58:1 77:20 83:19 113:15 118:6,8 118:12 232:21 260:20</p> <p>perjury 161:10</p> <p>permanent 159:14 221:11,11</p> <p>permission 187:3</p> <p>person 30:15 42:14 79:12 80:5 125:6,9 205:9 265:2 275:5,18</p> <p>persona 185:6</p> <p>personal 62:22 63:3 65:8,9 67:17 68:2 71:11,13,14,16,17,19 72:1 80:21 86:7,9 124:10 157:4,6 171:22 172:18 175:8 175:8 180:5 206:19 218:3,5,12 274:12</p> <p>personality 124:21</p> <p>personally 68:6 87:14 202:16 255:2 278:13</p> <p>personnel 14:12,15</p> <p>persons 52:6</p>	<p>pertained 132:1</p> <p>Peters 10:7,22</p> <p>phone 3:7,14 36:4 60:17,20 61:4 206:22 211:5</p> <p>phrasing 178:2</p> <p>physically 109:4 221:18</p> <p>physician 208:21</p> <p>Ph.D 1:16 2:2 10:17 277:8 278:2,13</p> <p>picked 221:19</p> <p>picking 275:2,3</p> <p>picture 262:1</p> <p>piece 37:6</p> <p>pieces 68:6</p> <p>place 6:12 20:16 53:14 54:3,7,14 56:7 64:10 64:13 70:4,4 93:10 118:15 126:1 128:3 129:6 194:20 212:14 213:1 242:8 261:3,4 274:16</p> <p>Plaintiff 1:7 6:20</p> <p>Plaintiff's 228:2 237:5 257:3</p> <p>PLAINTIFF/COUN... 3:2 227:2</p> <p>plan 111:7,16 121:3 226:11</p> <p>planned 233:6 250:8,9</p> <p>planning 191:18 223:20</p> <p>plans 110:14 111:3 118:9</p> <p>play 193:5</p> <p>playful 71:8</p> <p>playing 70:1 71:6</p> <p>please 6:15 7:1 44:9 46:6 54:4,4 135:2 145:5 152:2 160:21 201:2,3 228:1 231:17 237:6 271:9</p> <p>Plf 5:11</p> <p>plot 210:3</p>
--	---	---	---

podium 270:17,19	160:16 189:4 198:17	183:9 185:15 254:2	65:14,20 66:1,10,14
point 47:4 103:18 111:4 265:9	265:14	pre-K 168:19,19	66:17,18 157:4,6
pointed 216:10,19	preparing 8:11,12	Prince 1:1 6:7	235:12,19 236:19
pointing 199:4	26:22 131:21	principal 173:3	proposed 45:1 200:9
police 78:19 275:6,14	presence 213:12	241:12,13,14	protect 34:21 78:1
policies 103:5	present 3:15,17,18 4:1	principles 271:14,15	protected 227:11,15
policy 102:21 103:2	44:13,16 47:11 55:4	271:16	protecting 78:20
posed 135:13	96:11 176:4 199:15	prior 41:1 49:9,12	protection 78:8 80:20
posing 136:11	209:4 225:14 251:12	58:6 80:2 92:22 94:7	provide 34:11 40:6
position 15:10 100:4,6	presentation 154:1	100:15 125:22	230:18
103:21 118:18,21	presented 101:12	138:18 149:19,20	provided 17:22 18:1
119:5,16 141:5,12	126:9,11 152:6,14	150:20 157:19	53:16,18 77:22 88:8
189:11,12,14,17	153:19 192:12 246:2	165:14,16,18 181:12	93:21 95:7
213:6	246:3	215:8 231:15,19	psychology 12:18
positions 22:18	presently 210:8	238:16,21 241:17	public 2:13 13:1,5,12
possibility 181:8,21	213:17	242:17,18 245:16	13:15 15:4,9,16 16:2
182:2,7,11 183:5,14	president 21:21 22:9	259:16 260:3 261:5	45:7 49:17,20 58:13
183:15,21 267:16,20	22:15 34:15 48:18	probability 268:1	59:17,20 60:1 78:17
267:22 268:3	145:17 157:7,7 243:8	probably 67:21 68:14	84:7 110:16 184:11
possible 192:1	244:8,10	69:9,10,11,22 72:13	185:6,8 278:17 279:1
potential 128:6	pressure 257:11	83:16 115:19 219:18	279:18
praise 211:15 212:3,10	presumes 45:10 55:11	222:3 256:10 262:18	publicly 110:11
pray 271:9	67:6 85:12 90:11	276:19,20,22	244:17,20
prayer 22:6 214:5	93:20 107:22 108:9	problem 65:4 171:12	pull 72:14 94:4 201:8
preach 262:12,13	111:21 112:14	223:19	pulpit 69:3,5,16 71:8
preacher 122:11,15	129:15 137:18 154:4	problems 102:11	121:19 122:19
212:5 262:17 265:6,7	163:7 168:8 172:10	124:22 229:3,8,9	217:22 218:2 239:18
265:12	180:22,22	procedural 254:20	240:8 251:19 252:3,9
preachers 114:4,10	presumption 45:22	procedure 75:10	252:11 263:2 269:22
preaches 265:14	46:18 59:8 85:18	80:22 82:14,15 93:10	270:4,15,16 272:1
preaching 121:14,19	86:17 112:6 196:12	118:20 119:21,21	purported 38:15,16
261:15 262:10 264:5	presumptions 90:2	222:2	110:6 131:10 167:9
predate 268:9	presumptively 136:3	procedures 90:20	197:4 202:1,10
prefer 97:1,2	pretty 8:18 62:21	125:17 128:2 129:2,6	215:15
preference 71:12,19	175:5 256:19 274:6	212:13,15,22 248:3	purportedly 121:10
Preliminary 159:13	274:19	249:22 250:4,7 261:3	150:20 201:5
preparation 198:22	prevalent 271:22	261:4	purports 71:18 197:12
207:21	prevented 87:3 90:21	proceedings 172:13	199:6
prepare 89:11,12	90:22 95:17	279:3,6,6	purpose 119:2 252:1
188:15,21	preventing 88:3 89:7	process 78:12 194:15	Pursuant 2:11
prepared 60:4,5,5,8	119:11	194:17	pursue 11:13
82:12 83:22 84:1	previous 33:14,16	Professional 2:12	put 28:15 38:15 39:1
87:16 91:1 122:16	34:6,9 164:14 204:9	program 127:19 233:8	45:10,15 77:1 106:11
131:18,19 138:19	previously 99:1	proper 127:19	128:3 145:15 179:12
	126:12 135:13 178:3	property 65:8,9,10,13	186:15 191:19 204:3

