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KRENELKA ORIGINAL JK

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KING COUNTY, WASHINGTON

APR 1 1988

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SEATTLE, WASHINGTON, WEDNESDAY, APRIL 6, 1988

3:00 A.M.

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LOREN KRENELKA, Witness herein, having been first duly sworn on oath, was examined and testified:

(Exhibits 106 through 116 were marked for identification.)

E X A M I N A T I O N

BY MR. PIERCE:

Q. State your full name?

A. Loren Krenelka.

Q. Residential address?

A. 831 South 176th, Seattle 98148.

Q. Are you employed at the present time?

A. Yes.

Q. Where is that?

A. Community Chapel and Bible Training Center.

Q. In what capacity are you employed?

A. Director of service ministries.

Q. How long have you held that position?

A. Under the name director of service ministries,

1 I have held it for approximately eight months. Previous
2 to that time, I was the assistant operations manager.

3 Q. Operations was changed into service ministries?

4 A. That is correct.

5 Q. What does operations or service ministries
6 cover?

7 A. It covers all aspects of plant operation,
8 meaning maintenance, facilities use, janitorial,
9 security, taping, sound ministries, which includes tape
10 library and electronic services.

11 Q. What was the last part?

12 A. Tape library and electronic services.

13 Q. How long have you acted as the assistant
14 operations manager?

15 A. 10 years.

16 Q. Who was your supervisor or the director of
17 operations the most current of that period, that 10-year
18 period?

19 A. Wayne Snoey.

20 Q. How long was he your supervisor?

21 A. The entire time.

22 Q. Did Wayne Snoey leave the Community Chapel?

23 A. Yes.

24 Q. When he left, did you take over the position of
25 director?

1 A. Yes.

2 Q. Do you know where Wayne Snoey is at the present
3 time?

4 A. I believe he still resides in Seattle.

5 Q. Do you know where?

6 A. No.

7 Q. Have you ever been to his residence?

8 A. Where he resides now?

9 Q. Yes.

10 A. No.

11 Q. Have you ever been to a previous residence?

12 A. Yes.

13 Q. Where was that?

14 A. Normandy Park.

15 MR. LEACH: Off the record.

16 (A discussion was had off
17 the record.)

18 Q. (By Mr. Pierce) Loren, you received a subpoena
19 duces tecum to bring documents down to this deposition?

20 A. Yes.

21 Q. You provided an number of documents which we
22 have had marked as Exhibits Nos. 106 to 116.

23 Do those encompass all of the
24 documents which would be in response to the subpoena
25 duces tecum?

1 A. I believe all of the ones I would have control
2 over, yes.

3 Q. Do you have any function in the accounting or
4 treasurer's office?

5 A. No.

6 Q. What activities does the security department
7 take with regards to funds involving the church?

8 A. That is an inclusive question.

9 Q. You tell me.

10 A. Basically safeguarding all funds and properties
11 of the church in any manner necessary.

12 Q. Give me an example of the activities that
13 securities would take during a week, during the last
14 week, from one Sunday to the next Sunday?

15 A. In regards specifically to safeguarding
16 finances?

17 Q. That is correct?

18 A. Okay. I would assign officers to be present at
19 all meetings. And they are to observe the taking of the
20 offering and see that the offering is safely into a safe
21 office of the accounting professions' choosing with at
22 least two people in attendance. And during the week, as
23 necessary, any funds that are transported to the bank are
24 transported by a security officer courier type position
25 in that situation.

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Q. Anything else?

A. Just normal patrole, both on foot and in a vehicle, of the campuses, and monitoring in response to any alarms that go off.

Q. You say you assign officers to be present at all meetings. Are you talking about church services?

A. Yes.

Q. Not every single meeting?

A. No. Services where an offering would be taken.

Q. And last Sunday, for example, were there services in which offerings were taken?

A. Yes.

Q. Where were those services held, and what officers were assigned?

A. Services were held at both the east campus and the west campus, what we refer to as the sanctuary and the chapel.

Q. The sanctuary is on the west campus?

A. Yes. And as is our routine, we have officers assigned a week in advance for all of those services. It is rotating shifts. So right now I don't have the information in front of me of exactly what officer would be where. I know we have an officer at each campus during the time the service is in progress.

Q. Is the officer involved in overseeing the funds

1 that are collected and transported to the accounting
2 office?

3 A. No. His responsibility is limited to simply
4 being there, watching the offering being taken, and then
5 safeguarding the offering and the accounting person and
6 the ushers that walk the offering into the office. And
7 he stands by outside of the office while they, the two
8 individuals inside, put the money in the safe.

9 Q. He has, the security person has, no activity
10 with regards to touching or counting the money?

11 A. No, none whatsoever.

12 Q. It is merely as a guard to protect the money
13 against third parties?

14 A. That is correct.

15 Q. You said what is at all services. Can you
16 define what you mean by services?

17 A. Church meetings. Normal church service. We
18 use the term meeting or service interchangeably. Any
19 time we have a large group of people in one of our main
20 auditoriums and we plan to take an offering, we consider
21 that to be a service.

22 Q. When are normal church services?

23 A. At this time and as long as I have been here,
24 7:45 on Friday, 10:00 A.M. Sunday morning, and 7:00 P.M.
25 Sunday night.

1 Q. These times are the current times that services
2 are held at both the east campus and the west campus?

3 A. That is correct.

4 Q. Are the services attended by one or more
5 security people from your office at each one of these
6 services?

7 A. Yes.

8 Q. Up until March 1, 1988, were all of the
9 services during the year 1988 held at the sanctuary on
10 the west campus?

