

1 A I did -- I didn't determine that.

2 Q Was there a time when she was hospitalized
3 and not running the church?

4 A She was hospitalized and still running the
5 church.

6 Q Okay. And maybe I'm sure throughout her life
7 she's been hospitalized. But that wasn't my question.
8 Was there a time when she was hospitalized and not
9 performing her role as the person running the church?

10 A I wouldn't say so. No.

11 Q So prior to her death was there any point
12 where she was no longer running the church?

13 A She ran the church until the day she took her
14 last breath.

15 Q So she was -- from -- were you near her in
16 her last months of life?

17 A Yes.

18 Q Was there a point where she was not -- where
19 she was under sedation?

20 A Not that I'm -- not that I was -- when I was
21 there, no.

1 Q Well, was there a point in her time of
2 illness where her son did not know where she was?

3 MR. ASHTON: Objection. Calls for
4 speculation.

5 THE WITNESS: There was a point when he said
6 he didn't know.

7 BY MR. ABDULLAH:

8 Q Right. Okay. You've been -- I'm going to
9 show you 18. Have you seen this document today?

10 A Yes.

11 Q And you earlier testified that the signature
12 on it was your signature, you signed the Apostle Betty
13 Peebles' signature; is that what your --

14 A Uh-huh.

15 Q Okay. And what was the date of this
16 signature?

17 A October 7, 2010.

18 Q And why didn't the apostle sign her own
19 signature?

20 A I don't remember. What was happening that
21 day. I am not sure.

1 Q So at the time that you signed this did the
2 apostle's signature look like that when she signed her
3 own name?

4 A I would say not.

5 Q It was not. So by signing this, if she
6 signed her own name it would not look like this?

7 A Right. But she gave me authorization to put
8 her name on this document.

9 Q Okay. And where is that authorization?

10 A She gave it to me verbally.

11 Q So it's verbal?

12 A Yes. And it is the truth.

13 Q What is the truth?

14 A That she gave me authorization to put her
15 name on the document. It was for the senior citizen
16 project.

17 Q And -- but in doing that she no longer was
18 able to utilize this account with her signature, right?

19 MR. ASHTON: Objection. Calls for a legal
20 conclusion.

21 BY MR. ABDULLAH:

1 Q Her signature does not appear on this
2 document, correct?

3 MR. ASHTON: Objection. Calls for a legal
4 conclusion.

5 THE WITNESS: Her signature does appear on
6 that document.

7 BY MR. ABDULLAH:

8 Q No. That's your signing her name, correct?

9 MR. ASHTON: Objection. Counsel is arguing
10 with the witness.

11 BY MR. ABDULLAH:

12 Q I'm just seeking clarification. You said
13 that at the time that you signed this her signature did
14 not look like this, correct?

15 A I said she gave me authorization to put her
16 signature on that document.

17 Q Right. And at the time you signed this
18 document, that was not her signature at the time,
19 correct?

20 MR. ASHTON: Objection to form.

21 THE WITNESS: Because she didn't sign

1 anything that day, it could have been. I don't know.
2 She gave me authorization to put her name on that
3 document.

4 BY MR. ABDULLAH:

5 Q So you're saying that her signature did look
6 like this?

7 A I'm saying I don't know that day what her
8 signature looked like.

9 Q It changed daily?

10 A I don't know. Sometimes. We had some other
11 documents with signatures.

12 Q Okay. Now, you've seen this document before,
13 18A? That's the -- that was what the apostle's
14 signature looked like on March the 16th, 2010, correct?

15 A Uh-huh.

16 Q And you agree that the signature that you
17 signed on October the 7th of the same year doesn't look
18 like that?

19 A I agree.

20 Q Okay. So that now the -- okay. I don't
21 think we need to go any further with that one.

1 So based on this, the only persons who -- the
2 only persons who signed this deposit documentation
3 signature card were you, correct?

4 MR. ASHTON: Objection to form.

5 BY MR. ABDULLAH:

6 Q Am I correct?

7 A No.

8 Q Okay. Who else signed it besides you?

9 A Pastor Betty Peebles gave me permission to
10 put her signature on that document to be executed for
11 something that had to do with the senior citizen
12 project.

13 Q And you signed her name, correct?

14 A I put her name n the signature -- n the
15 document.

16 Q You put her name. So that was a electronic
17 signature?

18 A Yes.

19 Q Electronic signature?

20 A Yes.

21 Q Okay. And then you signed your name?

1 A Yes.

2 Q So other than this electronic signature, you
3 were the only other -- you were the only person who
4 actually signed the document, correct?

5 A She gave me permission to put her signature
6 on that document.

7 Q And this authorized you to withdraw funds
8 from this account?

9 A I'd have to see which account it was.

10 Q Well, is this a signature card? You're
11 familiar with bank signature cards?

12 A Yes.

13 Q And you sign them so that you're authorized
14 to remove funds from the account --

15 MR. ASHTON: Objection.

16 MR. ABDULLAH: -- write checks?

17 MR. ASHTON: Objection. Counsel is now
18 testifying. That's a question.

19 MR. ABDULLAH: Not to you, but to her.

20 THE WITNESS: I would have to know which
21 account that was for and then I could answer that

1 question.

2 BY MR. ABDULLAH:

3 Q Well, I'm asking you, what was the purpose of
4 -- what was the purpose of -- do you remember signing
5 this?

6 A I remember the document.

7 Q Why did you -- what was the purpose of this
8 card?

9 A I'd have to just go back and look at it to
10 see what it was for. There were senior citizen
11 transactions. I know the purpose of it. I don't know
12 what the account is.

13 Q You know the purpose of it? What's the
14 purpose of this card?

15 A It's to make sure that there was money
16 flowing that had to do with the senior citizen project.

17 Q Does this -- by signing this were you
18 authorized to write checks on this account?

19 A I don't even know that it is a checking
20 account.

21 Q Okay. Let's see here. So -- but this is

1 exhibit 18E, correct?

2 A Yes, sir.

3 Q And what I have here is a deposit account
4 documentation signature card.

5 A Uh-huh.

6 Q Okay. And this says Designated account
7 signers, right? And you're one of them?

8 A Yes.

9 Q So you're allowed to sign on this account?

10 A Yes.

11 Q And did you ever remove funds for this
12 account by signing a transfer document on this account?

13 A I'd have to know which account it is. I
14 don't know.

15 Q So you don't know if you --

16 A I'm just -- I'm not sure.

17 Q All right. Now, looking at this, does this
18 help refresh your recollection whether you removed
19 funds from that account?

20 A I --

21 Q Take your time.