217:21 222:16 240:7 261:3,4 269:20 puts 121:22 putting 179:17 225:9 Pyles 56:5,6,6 97:22 98:6 216:21 P.A 2:3 3:10 p.m 97:12,16 130:11 130:13,13,17,19 206:5,7,7,11 277:6,9	246:22 247:7 quick 26:18 205:20 269:3 quickly 266:4 quit 264:11 quite 104:6 171:7 264:7 quote 164:7,9 215:16 261:8,8	136:4,6 139:15 142:7 143:3 147:19 148:15 148:16 149:13 155:13 156:2,17,20 157:10 158:2 159:3 162:1 163:22 170:13 203:20 248:21 280:6 281:6 reasons 112:12 135:12 154:15 183:9 184:20 196:3 recall 21:15 29:7 31:1 43:21 44:1,3,4 47:20 50:22 51:2 52:18 53:12,15 60:13,15,16 60:19 61:20 110:22 124:2 201:14,16 207:8,11 214:22 218:6 231:14 233:12 233:13,19 234:17 235:4 236:12,16 238:2,3,5 240:11 241:8,14 263:22 receipt 272:10 receive 99:3,6,12,19 101:20 190:4 254:2 received 23:21 24:13 88:14,18,21 90:17 98:17 99:2 121:11 166:6,10 213:1 247:14 253:22 255:17 receives 98:18 receiving 24:7 103:7 189:7 receptionist 208:7 recess 97:11 130:12 206:6 recollect 116:1 recollection 30:14 43:16 47:9,10 110:12 110:18,20 115:17,22 116:1 record 46:9 47:13 67:15 97:9,13 130:11	130:16 152:2 206:4,8 277:5 279:5 records 14:21 94:12 94:16 256:8 Redirect 276:17 Redskins 125:13,14 125:14,17 126:15,18 127:3 128:16,22 129:13,20 reduce 241:9 reduced 279:7 reelected 237:12 refer 131:5 164:10 243:10,20 257:3 266:3 reference 120:14 referred 218:19 referring 26:8 28:6 50:11 52:13 82:22 102:2 105:10 131:6 150:16 158:10 275:8 refers 158:4 reflected 157:1 refused 120:16,22 regard 125:13 206:20 regarding 78:16 185:19 230:8,16 231:1 232:16 233:14 234:8,13,16 242:3,19 246:22 254:6 260:17 261:15 264:19 Registered 2:12 registrar 22:4 173:4 regular 75:18 116:16 reimbursement 99:7 99:13 102:22 103:3 reimbursements 101:20 103:7 related 279:9 relates 155:8 relating 62:10 relationship 114:20 125:13 166:13,17,21 170:6 relief 159:14 178:21
Q	R		
quantities 147:7 quarter 83:16 84:19 88:10 89:1 90:18 quarterly 83:6,7 88:8 95:1,8 question 8:6 9:3 28:12 28:13 38:17 41:9,16 43:6,10,12 45:9,11 46:6,8,17,19 50:18 58:12 59:2,8,10 60:7 62:7,8 67:4,6,12,13 73:7 78:4 85:11,19 86:16 87:6 90:5 93:20 96:13 106:8 107:22 108:9 109:3 110:19 111:21 117:16 129:15 132:7 134:4,8,10,16,21,22 135:3 137:18 138:18 139:3 158:13 160:10 162:8 173:22 178:2 180:21 181:1 194:22 196:19 200:16 202:4 212:20,22 222:3 223:17 248:21 264:18 271:17 questioner 222:15 questioning 121:22 130:1 143:10 164:3 222:12 223:10 questions 8:3 78:16 181:18 222:7,9 223:7 223:7 224:22 246:6	R 1:10 3:1 6:1,6 185:18 280:1,1,3 281:1,1,3 raise 74:17 123:16 134:20 181:18 182:2 182:6 183:4,13 247:6 raised 76:8 91:15 123:18 212:18 247:20 251:13,15 ran 229:15 245:18 range 106:12,15,18,20 107:14 ratified 45:2 react 114:8 read 46:8,9 67:13,15 131:15 147:17 158:21 198:11 278:3 ready 27:11 215:3 273:19 real 26:18 269:3 270:20 realized 11:9 realizing 209:19 really 12:11 30:16 45:13 55:2 64:11 71:12 104:19 109:14 116:3 151:9 177:21 221:20 265:20 274:14 Realtime 2:12 reason 40:16 67:1,9,17 67:18,19 73:7 88:7 89:4 112:11 133:15 134:5,18 135:5,10,21		

rely 259:15,20,22	249:14,15,19 259:1,4	213:5	248:10
remain 45:19 77:19	259:5 266:13,21	resignation 198:17,22	rest 193:15
195:1	267:4,12	199:7 272:12,13,18	Restraining 159:13
remained 18:7 81:17	reported 1:22 108:6	272:19	result 128:7
117:19 127:5	253:15,16 259:7	resignations 52:9,16	resume 276:16
remaining 127:11,16	reporter 2:12,13 6:21	151:11,14 198:5,21	retained 5:6
remains 116:14	7:1,10 8:11 26:11	272:5,10	retired 19:20,21
199:15	27:7,11,16,19 31:21	resigned 52:17 132:14	retirement 20:3
remember 10:9 14:14	46:7 67:14 279:1	193:15,18 197:5,22	return 255:3 280:5
14:20 18:18 21:12	reporters 8:18	resigning 157:17	281:5
24:5 30:12,16 31:15	reports 82:22,22 83:4	resistant 124:20	returned 211:13
31:17 32:4,6 36:7,8	84:21 87:10 88:6,22	resolution 80:9,11,12	returns 85:2,7 86:5,10
42:16 53:21 54:9	89:5,8,12,20 90:8,17	96:21 132:12,17	86:15 87:4 254:22
57:2 61:1,8 63:19	90:22 93:12 109:13	133:6 135:8 138:15	revenue 107:20
64:11,14,20 76:16	117:1 127:8 172:4	138:19,19 142:14	125:14 127:3,5,9,10
110:8 113:20 122:5	212:14 213:2 246:1,1	148:2 152:3,5,7	127:15,20 128:7
122:20 123:12,15,21	246:3,4 247:15 248:4	153:15,19,19 154:2,3	129:8 247:19 248:11
126:2 145:11,12	249:19 250:1 255:20	154:13,21 158:5,15	249:9,20
150:9 153:11 170:5	represent 6:16	159:7 164:16 182:5	reverting 125:18
173:11 176:6,8	representation 189:20	184:3 187:22 188:13	review 8:15,16 92:9
186:14 194:5 199:10	representative 161:21	188:14,16,21 192:3	93:2,7 129:13 203:8