11 A. Yes.

12 Q. And during the year 1987, were they all at the
13 sanctuary?

14 A. Yes.

15 Q. When was the sanctuary first used exclusively
16 for the east campus?

17 A. I think that would have been in '79. I
18 believe.

19 Q. From 1980 on up until March 1, all worship
20 services were held in the sanctuary on the west campus?

21 A. Yes.

22 Q. When was the chapel on the east campus used in
23 March 1988, for the first time in a number of years, for
24 worship services?

25 A. I believe it would be March 6th, Sunday

1 evening. I believe that was the first time.

2 Q. And who was conducting those services on
3 March 6, 1988?

4 A. Do you mean who had the order of the service as
5 a minister?

6 Q. Was it the senior elders, the eldership that
7 was holding those services?

8 A. Correct.

9 Q. It was not Pastor Barnett?

10 A. No, it was not.

11 Q. Do you know how many people attended those
12 services on March 6, 1988?

13 A. There were, to the best of my ability to
14 determine, 395 people at -- wait a minute. I was wrong
15 about my date. March 6th. I don't have any figures for
16 March 6th.

17 Q. Would it be the first date that the church
18 services were held on east campus, Friday, March 11, in
19 the evening service?

20 A. Yes, that is correct.

21 MR. PIERCE: Off the record.

22 (A discussion was had off
23 the record.)

24 Q. (By Mr. Pierce) Was there a service on March
25 6th at the chapel on the east campus?

1 A. No.

2 Q. So, would the first service used for the east
3 campus chapel be on March 11?

4 A. That is correct.

5 Q. That would be the date that the senior elders
6 decided they wanted to have a worship service at those
7 facilities on the campus?

8 A. Correct.

9 Q. When that occurred, did that require that part
10 of the security personnel from the west campus go to the
11 east campus?

12 A. Yes.

13 Q. And you were the one responsible for delegating
14 those individuals to go there?

15 A. That is correct.

16 Q. Were you requested to provide security at that
17 east campus?

18 A. Yes, I was. A --

19 Q. Who requested it?

20 A. It was requested by Scott Miller.

21 Q. Scott Miller requested that you go to the east
22 campus to provide security?

23 A. I'm sorry. West campus to provide security.

24 Q. I want to know on the east campus, where the
25 chapel is, where the senior elders were holding their

1 services on March 11, who requested that security go to
2 those services?

3 A. No one did.

4 Q. The services up until March 11th had all been
5 held at the sanctuary?

6 A. Correct.

7 Q. On March 11th Donald Barnett was holding
8 services in the sanctuary?

9 A. That is correct.

10 Q. Are you familiar with the bylaws of Community
11 Chapel?

12 A. Somewhat.

13 Q. Are you provided with the portion that directs
14 that all services are under the direction of the chapel?

15 A. Yes.

16 Q. You knew that on March 11th there was an order
17 entered by the court no one was to interfere with Donald
18 Barnett as the pastor of Community Chapel?

19 A. Yes.

20 Q. At least, on March 11th you knew the pastor was
21 holding the services for the Community Chapel in the
22 sanctuary; is that correct?

23 A. I knew that's what he intended to do, yes.

24 Q. Did anybody request that you provide security
25 to the east campus?

1 A. No. I wouldn't normally need anyone to request
2 that.

3 Q. Did you make that determination on your own?

4 A. Yes. Obviously, knowing there would be
5 potential for a large number of people to be there, I
6 would be remiss in my duties if I didn't also provide an
7 officer to be sure there was coverage in case an offering
8 was taken or in case of any type of civil disorder that
9 were to take place. So I did what I had promised Donald
10 Barnett I would do over the phone that evening, which was
11 I would protect all of the buildings, grounds, people,
12 finances, et cetera, as I always had, and I would do so
13 per normal procedure.

14 Q. It wasn't normal, because there had never been
15 a service in at least seven years at the east campus; is
16 that right?

17 A. Right. But I knew what normal procedure would
18 be regardless of any service that take places or any
19 meeting that takes place in either campus.

20 Q. Was an offering taken on Friday March 11, '88?

21 A. Yes.

22 Q. Did you have a security person in attendance?

23 A. Yes.

24 Q. Were offerings taken at the east campus on
25 Sunday, A.M. and Sunday P.M. services?

1 A. Yes. I believe.

2 Q. Excuse me. The March 13th services?

3 A. To the best of my recollection, they were.

4 Q. How did you find that information out?

5 A. Well, I was at attendance at both campuses off
6 and on, for all of the services that have taken place, to
7 verify that we did have coverage and to just see that
8 things were in order and that people were where they
9 should be and that type of thing.

10 Q. Is it sort of the situation where you never
11 have a chance to rest, being in charge of the operations?

12 A. You might say that. I have approximately 40
13 people that work for me, plus volunteers.

14 Q. You have to supervise those, and that could be
15 at all hours of the day that they could be working?

16 A. Yes.

17 Q. Were you traveling back and forth between these
18 campuses?

19 A. Yes.

20 Q. Did you take attendance at both campuses on
21 March 11 and March 13?

22 A. Yes.

23 Q. I want to know, was somebody else taking
24 attendance at any of these other campuses besides
25 yourself?

1 A. Well, I did not personally make these counts
2 myself.

3 Q. Okay.

4 A. In every case here, I would have asked either a
5 security officer or an usher. Or I would have directed a
6 security officer to ask an usher on my behalf to make
7 these counts. They would then in turn give me the
8 figures later in the evening.

9 Q. They communicate it to you orally?

10 A. Orally or a scrap of paper. Or in many cases,
11 the officer will jot it down in his personal notebook or
12 in our duty log, and I would take the figures from there.