199:12 207:3,4 212:8	representatives	192:10 199:5,20	258:16
212:9,12 215:6,21	161:19	200:3,9,10,13,14	reviewed 93:18 100:16
216:8 217:11,15	representing 191:1	204:4 243:20 266:7	101:5,9 246:1 258:10
230:3 233:5,11	represents 185:7	266:11 267:2 271:10	reviewing 180:14
236:14,14 241:6	request 151:8 251:17	Resolutions 266:17	reviews 129:3
254:10 256:9 264:2	252:21 253:3 272:9	resolved 213:21 214:2	Ridiculous 271:17
274:21 275:13	requested 249:18	respect 38:11 61:12,22	right 15:9 23:20 25:19
remove 41:4 262:10	requesting 254:14	63:22 66:13,20 73:5	26:17 27:6 29:4
262:14	required 96:6,14	88:6 105:9 106:11	30:14,17,20 31:18
removed 168:17	174:4 237:16 255:3	109:15 125:2,4,6,8,8	33:18 38:2,4,20 39:3
175:15	requirement 96:20	127:8 146:4 158:3	42:18 43:19 47:21
render 136:10	requires 215:16	190:3 192:3 213:4	54:10 55:14 56:2,16
renting 103:17	reservations 68:8	respond 8:4	56:19 57:4,10,18
repeat 8:6 44:9 46:6	reserve 223:9	responded 178:3	58:1 62:7 65:19
196:18 201:2 231:17	residence 20:9 50:15	Response 5:8	66:18 68:16 71:19,22
rephrase 9:4 38:17	51:4,13 57:13 144:11	responses 8:10	72:2,22 73:5 83:18
90:4 194:22	146:4,5,10	responsibilities 51:20	86:7 90:19 100:11,21
replace 56:20	residences 22:13 47:6	52:2 104:4 147:2	103:20 105:7 109:3,9
replacement 55:7	47:13,15 105:19	responsibility 86:18	112:19 117:16 120:3
report 82:16 83:6,7,22	146:14 147:1 211:5	86:20 89:10 91:4	121:4,9 123:22 124:9
84:19 87:19 88:14	221:7,16	108:15	125:5 126:2 129:2
89:1 141:17 147:10	residency 58:14,20	responsible 52:5	130:9 132:5,5 137:13
149:3 156:5 157:4	60:11	126:20 127:14,18	138:9,12 139:2,4
246:7 248:2 249:12	resign 157:21 198:2,10	128:20 147:6 235:5	143:9 153:4 158:20

160:7,19 161:7 168:14,20 173:10,12 175:18 183:16,18 189:14,16,19 190:1 190:14 195:11,22 196:3 201:18 219:1 221:13,14 222:5 223:5 225:1 226:7,15 228:8 229:7 230:19 233:16,18 241:10 251:20 259:6 266:1 right-hand 149:6 156:6 Robert 47:19 role 63:21 91:13 93:11 126:5 131:21 146:2,3 151:11 176:16 177:1 191:4 193:5 198:20 214:14,15,17,19 231:18 232:1 243:7 rolling 270:16 room 22:6 43:9,13,14 43:17,20,20,22 44:2 210:7,10 241:12 RPR/CRR/CLR 1:22 279:2 rules 8:22 run 35:9,22 108:15 150:10 running 122:3 124:2,2 124:6,6,14 127:18 171:11 205:16 231:15,19 runs 108:20 109:10	92:3,9,12 93:3 99:6 100:11,14,16 101:11 189:7,13 190:4 231:9 258:10 salvage 171:3 satisfied 250:2 Saturday 239:16 saw 37:18 137:6 150:2 150:5,7,16 153:9 172:1,2 173:21 192:5 192:6 205:7 206:14 saying 34:10 72:6 123:7 124:5,8 143:22 145:12 179:16 184:5 202:22 229:5 262:17 265:22 says 73:22 150:16 158:7,19,20 167:13 188:8 204:13 217:12 217:19 Scafford 84:1,10 95:6 scale 169:19 170:1 172:9 233:14 scaled 168:19 174:19 190:8,9,16 scaling 230:16 231:6 231:15,19 232:16 233:20 234:1,13,16 241:20 scanning 116:13,13 schedules 225:7 scholarship 173:6 scholarships 233:1,3,6 233:9 school 9:13,14,15,17 9:20 10:1,6,7 13:8,12 13:21 15:4,9,16 16:3 24:9 25:9 168:18 169:20,20 170:1,9 171:2,8,12,14,19,20 172:5 173:1,20 177:4 177:8,11,14 187:18 190:11 228:22 229:2 229:13 231:1,2,3,4,6 232:8,16,20 233:15	234:8,13,16,22 241:9 241:20 schools 12:20 13:1,6 scripture 263:2,3 seal 279:13 search 119:1 seat 55:8 second 34:15 142:18 159:12 161:4,6 192:5 236:4 262:15 secondary 11:15,17,20 11:21 seconds 205:18 secret 45:19,22 46:2 179:9,11 secretary 11:9 98:7,14 103:20 104:5 105:22 141:1,7,12,12 157:8 173:4 192:21 193:11 203:13,14,17 210:13 section 194:5 secured 78:11 security 77:22 78:5,16 274:22 275:4,8,14,18 see 26:8 29:11 30:8,22 39:20,21 74:11 83:8 106:11 133:11,13,14 148:5 149:11 151:17 153:5,10 156:8 165:8 167:6 168:20 172:4 173:20,22 174:3,5,6 175:19 183:1 184:7,8 195:16 203:18,20 204:14,16,17,20 205:2,5,11 215:18 225:12 237:22 268:15 274:21 seeing 31:15 134:12,13 182:9 199:12 seen 40:20 82:21 83:4 83:6,6 84:21 85:2 95:2 104:6,12 116:22 127:8 165:7,10 167:21 181:7,10,14 181:16,17 182:10	183:3,3 195:8,10,13 195:18 197:11 198:15,16 211:21 218:7,10,13,19 251:15 253:2,5 select 84:13 selected 55:7 201:5 selling 250:21 Senior 144:21 145:2 155:9 158:4 sense 202:4 sent 25:10,11,13 61:7 202:8 203:6 215:19 229:20 254:8,13,18 separate 243:3 September 83:19 142:5,21 143:20 147:14 148:2,16,21 202:8,18 203:15 211:6 219:12 serially 131:5 series 8:3 52:9 sermon 263:7 265:14 sermons 264:6 265:21 serve 30:6 32:18,19 33:2,5 109:16 168:2 181:19 197:12 210:12,13 247:11 served 58:3,9 180:9,17 181:6 185:15 186:3 219:4 service 16:22 29:21 30:1 70:6,12 72:13 72:17 75:20 107:20 113:10,13,19,22 114:3,3,5,9,13,22 115:7,10,14 116:8,17 117:4,8,20 121:17 212:10 261:7,16 262:18,20 264:6,8,13 264:17,19 274:11,11 services 18:1 19:14 20:5 25:4 69:2,7,8,10 69:16 72:3,15 113:9 169:21,22 211:15,17
S			
S 3:1 5:1 6:1 237:21 280:1 281:1 safe 77:21 salaried 98:19 102:8 189:11,14 273:1 salaries 99:8 230:3,4 232:9 235:10 255:5 255:13,16 salary 91:17,18,19,22			

212:2 220:16 229:18 264:21 274:5 servicing 25:9 32:21 102:11 248:14,16 260:14 set 5:8 52:7 92:3,6,19 100:11,15 118:21 191:3 224:3 237:14 279:12 sets 27:9,12,21 100:14 Seven 194:2 seventies 21:15 sexual 217:8,14 263:16 shaking 225:13 Shame 270:10 271:1 share 36:15 shared 37:2 170:18 264:4 sharing 179:4 250:3 sheet 278:7 short 224:6 226:8 shorthand 11:6 279:1 shortly 56:20 57:1,12 show 83:1 127:9 147:8 149:1 150:14 159:11 187:22 194:6 200:22 201:9 223:12 226:20 showed 169:8,8 showing 27:14 28:4 148:1 156:5 168:13 178:15 179:22 199:5 202:18 203:12 204:6 237:4 side 19:10 sign 29:15 32:13,19 37:7 48:17 50:16 64:21 65:16,18 96:8 96:15 131:10,15,16 152:18 153:20,20 159:21 163:5,10 192:10,16 237:22 signatories 79:17,17 79:22 80:19 signature 37:14 80:5,8	80:10,14 96:7,9 131:13,14 139:20 140:7 141:20 142:11 142:12 143:13,16 148:7,9 149:6 155:17 156:7,10 159:19,22 167:6,9 180:15,20 183:4 277:7 278:10 280:22 281:22 signatures 37:13,15,19 96:1,5,13 133:13,14 135:11,21 136:5,14 139:12,13,17 142:18 143:4 147:21 148:6 148:18 149:15 152:9 155:14 156:18 166:2 195:16,19 268:16 269:2 signed 29:17 37:11,12 37:13 38:1,14,22 40:11,18 48:16 50:5 50:13 57:20 60:3 64:6 86:5 133:8 140:19 142:21 151:1 151:7 152:20 160:12 162:5 163:4 182:5 184:5 192:4 202:19 204:5 237:7,17 238:2 266:11,16,17,19,22 267:2,5,8,12 278:7 signers 96:9 signing 42:14 64:8 96:2 160:8 207:21,22 238:5 simple 136:16 singing 122:21 212:3 212:11 sir 94:2 sitting 270:15 situation 125:18 126:18 127:15 128:16,22 129:7,13 129:20 256:10 six 50:19 58:2 225:9 251:5	size 68:1 sketch 28:16 slide 168:22 slightly 178:6 slipping 130:20 small 188:9 210:14 Snyder 126:14 social 11:16,18 12:10 15:15 sociology 15:15 sold 251:8 solely 166:2 256:6 266:19 solemnly 161:9 solicited 151:13 solidify 179:19 solving 171:12 somebody 25:8 75:9,9 222:11 228:12 237:1 264:11 someone's 33:21 somewhat 42:3 52:7 232:7 son 275:10,11,12,16 275:22 276:5,9 song 263:17,18,19,21 soon 192:1 sorry 23:15 33:20 50:10 58:22 75:4 105:3 110:19 112:7 133:18 141:6 144:19 145:3 158:9 160:10 160:17 188:3 194:15 227:22 228:14 229:4 238:4,10,18 246:4 248:18 251:7 255:22 257:8 265:19 269:6 South 9:12,19 southwest 37:5 62:12 62:16 63:22 65:14 66:18 speak 42:12 135:19 165:17 speaking 136:3 202:16 specialist 18:16	specific 30:4 62:8 123:10 specifically 32:10 34:13 62:2 172:18 specifics 174:9 speculation 106:9 184:13 spell 31:21 spend 228:18 spending 61:13,15 spent 36:11,13 62:6 177:14 spin 179:12,14 spirit 70:13,14 265:11 spoke 252:19 sports 233:8,8 Sr 1:11 3:3 4:2 6:6 35:18 40:13,17 41:13 44:16 48:3 57:11 62:3 63:22 64:22 65:14 66:14,21 67:2 68:8 73:6 74:6 75:22 119:16 121:4,13 122:10,18 133:8 136:20 138:12,20 142:1,17 143:1 148:12,12 150:4 153:15,17,22 154:12 154:20 155:10 157:8 157:16 159:4 163:14 167:17 169:4 172:20 175:14 180:2,9 183:6 184:9,18 185:2,18 199:19 200:7 201:12 202:9 280:3 281:3 stadium 129:9 staff 18:17 89:10 176:5,5 201:13,22 220:14,15 stand 71:4 72:14 74:18 180:8 181:4 standing 30:20 252:13 start 13:14 94:3 106:12 118:13 222:20 223:12 224:9
---	--	--	--

225:3 226:16 231:8 233:22 264:14 271:4 started 13:8,20 23:9 24:1 114:3 122:13 201:7 223:14 250:7 starting 226:11 268:10 state 2:13 6:16 17:9 43:8 87:20 123:7 161:18 164:7,21 185:13 279:18 stated 107:7 111:18 123:3,4 135:15,16 183:9 227:9 244:18 245:16 255:22 261:7 statement 35:8,21 63:14 73:1 88:10 132:2,6 180:8,16 181:4,5 186:2,5 256:15,16 269:16 270:4 statements 88:9 161:15 173:21 178:17 217:22 218:2 states 16:17 18:19,22 168:14 188:12 204:8 status 66:9 88:1 166:11,16,16 185:19 214:15 255:1 stay 224:4 stayed 116:11 stealing 270:1,2 stenographically 279:7 steps 102:7,9,10 108:4 115:10 stipend 22:19 23:21 24:1,8,12 25:2 98:16 99:1,13 231:9,11,12 stop 67:7 112:7 113:18 113:21 151:6 163:14 186:15 190:4 270:11 stopped 114:2 150:22 186:8 Stream 3:17,18 Street 14:7 21:12 37:3	210:15 stretch 224:7 strike 30:7 105:21 204:6 215:12 238:10 245:2 255:22 students 17:18 studied 265:10 studies 11:13 15:15 122:16 study 12:7 121:22 stuff 18:17 72:10 262:21 263:1 subject 61:3,5 207:8 235:19 236:1,2 submit 250:1 submitted 127:22 165:11 subscribed 278:15 successor 132:12,13 132:21 184:2 