13 Q. Duty log?

14 A. Un-huh.

15 Q. And that duty log, does it have notations of
16 the people that were in attendance?

17 A. Yes.

18 Q. Did you bring those duty logs with you?

19 A. No. I brought a compilation.

20 Q. A summary sheet based on other information; is
21 that correct?

22 A. These are the figures that are on the duty
23 sheets.

24 Q. Where are the duty sheets?

25 A. I didn't bring those.

1 Q. Are they back at the offices?

2 A. Yes.

3 Q. Something under your possession and control?

4 A. Yes.

5 Q. When was this exhibit prepared, No. 106?

6 A. I had it, basically, prepared last week. And
7 then I waited until after this weekend to add the last
8 figures.

9 Q. Is this a computer printout?

10 A. Yes.

11 Q. It is a computer in your office?

12 A. Yes.

13 Q. Is all of this information on a hard disk or a
14 floppy disk?

15 A. Well, it is a central computer. I have no
16 access to that, the computer itself.

17 Q. Who has access to that?

18 A. Computer services department.

19 Q. Is that something under your direction?

20 A. No.

21 Q. It is a different operation?

22 A. A different department.

23 Q. Under what department is computer services?

24 A. It's a church department. It reports or did
25 report to the general manager directly.

1 Q. Which of these figures that you have are based
2 upon information that is provided to you, which are out
3 of the duty logs, and which are on your own notes?

4 A. I don't think I have that information.

5 Q. Am I supposed to know what the original source
6 of this information is that you have on Exhibit 106?

7 A. I would say --

8 Q. Do you know?

9 A. Yes. I would go back to my duty logs, officers
10 duty logs. I am sure in most every case the figures
11 would be on there.

12 Q. As you sit here now, you do not know that
13 information; is that correct?

14 A. Yes. I know they would be on the duty logs.

15 Q. Earlier I thought you said this was based on
16 information provided on slips of papers and the duty
17 logs. Now are you sure it is all from the duty logs,
18 these figures?

19 A. I couldn't be sure that what is in the duty log
20 is exactly the same as these figures. I would say in
21 most every case the figures are accurate as they stand
22 here.

23 Q. If it is not from the duty log, where would it
24 be from?

25 A. I am not sure what you are getting at.

1 Q. I'm not explaining what I am getting at. I am
2 asking you.

3 If it is not in the duty log, where
4 would the information come from?

5 A. It would come directly from me. I have my
6 pocket calendar. In many cases besides being in the duty
7 log, the usher or duty officer gave it to me directly and
8 I jotted it on my calendar and I compared this and
9 entered the figures here.

10 Q. Do you have figures for each day?

11 A. Yes. Would you like photocopies.

12 Q. Yes.

13 A. I hate to give up my calendar.

14 Q. Sure. I will make copies of it and give it
15 back to you.

16 A. Okay. Starting right here. The 11th, I have
17 the figures jotted down here. Here and here.

18 Q. Do you keep notes in there of activity that
19 occurs at --

20 A. Not normally. Because this was unusual, and I
21 was taking these counts. I jotted them down here, where
22 I could keep track of them.

23 Q. I will give them to her and have her make a
24 copy of it.

25 A. Sure. Starting right here.

(A short break was taken.)

1
2 Q. (By Mr. Pierce) She is making copies of those.

3 A. Okay.

4 Q. We can have those. You signed an affidavit in
5 these proceedings saying that the attendance was taken
6 under your direction; is that correct?

7 A. Yes.

8 Q. Why did you start taking attendance on
9 March 11?

10 A. I was asked to.

11 Q. By whom?

12 A. Scott Hartley.

13 Q. For each of these additional days, too?

14 A. A matter of interest for myself.

15 Q. A personal thing that you wanted to do?

16 A. I always keep a record of all attendances at
17 Community Chapel, and have for years. And periodically I
18 do this on a routine basis so that we may forecast growth
19 trends.

20 Q. Where are these records kept? In your office?

21 A. I keep them in my office.

22 Q. They would show us a decrease or increase, at
23 least some activity, that has occurred from 1978 to 1988;
24 is that correct?

25 A. Yes.

1 Q. And possibly that would show a seasonal change.
2 If somebody decides Easter time they don't want to come
3 to church, it will reflect that there is a decrease?

4 A. These are not that inclusive. Usually it is
5 one time a year, unless there is reason. Each year in, I
6 believe, October.

7 Q. This is not a usual type of thing to do, to
8 take attendance?

9 A. Not generally. Although from my standpoint as
10 director, I would often take attendance at all types of
11 meetings that take place on both campuses for any reason
12 because, as facilities coordinator, I need to know how
13 many janitors to supply, what kind of supplies are going
14 to be needed, whether or not we have adequate facilities,
15 whether or not the heating and ventilation is adequate.
16 As part of my routine duties, something unusual like this
17 split of services would require me to know what was going
18 on so I would be able to furnish and supply.

19 Q. The figures you have on Exhibit 106, which were
20 in your affidavit, you had no personal knowledge of;
21 somebody else took counts of those people in attendance
22 on those dates. Is that correct?

23 A. Yes. Although I was in attendance at most of
24 these meetings and either did a rough count myself, just
25 to make sure we were in the right ball park, or just

1 knowing the seating capacities as well as I do, I would
2 be able to tell these counts were fairly accurate.

3 Q. You can't say they are accurate, though?

4 A. Pardon me?

5 Q. You can't say they are accurate?

6 A. They are accurate. They are as accurate as a
7 count can get when you have people moving and you take
8 counts at difference hours of the service, et cetera. It
9 is not an exact science. There is no way to be
10 absolutely certain that this is the exact number of
11 people in the building at this moment. Obviously, there
12 is a margin of error. Probably 10 percent one way or the
13 other.

14 Q. No turnstiles used or some way of physically
15 counting people going in and out?

16 A. No.

17 Q. You have told the individuals under your
18 direction how to take the counts?

19 A. Yes.

20 Q. And what did you tell them?

21 A. I tell them to be discrete, not to use their
22 finger and point, and I give basic recommendation on how
23 to get an accurate count.

24 Q. How is that?

25 A. I have however many people are needed, number

1 of ushers, two, four, six, whatever, to begin counting at
2 a certain place, all at the same time, and have them
3 count specific areas. And then turn those totals in to
4 the lead usher who totals all of those areas up and
5 submits the number to me.

6 Q. How many people would be involved in this count
7 procedure?

8 A. It would be different every time. It would
9 depend on who was available.

10 Q. How many ushers there were?

11 A. How many. And who they were.

12 Q. What time of the services are the counts taken?

13 A. I usually try to wait until the sermon or the
14 message, at which time the greatest number of people are
15 sitting down. That way, it's easiest to count and we
16 have the least distraction.

17 Q. Do you know what time these counts were taken
18 at each campus?

19 A. They were generally taken during the time that
20 the sermon was being preached at either campus. And I
21 could not -- I couldn't tell you when that was exactly.

22 Q. I'm not talking about the actual hour of the
23 time?

24 A. What are you asking?

25 Q. I am asking what part of the services. How do

1 you know they were taken at the time of the sermon?

2 A. They were taken at a time when the bulk of the
3 people are sitting down, for whatever purpose.

4 Q. What I am asking is, how do you know that?

5 A. Because that would be my instructions to the
6 people counting.

7 Q. I understand that. How do you know those
8 instructions were followed?

9 A. I can only assume the people who work for me
10 follow my instructions.

11 Q. Do you think that it is reasonable for Donald
12 Barnett to presume you will follow his directions because
13 you are working for the president.

14 MR. LEACH: Is that an argument?

15 MR. PIERCE: No.

16 MR. LEACH: Sounded like an argument, this
17 question.

18 A. Could you clarify it?

19 Q. (By Mr. Pierce) Want me to restate it because
20 you don't understand it?

21 A. Yes. I don't understand it.

22 Q. Would you think it is reasonable for you to be
23 following the directions of the president because you are
24 under the employment of the president?

25 A. If I recognized him as the president, yes.

1 Q. And do you recognize him as the president?

2 A. At this time I recognize him as the court-
3 appointed president of the corporation.

4 Q. Do you follow his directions under that court
5 appointment?

6 A. Yes, in the agreement that we have.

7 Q. In the agreement that who has?

8 A. Pastor Barnett and myself.

9 Q. The two of you have an agreement?

10 A. Yes.

11 Q. The date of that agreement is when?

12 A. Friday, March 11th.

13 Q. And that agreement is, I take it, oral?

14 A. Oral.

15 Q. Nothing down in writing?

16 A. No.

17 Q. That agreement covers what areas?

18 A. All of the areas of my employment, which we
19 have discussed.

20 Q. How long was the discussion with regards to
21 this agreement?

22 A. It was a telephone conversation where he said,
23 "If I ask you to do something, will you tell me whether
24 or not you will do it?" I said, "Yes, if you ask me to
25 do something that I feel I cannot do, then I will inform

1 you. Otherwise, I will operate per normal procedure."

2 Q. Sounds like you are going to do what you are
3 supposed to be doing under his directions?

4 A. Absolutely.

5 Q. What is the agreement part. You are going to
6 be doing what you are supposed to be doing.

7 A. Right. He had asked me to do something that
8 night in regards to the Friday night meeting I did not
9 feel I could do.

10 Q. What was that?

11 A. He asked me to physically restrain people from
12 entering the building at east campus and if necessary to
13 get County Police to physically restrain people from
14 entering the building.

15 Q. And you didn't think that was proper?

16 A. I told him --

17 Q. I didn't ask what you told him. I just asked
18 if you thought it was proper.

19 A. No, I did not.

20 Q. Have you followed his directions as the
21 president?

22 A. To the best of my knowledge.

23 Q. There are some telephone services of some type
24 that goes between the Community Chapel and the parsonage?

25 A. Yes.

1 Q. Can you explain what that telephone service is
2 or services are?

3 A. There were two telephone lines that were part
4 of the corporate phone system that were extensions to the
5 parsonage.

6 Q. Those were taken out when?

7 A. I am not sure if I know the exact date.

8 Q. Approximately.

9 A. Roughly the second week of March, I believe.

10 Q. Would that be after Pastor Barnett had gone
11 back in and had his services on March 11th?

12 A. No. It was before that.

13 Q. And that prevented him from having that direct
14 dial ability to the campus offices; is that correct?

15 A. Yes.

16 Q. He would have to use a regular telephone to get
17 in?

18 A. Right.

19 Q. Were you requested to put that telephone
20 service back in?

21 A. Yes, I believe I received a memo asking to do
22 that.

23 Q. And did you do it?

24 A. I submitted the memo to the senior elders.

25 Q. I am not asking what you did with the memo.

1 Did you do what you he asked you to do?

2 A. No, I did not.

3 Q. You just told me you followed his direction --

4 MR. LEACH: Is that an argument?

5 Q. (By Mr. Pierce) You told me you were following
6 his direction. I need to know how you --

7 A. By telling him why I would not follow those
8 directions, which, if you recall, our agreement was that
9 if he asked me to do something and I couldn't do it, I
10 would let him know I couldn't do it. So I simply let him
11 know that I wouldn't be able to reconnect the lines.

12 Q. And why weren't you able to reconnect the
13 lines?

14 A. Because at that time I submitted, as I said,
15 the memo to the senior elders, and I let them make the
16 decision as to whether or not to reconnect the lines.

17 Q. I assume you did not connect it because
18 somebody told you not to connect it. Is that correct?

19 A. I asked the senior elders if they wanted these
20 lines to be reconnected, because I had the memo. And
21 they said no, they would respond to Don themselves and
22 explain the situation to him and, therefore, I didn't
23 need to do anything further.