199:7 sue 1:22 2:11 6:22 270:13 279:2 suffer 178:21 sufficient 196:5 suggest 136:14 suggested 24:16,20,21 suggesting 43:12,13 suggestions 214:4 suing 270:11 Suite 2:5 3:12 Sunday 29:21 30:1 69:11 74:5 75:16,18 77:12 81:10 116:16 120:2 122:9,20 165:10 221:19 251:12 264:9,21 270:9 Sundays 76:6 77:3 122:20,21 262:6 superintendent 232:8 supervision 279:8 supposed 121:21 223:15 supposedly 49:19 82:20	sure 7:12 9:5 12:21 13:19 21:20 26:3 52:18 54:21 63:15 71:3 80:11 83:11 92:19 94:18 97:5 104:6 105:5 112:2 114:16 115:4 117:9 118:14 127:7 130:4,7 138:16 140:14 142:6 143:8 164:4 176:12 185:4 193:9 195:13 195:14 205:21 208:5 211:19 213:1 214:5 215:22 227:10 229:4 229:19 234:19 237:1 251:9,10,20 253:13 255:12 259:13 270:7 surprised 49:1,7 217:5 surrounding 207:18 sustain 175:9 sustainability 175:2 swear 7:1 swore 161:15 180:5 sworn 7:4 181:5 system 7:22 15:4,7,9 15:17 16:3 95:21 275:14 <hr/> T <hr/> T 5:1,1 280:1,1 281:1 281:1 tab 131:8 133:4,5,16 135:8 139:9 141:15 147:8 148:1 149:1 151:18,19 155:6 157:3 158:3,9,11,20 159:11 180:13 183:1 193:15 194:6 195:6,9 196:1,5,8,8,22 199:5 200:22 201:10 202:18 203:12 266:12,16,21 267:1,3 267:7,11,14 269:4,6 269:9 tabbed 5:10	tabs 131:4,6 266:18 take 20:16 21:20 26:18 27:18 50:6,19 51:9 53:14 54:14 56:7 64:10,13 66:14 74:1 97:3 114:21 115:6,9 115:10,12 118:9,15 125:12 126:1 130:2,4 134:15,15 139:8 141:15 142:13 191:18 199:14 205:18,19 215:3 224:12 226:16,18 245:11 252:21 259:14 263:9,11 264:1 taken 2:2 7:15 8:20 31:2,4 41:4 44:18 73:10 86:13 87:21 102:7 108:5 116:17 125:15 129:11,12 165:10 241:1,8 242:2 242:19 243:5 250:19 251:11,21 253:5,12 261:16,17 279:4,6 takes 77:2 talk 9:9 59:16 61:22 146:3 224:20 241:18 241:21 246:5,8,10 247:22 249:7,8,12 264:8 275:8 talked 33:7 36:4,9 48:20 89:21 144:8 206:22 211:6 232:19 241:19,22 247:18 talking 15:8 30:21 34:19 58:1 69:6 74:9 75:15 109:21 144:20 145:1 153:7 187:19 209:19 217:12,17,19 218:3 219:8 220:7 221:13 234:3 239:18 243:15 249:21 263:16 tape 97:7,14 205:16,18
---	--	---	--

206:2,9	Testament 207:15,19	thought 11:8 62:17	171:2 173:3 174:9,10
taught 12:10 13:5 22:1	testified 7:4 231:20	182:8 209:14 215:1	175:5 181:9 182:15
tax 85:2,7 86:5,10,14	testifying 78:13	216:14 217:7 219:16	182:16,21 186:8,16
87:3 254:22 255:3	testimony 43:7 59:7,9	270:14 275:1,1	189:3 190:15,16,18
Taxation 157:6,13	88:13 132:15 135:18	thousand 23:17 24:14	190:21 191:2 195:11
taxes 236:9	175:14 182:16 186:7	106:12 231:13	198:20 205:19 206:4
tax-exempt 254:22	187:14 199:14 212:6	threatening 256:6	206:11 210:19 211:7
teachers 14:22	268:5 278:4,5	three 54:18 68:16,18	215:9 217:19 218:6
teaching 15:10,13	testing 106:10	68:19 76:15 82:19	223:5,16 224:3,5,6
212:4,5	thank 28:19 249:16	96:7,15 102:8 131:9	224:10,13 225:22
team 246:9	251:3,5 265:7	139:12,13 181:1	226:9,18 230:6 235:1
telephone 51:6	thereabouts 58:3	207:2,9 234:17	235:2 236:16,17
telephonic 39:5 53:21	thing 226:3 228:22	254:16	240:17 245:12
54:9 61:8	236:8 256:12 264:14	three-minute 205:21	248:20 250:13
tell 7:10 9:8 21:17	things 62:8 68:13 69:2	thrown 120:20	252:22 253:10
29:4,6 32:17 33:1,4	71:11 94:4 121:18	thumbnail 28:16	255:15 258:20 261:1
33:10 34:12 35:3	122:6 171:1 201:8	Thursday 224:11	264:2 268:9 270:16
37:22 45:13,14 47:9	214:11 217:12 226:9	225:5	276:14 277:5
62:2,15 87:18 106:17	240:1 263:17 267:22	tie 36:10	timely 86:14 87:3,22
107:10,12 111:3	269:17	Tim 43:5 105:3 222:15	213:2
112:11 115:16 123:6	think 14:14,17 17:3,4	236:21	times 123:1 124:10
145:7,13,16,20 146:1	21:2 23:6,11 24:1	time 6:10 8:5,7 14:7	207:2 240:1 254:13
151:22 182:20	25:17 34:3 47:3	20:2 21:6,19,20 25:5	254:16 265:13,18,20
187:20 191:15 205:7	48:15 61:8,20 67:21	27:20 29:1 33:3,4	Timothy 3:9 6:17
209:11 212:17	68:5 69:3,14,14,22	34:5 38:21 40:8,11	tired 72:13 262:15,19
213:10 214:22 215:5	70:16 71:6,10,10	40:18 42:9,11,19	title 14:14,21 145:21
215:12 217:10 223:2	72:8 80:20 81:4 84:5	44:21 46:13 50:3,12	145:21 146:1 193:9
226:2 239:19 249:18	84:5 87:20 122:12,14	50:19 51:3,10,12	232:4 243:22 244:1
271:7	151:21 170:9 179:4	52:21 61:21 63:13	260:4,6
telling 49:15 59:3	179:14 191:13 193:7	65:19 67:21 68:11,12	titled 66:1
78:14 170:14 270:11	207:2 210:22 211:3	72:9 77:10,15,20	titles 18:18
276:13	222:6 224:17 232:12	82:5,7,10,12 83:9,21	today 6:11,22 8:2 52:4
Temporary 159:13	242:22 250:21 251:9	84:20 92:22 93:14	107:2 146:10 164:1
terminate 7:20	261:22 262:3,4,15,15	96:2,4 97:3,9,16	181:8 182:9,19
terminated 165:19	263:12 268:4 269:22	102:2,3 110:5 111:6	199:15 209:4 222:20