24 Q. I want to know who the senior elder was who
25 actually told you not to do it?

1 A. Scott Hartley.

2 Q. Do you remember what date that was that he told
3 you to do that?

4 A. I don't remember.

5 Q. Was it after March 15, 1988?

6 A. I don't remember.

7 Q. How long had you been taking directions from
8 Scott Hartley with regards to the operations of this
9 business?

10 A. Since the -- since the time that Pastor Barnett
11 was disfellowshipped.

12 Q. Basically, up to March 14, 1988, Jack Hicks had
13 been giving you directions as the general manager of the
14 corporation; is that correct?

15 A. Correct.

16 Q. It was subsequent to March 14th when Jack Hicks
17 resigned that Scott Hartley began giving you directions?

18 A. Yes.

19 Q. Prior to March 14th, you weren't taking any
20 directions from Scott Hartley, were you?

21 A. No.

22 Q. What other directions have you followed of
23 Scott Hartley's with regard to the operations of this
24 business?

25 A. As I mentioned, to take a count at each campus,

1 which I was already doing.

2 Q. Okay.

3 A. And to supply him with a cassette tape if
4 possible of services on both campuses.

5 Q. Would it be normal to have cassette tapes made
6 at both services?

7 A. Oh, yeah.

8 Q. Up until March of 1988 and for the previous at
9 least five years, there was only tapes of the worship
10 services made at the sanctuary on the west campus; is
11 that correct?

12 A. Well, there are tapes made of any meeting
13 basically, any public meeting that takes place.

14 Q. Do you make tapes of elders meetings?

15 A. No.

16 Q. Basically because that is not a public meeting?

17 A. Right.

18 Q. Have tapes been made of each of the services of
19 Pastor Barnett from March 11th to the present time?

20 A. As far as I know, yes.

21 Q. You provided tapes of those to Scott Hartley?

22 A. Yes. In fact I provided tapes to him to bring
23 to you as a result of the duces tecum.

24 Q. The subpoena that he got, he asked you for
25 tapes?

1 A. I got the same subpoena. I supplied him with
2 the tapes.

3 Q. These tapes had been made of all services from
4 March 11th up to the present time?

5 A. Yes.

6 Q. What happens to the tapes once they are made,
7 the original tape?

8 A. The original recording of the service?

9 Q. Yes.

10 A. It is kept in a file for purposes of
11 duplication.

12 Q. Who is in charge of duplication?

13 A. Numerous volunteers under the audio-video
14 coordinator.

15 Q. The audio-video coordinator is who?

16 A. Ashley Young.

17 Q. Ashley who?

18 A. Young.

19 Q. Has Ashley Young been audio-video coordinator
20 during March and April of 1988?

21 A. Yes.

22 Q. Do you have any function in the preparation,
23 distribution, or retention of the audio-video tapes that
24 are made?

25 A. Do I personally?

1 Q. No. Your offices of operations or ministry
2 services.

3 A. Yes.

4 Q. What are those functions?

5 A. I simply oversee Ashley's job performance.

6 Q. Basically Ashley works for you?

7 A. Yes, he does.

8 Q. It is a he?

9 A. He, yes.

10 Q. And do you have master recordings of both the
11 services for the east campus and the west campus from
12 March of '88 to the present time?

13 A. Should have, yes.

14 Q. Up until March 1, of 1988, have tapes of all of
15 the services of Pastor Barnett been distributed to the
16 satellite services?

17 A. Up until when?

18 Q. Up until March 1, 1988?

19 A. Yes.

20 Q. Did that stop at some point in time after
21 March 1, 1988?

22 A. Yes, I believe that has stopped now.

23 Q. When did that stop?

24 A. I couldn't be sure of the exact date. Within
25 the last two to three weeks.

1 Q. Was that done under a written or oral direction
2 to you?

3 A. Oral.

4 Q. That came from whom?

5 A. I guess Scott.

6 Q. Anything else that you can think of where Scott
7 has told you to do certain things or not to do anything?

8 A. Nothing comes to mind.

9 Q. Did you think it was unusual that the tapes of
10 the pastor's services were not distributed to the
11 satellite churches?

12 A. No.

13 Q. Was this a normal procedure, to stop sending
14 these tapes to the satellite churches?

15 A. Tapes have not ceased being sent to the
16 satellite churches. Because this is an unusual time, and
17 we have twice the number of tapes and about half the
18 number of people working, it hasn't always been possible
19 to operate the tape library or the tape recording
20 ministry in the same fashion that it has always been
21 operating. We are under great duress to even basically
22 get checkout copies produced for both campuses. You have
23 to recognize that there has been a fracturing of the
24 corporate structure in the sense that as a result of this
25 church split, some of the volunteers and some of the

1 staff, which makes this whole well-oiled machine run,
2 have either quit, resigned, failed to show up for their
3 jobs, whatever, and it has severely hampered our ability
4 to perform what we normally used to perform. This has
5 taken place in almost all areas. And as a result, most
6 of the satellite churches have received whatever tapes
7 they have requested, either -- of either meetings taking
8 place at either campus.

9 Q. Up to March 1, 1988, was it common for the
10 satellite churches to request a certain tape of a certain
11 worship service?

12 A. No.

13 Q. There was only one; isn't that correct?

14 A. That is correct.

15 Q. When did did the decision come into place that
16 the satellite churches would have to order a certain
17 tape?

18 A. It was a decision by default, basically. We
19 weren't able to produce and send out everything from both
20 campuses to all of the satellites with the same
21 regularity that we normally had. And so we reverted to
22 getting whatever we could to whoever asked for it.