168:3 213:5 220:15	271:3,21 274:12,21	111:18 112:16	223:1,3,5,20 224:10
272:21	275:17 276:7,11	113:16 114:12 118:5	226:2,4 276:14
terms 66:18 114:8	thinking 23:7 69:9	118:7,22 119:3,6,14	today's 6:9 8:15
117:17 118:17	72:4,7,9 92:6 114:16	123:17 124:4 128:17	told 21:2 42:18 48:11
121:13 128:21 218:8	197:17 232:22 233:2	129:10 130:11,17	48:14,21 49:10 50:3
218:11	239:21,22 240:2	132:16,19 134:12,15	50:15 51:6 58:12
Terrell 43:3 199:9	thinks 136:4	134:15 137:5 138:13	59:15 60:12 62:11
237:21 272:7	third 83:16 84:19	138:18 144:2,4,14	63:8 85:21 86:1
Terry 1:22 2:11 6:22	88:10 89:1 90:18	146:7,9 151:1 156:3	87:13,15 94:22 95:3
279:2	Thirty-six 243:11	157:12,21 170:16,17	95:9 98:16 116:18,19

116:22 120:18 121:5 144:17 145:14 162:2 162:7 171:20 173:2 192:14 197:8 198:2 202:9,12,13 213:8 219:6,7 227:10 253:14 263:22 270:6 271:1 tomorrow 222:20 223:10 224:9 225:14 226:12 276:17 277:1 top 76:16 107:16 123:22 126:2 total 117:18 totaled 15:3 106:3 totally 124:18 Town 76:10 122:7 250:17,20 251:8,14 251:19 train 18:17 training 22:1 67:22 68:5,10,14,22 215:1 215:3 273:8,16,20 transcript 8:12,13,14 8:16 279:5 transcription 8:17 278:5 transmission 8:13 transpired 61:18 151:9 262:2 travel 16:16 traveled 15:20 traveling 16:13 211:11 treasurer 157:9 246:19 trick 43:12 Trinella 47:21 Trinity 10:14 12:4,7,9 12:13 trouble 66:2 222:22 true 98:22 161:11 171:22 177:8 200:22 201:4 202:11 214:12 247:6 278:4 279:5 trust 249:4	trustee 5:11 32:14,18 32:22 33:2,5 38:6 40:19 41:2 42:7,15 48:18 49:16 50:4,7 50:20 55:21,22 60:14 98:13 108:17 132:13 132:18,21 138:12,14 138:20 139:5,5 143:14 144:3,5,15,19 148:8 149:21 150:20 150:20,22 151:6 157:17,22 159:4 170:11 184:2 187:12 199:3,7 214:15,18 238:1 239:4 240:16 240:18,20 244:4,6 245:13 267:17 268:10,22 trustees 1:3 6:5 22:10 22:12 28:20 29:2,13 30:7 33:15 34:7,9 38:5,12,13 39:1,4,18 40:3,5,7,10,14,17 41:1,5,13,20 42:22 44:5,8,11,11,20 45:3 45:6,19 48:4,6,12 49:11,12,16,19,21 50:7 52:12 55:9,14 58:4 60:13 91:9,14 97:19 99:4,5 100:7 102:8 107:17 110:5,6 110:11,17,21 111:4,8 111:17 132:12,16 133:1,10 136:20 137:1,3,4,15 138:6 140:5 142:21 143:15 143:19 144:1 146:22 147:1,3 148:5,11,21 149:10,17,19,22 153:13 154:22 155:21 156:3,22 158:6,16 160:5 163:15 164:1 165:14 166:4 167:13,15 172:7,13 180:3,4,10	180:17 181:6,20 182:4,13 183:7 185:16,18,20,21 186:4,9 188:14,16,22 189:3 191:8 193:22 196:10 197:2,5,6,8 197:13 198:9 199:16 199:22 200:3,5,11 205:10 218:20,22 237:13,14 238:21 244:18,20 245:4,17 256:22 257:8 280:2 281:2 trusts 239:12 truth 278:14 try 130:20 175:8 256:12 trying 14:14 29:9 36:7 56:3 94:4 122:5 152:22,22 179:18 186:14 216:7 224:6 226:8 262:10,14 Tuesday 77:18 tuition 230:2,2,3,4 232:10 235:10 turn 7:13 131:8 turned 73:11 76:17 165:4 250:15 253:20 254:11,14,17 tutelage 215:15,16 twenty-five 226:19 two 23:17 68:13 69:9 72:2,15 76:15 80:18 96:13,16,18,22 146:19 180:21 188:1 188:4 191:1 209:17 211:19,20 214:11 215:8 225:4 242:6 243:3 two-page 155:7 Two-Year 141:17 147:10 149:3 156:5 266:12,21 267:4,11 type 27:19 188:9 229:22 236:2 253:8	257:6 typewriting 279:8 typo 160:16 <hr/> U <hr/> UDC 11:11 12:1 uh-huh 8:1,10 9:13 10:3,5,8,10,10,13,16 10:18,20 11:3,5,12 11:21 12:3,3,8,9,12 12:14,14,17,19 13:2 13:4,7,10,14,16,22 14:3,5,8,9,13,16,18 15:1,2,16,19,22 16:1 16:5,11,13,16,19,21 17:1,20,22 18:3,8,9 18:13,15,19 19:1,4,7 19:9,12,15,16,19 20:1,22 21:3,5,8,10 21:14,18,21,22 22:3 22:5,8,11,14,14,20 22:22 23:2,5,10,12 24:3,5,10,12 25:2,6 25:11 26:5 27:5 28:14,18,21 29:19 30:1,5 31:6,11,12,16 31:19 32:2,22 34:21 35:12,14,17,20 37:11 38:1 39:2,7,22 42:6 42:20 44:22 47:17 51:2 52:1,2 53:13,20 56:18 57:6,9 58:11 63:10 65:2 68:19 69:17,19 72:12 74:14 75:17,21 77:22 80:3 81:21 84:10 89:17 91:8 94:14 96:19 98:8 99:10 107:3 109:12 113:14 114:14 118:2,20 122:1,4 128:13 137:10 138:17 139:11 141:16,19,21 142:3 144:13 147:9 147:12 149:2,12
---	---	--	--