23 Q. How many satellite churches are there?

24 A. Well, I believe you have to define "church"
25 versus "fellowship."

1 Q. How many satellite churches were you sending
2 tapes to?

3 A. Normally, previous to the split, approximately
4 20 different locations.

5 Q. How many tapes would you send to them?

6 A. Off and on over the years, that varied.
7 Anywhere from three to five a week.

8 Q. And how long does it take to duplicate a tape,
9 to make a tape?

10 A. Any tape? It can take several minutes to do
11 appropriate labeling and the duplication and the other
12 things necessary to produce a tape.

13 Q. Am I correct if you are going to send five
14 tapes, and it takes a couple minutes, it might take 10
15 minutes to send a set of tapes to one satellite church.
16 I'm trying to get an idea of what we are talking about in
17 the difficulty of sending the tapes off?

18 A. There is only one person that is totally
19 familiar with that system. She also works for me.

20 Q. Is that Ashley Young?

21 A. No. Maurita Verberg.

22 Q. Spell the last name?

23 A. V E R B E R G, I believe.

24 Q. Okay.

25 A. She is the only one that is familiar with the

1 entire system of sending these tapes, the production, the
2 labeling, and the mailing.

3 Q. Basically, when the income dropped, there was a
4 problem with the amount of funds you had for personnel to
5 be able to maintain a couple of people in this department
6 to send these things out?

7 A. Well, she relies heavily on volunteers,
8 because -- Most of our ministries rely heavily on
9 volunteers. Many of her volunteers have dropped out.

10 Q. Was there a request for more volunteers?

11 A. There have been, yes.

12 Q. Did you talk with the president of the
13 corporation to say that more volunteers were necessary in
14 this area?

15 A. No.

16 Q. How is the president to know, if you don't
17 communicate with him with regard to these needs?

18 A. In all of the years that I have worked at
19 Community Chapel, I have seldom, if ever, communicated
20 with the president on any matters of corporate dealings.
21 And to the best of my knowledge, he has seldom taken a
22 hand in corporate affairs.

23 Q. Up until March 14, 1988, Jack Hicks was working
24 there, and you would respond to Jack Hicks?

25 A. Correct.

1 Q. In fact during the time period you were there,
2 you had a supervisor between you and Donald Barnett; is
3 that correct?

4 A. Yes.

5 Q. You had either Mr. Snoey as your superintendent
6 up until the last eight months, or Jack Hicks as the
7 person who is general manager and vice president?

8 A. Yes.

9 Q. None of those people are there any more?

10 A. Right.

11 Q. You have to go right to the top if you want to
12 have people know about what your needs are?

13 A. Right.

14 Q. Did you go to the president of the corporation
15 and ask about the needs of your staff if you wanted to
16 get tapes out to the satellite churches?

17 A. There is no need. The senior elders are the
18 immediate step between myself and the pastor.

19 Q. Is there something in the bylaws that provides
20 for you to respond directly to the senior elders as
21 compared to the president of the corporation?

22 A. They, in my understanding, are in the position
23 of decision-making in areas of corporate operation in the
24 absence of the general manager.

25 Q. Did somebody tell you that?

1 A. It is my own observation in the bylaws.

2 Q. Here are the bylaws. Tell me where that is in
3 there?

4 A. Okay.

5 Q. Do you have notes that you are referring to at
6 the present time on a yellow sheet in front of you?

7 A. Yes.

8 Q. Does that relate to certain areas of the
9 bylaws?

10 A. Yes.

11 Q. Okay. While you are looking it up -- And if
12 you want me not to ask you questions while you are
13 looking it up --

14 A. That would --

15 Q. Okay.

16 A. Section III --

17 Division 1, Section III, says that all
18 decision-making authority for this corporation shall be
19 vested in the board of senior elders.

20 And Division 1, Section VI, says a
21 decision of the board of senior elders takes precedence
22 over the division head or the deacon board, and if any
23 disagreement cannot be reconciled by two-thirds vote, the
24 pastor shall decide the issue.

25 Q. Let me ask --

1 A. It says -- Article Six says, whenever a
2 decision or vote of the board of senior elders do not
3 specified otherwise, such a decision shall be decided
4 with a minimum two-thirds majority.

5 So in my opinion, the board of senior
6 elders at this time consists of the Pastor Barnett, and
7 Jack DuBois and Scott Hartley, and a two-thirds majority
8 of that group is sufficient to decide on the operation of
9 the corporation.

10 Q. This yellow sheet you have in front of you,
11 when did you make that up?

12 A. I just noted some notes today.

13 Q. In a conference with anybody?

14 A. Speaking with Wyman Smalley, the head of
15 computer services, we discussed these areas.

16 Q. Now, in the 10 years -- excuse me. Eight
17 years? Or 10 years?

18 A. It will be 11 years now.

19 Q. In the 11 years that you have worked there,
20 during that time period, up until March 1, 1988, have you
21 ever gone to the board of directors of this corporation
22 with regards to decision-making?

23 A. I have gone to Jack Hicks. Since he was a
24 member, you could say I went to the board. But --

25 Q. You didn't talk with the other board members

1 during that time period. You talked to him as the
2 general manager of the company?

3 A. Right.

4 Q. You are college educated?

5 A. Yes.

6 Q. Three years of bible college?

7 A. Yes.

8 Q. Three years of college?

9 A. Four years of bible college. Two years of
10 college.

11 Q. Do you know the operations of a business that
12 operates through its officer and employees?

13 A. Un-huh.

14 Q. The board of directors determines theory and
15 the direction the corporation is going to go?

16 A. Yes.

17 Q. But the operation of that business is through
18 its officers, isn't it.

19 MR. LEACH: Well, you know, we have done
20 this now how many depositions? You argue with them each
21 time they say what their authority is and for doing what
22 they are doing. And then you argue with them more.

23 We can do this all afternoon. But
24 this is really getting to the point of being ridiculous.
25 I am objecting to the argumentative nature. The whole

1 preliminary comments, your comment, "You are educated,
2 you have been to bible school, you know how things work,"
3 that is argument.

4 Now, I know it doesn't do a bit of
5 good to object at a deposition. You can keep me here all
6 night. It looks like you intend to. I am fed up.

7 Q. (By Mr. Pierce) You can go ahead and answer.

8 MR. LEACH: What was the question?

9 MR. PIERCE: Would you read it back,
10 please.

11 (The testimony was read.)

12 A. Yes.

13 Q (By Mr. Pierce) Is there a grand master key
14 for the building doors and offices in Community Chapel?

15 A. Yes.

16 Q. Who has a grand master key?

17 A. A number of people.

18 Q. Basically, officers or senior elders?

19 A. No. For the most part, security officers and a
20 couple of the maintenance personnel who need access for
21 repairs, that type of thing.

22 Q. Does Scott Hartley have them?

23 A. I don't recall if he still has one or not. He
24 may have one. I don't know.

25 Q. When did he first get one?

1 A. I don't know. I could check our records.

2 Q. What authority does he have for having a master
3 key at any point in time?

4 A. Basically, master keys were given to those who
5 had a need for access to most of the offices.

6 Q. Is there a policy provision with regards to the
7 keys?

8 A. Yes.

9 Q. Maybe you can show me which exhibit it is in.

10 This Exhibit 107 is a policy
11 concerning keys; is that right?

12 A. Yes.

13 Q. Who prepared that policy?

14 A. I think probably Wayne did some years ago.

15 Q. We don't know who prepared it?

16 A. No.

17 Q. It doesn't have an author?

18 A. It is a compilation of security personnel.

19 Q. What is the date of it?

20 A. Last revised January of '85.

21 Q. R811, at the bottom means first month in 1985?

22 A. Un-huh.

23 Q. Doesn't talk in here who gets keys?

24 A. Subjective.

25 Q. Subjective for who?

1 A. Based on the request.

2 Q. Who makes the determination on a subjective
3 basis?

4 A. The security supervisor.

5 Q. Is that you?

6 A. No. That is Steve Gurr.

7 Q. And --

8 A. And he reports to me. So if he has a problem
9 with making that decision, he would ask me.

10 Q. I take it it would be two people?

11 A. Steve would make it. In his absence, I would
12 make it. Or if he had a problem making that decision.

13 Q. What is the determining factor as to who has a
14 key?

15 A. Their need for a key.

16 Q. That is determined on your or Steve's
17 determination of their need?

18 A. That is correct.

19 Q. And did you make a determination as to Scott
20 Miller not having a key?

21 A. I believe Steve made that determination.

22 Q. Did he talk with you about it?

23 A. I believe he told me after the fact that he
24 decided not to.

25 Q. What did he say to you?

1 A. I don't recall exactly. Simply that there was
2 no basis for giving Scott a grand master key.

3 Q. Is this the policy that talks about not giving
4 out grand master keys?

5 A. This policy refers to not giving out or loaning
6 any key that is checked out to you to anyone, including
7 your spouse.

8 Q. Is there another policy about keys?

9 A. No.

10 Q. This is the only one that is in existence?

11 A. Yes.

12 Q. This one you can change because you are the
13 director of security at the present time?

14 A. That is correct.

15 Q. And did you change the locks on certain doors?

16 A. Yes, we did.

17 Q. When did you change those?

18 A. I don't recall the exact date.

19 Q. Sometime in March?

20 A. Yes.

21 Q. Of 1988?

22 A. That is correct.

23 Q. Was that to prevent access to those areas by
24 Donald Barnett?

25 A. No.

1 Q. Or by persons working with Donald Barnett?

2 A. Yes.

3 Q. But you wouldn't prevent Donald Barnett from
4 going into certain areas; is that right?

5 A. Not if he asked to.

6 Q. Did he request that you change those locks back
7 so his grand master key would work?

8 A. I believe he did in the same memo that we
9 talked about earlier regarding the phone system.

10 Q. How long has he had a grand master key, to your
11 knowledge?

12 A. I think perhaps a couple of years.

13 Q. When did that start, to your knowledge?

14 A. When did what start?

15 Q. When did Donald Barnett's having a grand master
16 key start?

17 A. A couple years ago.

18 Q. Up until March of 1988, no one had any
19 objection with regards to his having a grand master key;
20 is that correct?

21 A. No. I would say that is not correct. There
22 had been numerous discussions that Don probably didn't
23 need a grand master key. And there had been discussion
24 that we should supply him simply a parsonage key.

25 Q. When you got the request by Donald Barnett for

1 you to change the locks back, did you do it?

2 A. No.

3 Q. Were you told not to do it?

4 A. No.

5 Q. Did you contact Scott Hartley with regards to
6 that request?

7 A. No.

8 Q. You made that determination yourself?

9 A. Yes.

10 Q. You had no problem with Donald Barnett being in
11 the area where the locks had been changed, but you didn't
12 want other people in there. Is that a correct statement?

13 A. That is correct.

14 Q. If Donald Barnett wanted to go in those areas,
15 he could. But now he would have to go in with your
16 approval?

17 A. That is correct.

18 Q. Prior to March 1, 1988, he would have been able
19 to go in there as the president with a grand master key;
20 is that correct?

21 A. That is correct.

22 Q. You didn't contact any of the board of senior
23 elders with regard to making this determination on your
24 own?

25 A. No.

1 Q. Did you receive a copy of the restraining order
2 signed by Judge Johnson and the one signed by Judge
3 Bates?

4 A. Not a personal copy, no.

5 Q. Did you review those restraining orders?

6 A. I was shown one to read, yes.

7 Q. Who showed it to you?

8 A. I don't recall.

9 Q. When did you see it?

10 A. Sometime that week that it was sent out.

11 Q. Showing you Exhibit No. 2 and Exhibit No. 3,
12 would you take a look at those documents and tell me
13 which one you have seen?