151:20 152:12 159:1 159:10,15 162:3 167:16 168:21 171:9 172:3,6 174:22 179:21 180:1 181:17 182:18,22 184:8 185:12 186:6 188:2,6 188:19 189:10 193:20 194:18 197:19 198:6 199:18 201:11,17 202:21 204:12 212:16 214:8 214:10 215:20 217:4 219:2,14 221:4,14 227:13 229:7 230:5,9 230:19 231:22 235:14 236:11 238:8 239:3,10 243:9 245:15,21 246:17 247:5,17 248:10,17 249:11,17 250:16,18 254:4 255:12,21 256:3 257:5 258:12 259:2 261:9,20 265:8 266:8,15,20 267:6,10 267:19 268:17 269:5 269:7,10,15 271:13 272:4,8 273:9,11 276:1 ultimately 177:15 240:2 unanimous 155:7 167:14,17 267:7 unaware 184:6 understand 8:5,21 56:3 60:7 138:16 146:19 182:16 210:3 235:1 265:5 understanding 56:12 146:21 147:4 234:20 235:2 understood 38:22 unfocused 265:22 United 16:17 18:19,22 University 10:11,15	unnecessarily 36:11 36:14 unprepared 122:18 unusual 222:11 Upper 22:6 210:7,10 upset 270:9 275:1,20 use 223:5,6 228:8 uses 188:10 215:15 usher 21:21 usually 8:18 72:16,20 73:2,3,4 77:4,7,17 239:8,9 240:7,8 249:11 264:10 <hr/> V <hr/> v 1:9 280:3 281:3 vacancy 55:20,21 119:9 vacant 118:1,4,18 valid 203:21 validly 195:12 van 251:14,16,19 various 146:18 verbal 8:9 249:14 verbatim 254:10 versa 69:12 version 44:12 194:8,11 194:19 195:2,4,18 versus 6:6 vice 22:9,15 34:14,14 48:17 49:10,16 50:7 50:16,20 51:16,18,21 58:14 60:12,14 69:12 126:13 157:7 160:4 198:19 243:8 244:2,3 244:4,5,8,9,10 victory 263:20 VIDEGRAPHER 145:4 video 6:10,11 Videographer 3:16 6:2,21 33:19 75:2 97:6,13 130:10,16 168:22 205:15 206:1 206:8 222:16 277:2	Videotape 6:3 277:3 Videotaped 1:15 2:1 view 71:15 162:22 199:16 violated 174:7 violation 174:12,16 visited 21:4 voice 6:15 volatile 256:11 volume 1:15 97:7,14 117:17 206:2,9 277:3 volunteer 210:17,18 volunteering 231:5,7 vote 167:14 voted 53:8 146:11,11 <hr/> W <hr/> wait 27:10,10,10 waive 237:15 waived 277:7 waiver 91:11 walk 9:15 76:22 131:2 263:7 270:17 walked 193:16 walking 69:4,21 70:16 70:18 219:17 270:19 want 26:2 31:21 35:9 35:22 62:6 70:14,15 75:9 107:2 112:13 129:22 130:1,2,6 135:19 153:2 159:16 160:20 161:14 189:18 208:5 216:8 222:13 223:1,9,18 224:10 225:2 226:16 227:19 243:10 251:10,12,20 259:18 262:5,7 265:5 266:3 269:20 wanted 11:8,10 29:13 33:1,4 34:12,13,21 36:12,22 43:5 120:13 219:10 227:10 245:10 255:10 256:7 256:8 262:12,13	275:17 warehouses 105:17 war-cry 263:17,18 Washington 21:9 209:21 210:2 235:17 wasn't 31:4 40:4 42:4 57:1 58:20 82:12 138:11 139:5 140:21 152:16 201:15 212:10 220:10 232:17 233:16,18 234:12 251:11 262:13 273:19 watchful 271:6 water 205:20 way 9:15 42:7 50:14 54:10 66:3 69:2 117:10,11 121:17 123:3 125:6 138:22 139:6 158:21 174:8 175:12 191:12 202:5 221:9 228:10 245:6 Wayne 16:12 weary 271:6 Wednesday 74:22 75:4 76:13,14 253:19 254:6 Wednesday-night 253:22 254:3 week 223:17 weekly 81:9,10,14,16 82:8 83:2 88:8 weeks 76:15 82:19 well-being 206:19 went 9:14,16 10:11,14 10:22 11:11 12:3,15 13:11 14:4,15 16:18 18:6 29:12 31:4 39:20 40:1 43:19 50:13 51:10 66:2 127:2 200:13 203:8 223:14 235:6 254:19 264:8 275:10 weren't 138:9 Wesley 43:20 44:6,13
---	--	---	---

132:16 140:8,9 141:4 142:2,18 143:2 147:16 148:14 149:9 150:3,19,21 152:10 152:11 153:14 155:11 156:14 157:8 184:2,4 192:18 193:2 203:13,17 222:4 237:21 we'll 9:9,15 130:4 153:2 194:17 224:5 225:2,5,14 226:5 276:16 we're 26:3 28:11 34:3 57:18 58:1 69:5 75:15 78:6 83:14 94:8 144:22 152:7 163:9 179:17,18,18 205:15,17 223:4,6,11 223:15,16 224:6,8 225:20,21 270:8 275:3 we've 118:6 193:16 224:15 whatsoever 106:6 118:9 119:8 125:11 126:5 200:8 WHEREOF 279:12 wife 35:9,10,22 122:2 124:1,6,13,14,17,22 125:4 209:3 217:12 217:17 227:18 228:15,16 252:5,6 wife's 70:10 William 4:3 43:22 44:6,12 132:11,15,22 133:9 136:20 137:14 139:14 143:1 148:12 151:5,6 152:9 153:14 155:11 156:13 164:8 164:22 165:3 167:3 184:1 203:16 237:21 256:4 Williams 3:22 39:11 43:1 44:2,7,13 47:19	52:14 55:6 79:13,20 80:6,7 89:15,16,19 91:3 92:9,15 93:3,5 93:15 95:4,9 96:10 96:11,15 97:22 98:9 98:17 99:2 103:9,13 109:2 116:21 132:13 142:2,17 143:1 147:17 148:13 149:9 150:3 152:10 153:14 155:11 156:15 157:9 199:8 202:20 203:17 204:9 222:4 237:18 246:13 248:1 255:6 258:11 willing 223:21 224:12 225:20 Wills 215:15,18 winter 56:8,9 wishes 203:2 witness 5:2 7:2 17:6,8 17:10 34:2 46:8 54:21 55:16 65:17 105:7 133:18 135:2 139:19 158:12 160:17,21 161:3,6 190:9 191:17 192:19 196:18 199:4 223:1,7 223:8,10 225:3 243:14 279:12 witnessed 192:19 wonder 36:20 62:19 wondering 222:9 Woodson 13:6 15:12 15:13,14 word 123:2,7 215:15 219:2 266:1 wording 215:21 words 23:20 24:16 107:10 113:11,12 217:16,21 273:22 work 9:10 11:16,18 12:10,19,22 13:12,13 15:3 17:12,14 19:2 24:17 104:8 114:6	120:14,16 121:1 130:20 224:5 225:20 226:5,13,20 230:15 230:18,19 273:5 worked 13:1 14:12 17:16 18:11,14,20 19:8,10 140:11 170:16 193:7 256:13 working 20:6 39:6 82:14,15 90:19 92:21 94:8 105:1,18 109:19 231:3,5 234:19 248:3 works 98:20 105:1,10 105:16 208:7 worship 70:5,5 122:22 211:16 212:3,10 wouldn't 270:13 wrist 250:21 251:7 write 75:11 175:7 177:10 178:5 written 53:20,22 54:2 54:6,9 61:7 102:21 103:2,5 140:22 174:3 174:7 249:19 272:12 wrong 65:5 219:2	205:12 206:15,21 207:11 213:11 231:4 233:6 236:14,15 242:11,12 years 15:3,5 91:6 211:8,20 215:8 227:7 227:8 255:18 Yolanda 252:7 253:2 young 233:4 275:5,10 275:11,12,18
<hr/> Z <hr/>			
zero 173:13			
<hr/> \$ <hr/>			
\$10,000 221:2 \$30,000 81:2			
<hr/> 0 <hr/>			
0 186:12 01-09 159:7 164:16 182:5 184:3 187:22 188:16,21 192:3,10 200:13 04-09 199:6,20 200:3 200:10,14 08 190:11 09 29:5,8 162:20 190:11			
<hr/> 1 <hr/>			
1 1:15,21 5:9 6:3 28:1 28:4 97:7,7,14 131:5 206:9 237:5 243:22 277:3 1st 83:19 219:13 1-09 132:12 138:15 153:7,15 154:13,21 204:4 243:20 1-199092 1:20 1-9 152:3,5,7 1:30 130:5 223:15 10 1:18 106:4 142:13 180:13 183:1 266:16 266:19 10th 3:5 6:9 128:14			
<hr/> X <hr/>			
x 1:2,14			
<hr/> Y <hr/>			
yeah 10:8 25:17 40:6 68:1 116:11 130:7 137:11 152:3 158:22 171:10 212:21 241:10,20 245:9,21 248:20 255:18 262:13 264:7,20,20 272:4 year 16:2 23:8,14 25:22,22 27:4 83:10 83:14,14 84:20 89:2 114:1 117:4,18 118:10 119:14 142:5 161:2 170:9 171:14 171:15,19 190:11 204:15,16,18 205:5			

<p>10,000 221:3 10-30-2013 279:16 10-33647 1:9 10:00 223:13 264:9,12 264:14 265:1 10:08 1:19 6:10 1033647 6:8 109 132:17 11 25:22 28:13 147:8 159:17 180:13 183:2 266:21 11-1-52 9:7 11:00 69:8,11 72:4,17 72:19,20 73:4 75:19 113:9,13,18,22 114:2 114:3,9,13,21 115:6 115:10,14 116:8,17 117:14 261:7,15 262:18,19 264:10 11:45 97:10,12 11785 3:4 12 118:6 148:1 168:19 170:1 174:19 180:13 183:2 185:11 267:1 12th 14:7 56:17 113:4 118:11 128:14 12-month 118:12 12:10 97:12,16 12:47 130:11,13 223:14 13 133:7 13th 136:21 130 5:10 14 149:1 180:13 183:2 267:3 15 152:8,15 238:9,16 238:21 240:17 245:16 268:10 15th 30:2 39:16 50:14 51:3,11 52:10,22 140:19 149:20 150:21 165:14,18 182:4,12 183:5 187:15 191:9 192:22 202:9 219:13 237:8,9</p>	<p>239:1 248:18 16 275:17 1600 37:3 17 155:6,6 158:3,3,11 158:20 180:13 183:2 267:7 18 58:2 59:3,20 60:1 60:10,16 76:1 156:5 180:13 183:2 202:10 267:11,14 19 17:4 157:3 180:14 183:2 1970 9:21 1975 20:21 1983 12:2 1984 16:4 1986 12:5 1998 133:7 136:21 137:15 138:7,10</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 5:10 97:14 130:14 131:1,7 135:8 143:14 143:19 155:17 180:2 188:1 194:6 195:6,9 196:5,8,8,22 200:15 206:2 243:12,17 266:4 2's 196:1 2:00 223:14 264:15 2:13 130:13,17,19 2:30 264:9,10 265:1 20 106:4 200 170:8 2000 139:14 140:5 2001 210:11 213:19 2002 142:5,21 143:20 147:14 148:3,16,21 2006 149:4 267:3 2007 155:22 2008 156:6 157:1,4 168:18 170:8,9 267:11 2009 23:21 24:3 30:2 37:8 38:21 39:17,21</p>	<p>43:1 44:19 45:3,8 47:2 49:14,20 50:5 50:14,15 51:4,11 52:10,11,22 57:20 60:4,11 76:1 82:21 84:21 86:14 92:8 94:21 100:6 121:11 126:5,9 138:14 140:19 149:20 150:21 152:8,15 153:6 157:19 159:5 161:3 165:15,18 167:4,15 170:9 171:19 182:4,12,17 183:5 187:15 192:22 197:5 198:10 201:1,5 220:14,21 221:2 231:4 237:9 238:9,17 238:21 239:1 240:17 245:16 248:19 268:10 2010 19:18 23:9,19,21 25:3,15,16,19 56:8,9 56:17 57:2,16 58:21 83:17,20 84:20 88:10 89:2 90:18 110:15 113:4 119:8 128:14 144:11 157:14 160:2 160:8,12 161:1,7 186:12,18 202:9,19 203:15 248:8 2010/2011 83:11 2011 1:18 6:9 118:12 242:12 278:12 279:14 20705 3:6 20735 7:13 20770 2:6 3:13 21 203:15 21st 160:2,8,12 202:19 227 5:5 228 5:11 240-553-1206 3:14 25 106:20 107:4 26 178:16 199:5 269:4</p>	<p>269:9 26th 142:5 27 139:14 140:5 27th 52:11 198:10 28 5:8 201:10 281 1:21 29 142:21 202:18 29th 143:20 148:2,16 148:21</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 131:12 132:10 183:22 200:15 206:9 277:3 3:35 206:4,6 3:47 206:7,11 30 8:15 106:5,13,21 107:4 137:8,8 205:18 227:7 30th 19:18 83:19 301-572-7900 3:7 31 203:12 31st 155:22 35 159:12 227:7 269:9 36 131:8 137:9 151:19 179:22 193:15 243:10 269:6</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 87:12 148:4 4:00 222:19 4:05 223:5 4:06 224:14 4:30 224:1,3,5,14 40 131:5 400 2:5 3:12 4400 21:12</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 170:2 190:14 234:6 5:12 277:5,9 501(C) 88:1 501(C)(3) 85:15 87:11 509 63:17 5913 7:12</p>
---	--	---	---

6			
6 167:12,13 168:19 178:16 269:9 6th 157:1 6-point 188:9 6:00 223:22 6404 2:4 3:11 6:13			
7			
7 5:4 133:4,5,16 135:8 180:2,13 183:1 266:5 266:18 267:14 75 21:1			
8			
8 139:9,9 168:13 180:13 183:1 266:9,9 8th 157:14 8:00 69:7 72:3,16,18 72:19,21 73:2,3 75:19 117:3,8,20 122:13,14 83 16:7 84 16:5 211:13			
9			
9 141:15 180:13 183:1 266:12,12 9:00 226:12 276:19,22 90 19:3 93 19:3,8 95 19:8,18 211:13 990 85:12 254:22 255:3 990-T 85:7,16 108:7 990-Ts 107:19			