14 A. Okay. I have never seen this one here. I saw
15 this one. I have never seen this one before.

16 Q. Which one have you seen?

17 A. Exhibit 2, I have seen. Exhibit 3, I have
18 never seen before this time, today.

19 MR. PIERCE: I'm just going to make a copy
20 of this.

21 (A short break was taken.)

22 Q. (By Mr. Pierce) When was the request made by
23 Donald Barnett to change the door locks back?

24 A. I don't recall the exact date. I believe it
25 was on the same memo that we have already spoken about.

1 You probably have a copy.

2 Q. Did you bring the memo?

3 A. No, I don't have a copy with me.

4 Q. Did you get that memo?

5 A. Yes.

6 Q. Where is that memo at the present time?

7 A. I believe it would be in my office.

8 (Exhibit No. 117 was marked
9 for identification.)

10 Q. (By Mr. Pierce) Are there other memos that are
11 back there that you would have received from Donald
12 Barnett?

13 A. Yes, I imagine.

14 Q. I show you what is marked as Exhibit 117. Is
15 that the subpoena duces tecum that you received, or a
16 copy of one that you received?

17 A. It appears to be the same one.

18 Q. Showing you what is marked as Exhibits 107
19 through 116, are those documents that you brought to this
20 deposition in response to the subpoena?

21 A. Yes.

22 Q. Those are documents that have been either
23 prepared by you or under your direction or documents that
24 you have received in your position as the director of
25 service ministries?

1 A. Correct.

2 Q. Now, you say there are other documents that you
3 have that you have not brought. Is there a reason why
4 you haven't?

5 A. To the best of my knowledge, I brought all
6 documents pertinent to the subpoena.

7 Q. We know that you have log sheets that are back
8 there with regards to attendance?

9 A. Okay.

10 Q. And those haven't been brought. There is a
11 reason you didn't bring those?

12 A. I guess I didn't understand that I needed to
13 bring those.

14 Q. Realizing "document" includes everything you
15 could possibly think of, are there any other documents
16 back there that would be responsive to the provisions of
17 this subpoena?

18 A. Not that I am aware of. As far as I know, I
19 brought everything necessary.

20 MR. PIERCE: I wonder where they put your
21 calendar. I want to give that back to you.

22 THE WITNESS: I would like to get that
23 back.

24 MR. PIERCE: I just thought about that.
25 You don't have it.

1 Q. (By Mr. Pierce) Did you speak with Scott
2 Hartley or Jack DuBois with regard to your decision to
3 change the locks on the doors?

4 A. Previous to making the decision.

5 Q. Yes.

6 A. No.

7 Q. Afterwards did you discuss it with them?

8 A. I believe they were told by either myself or
9 Steve Gurr. I don't recall who. But I believe they were
10 told that we had done that.

11 Q. Do you know an individual by the name of Jim
12 Loren?

13 A. Jim Loren, yes, I do.

14 Q. Who is that?

15 A. A member of the church.

16 Q. Does he work as a volunteer at the Community
17 Chapel?

18 A. He had worked as a volunteer up until early
19 March, at which time he resigned and handed in all of his
20 equipment.

21 Q. What position did he act in, what capacity?

22 A. Volunteer security officer.

23 Q. Up until early March of 1988?

24 A. Yes.

25 Q. Was he requested to terminate his services?

1 A. No.

2 Q. He just did it on a voluntarily basis?

3 A. He did it on his own.

4 Q. Was his performance of his duties as a
5 volunteer officer satisfactory?

6 A. Yes, they were.

7 Q. Was there a request to put him back on?

8 A. Yes.

9 Q. Did you do that?

10 A. Yes.

11 Q. Is he presently working as a volunteer?

12 A. Yes.

13 Q. Do you have a number of individuals who have
14 volunteered their services to the chapel for the
15 operations areas that you cover?

16 A. Yes.

17 Q. Has that occurred after March?

18 A. What occurred.

19 Q. Has that occurred after March 1, 1988?

20 A. Has what occurred?

21 Q. A substantial number of volunteers coming
22 forward.

23 A. You mean in addition to the ones we already
24 had?

25 Q. Yes.

1 A. No.

2 Q. Approximately how many have come in as
3 additional volunteers?

4 A. In which areas, specifically.

5 Q. In any of the areas of operations where you are
6 in charge?

7 A. Additional volunteers? Oh, I don't know. Five
8 maybe. It's hard to say, since I don't personally
9 solicit or train or work with the volunteers in all of
10 these areas, the people under me.

11 Q. Are you involved with the sale of books and
12 items in the book store?

13 A. No.

14 Q. Under whose offices would that be?

15 A. Price Northcutt.

16 Q. Does Price work for you?

17 A. No.

18 Q. What division is that under?

19 A. It is a separate department under the church
20 and would normally report to Jack Hicks before he left.

21 Q. Have tapes of the pastor's services been made
22 available at the tape center?

23 A. Yes.

24 Q. Approximately how many tapes are made available
25 of the -- senior elders services at the tape center, per

1 service?

2 A. It varies, depending on the need.

3 Q. Approximately how many have you made up. Let's
4 use last weekend's services as an example?

5 A. Okay. We would probably make about a hundred
6 copies.

7 Q. And that's available for sale or rental? Or is
8 it a checkout or a library system? How does it work?

9 A. Library system or sale if someone prefers.

10 Q. How many of the pastor's services at the west
11 campus are you making?

12 A. The same.

13 Q. Is there any delay in the time period of making
14 those tapes?

15 A. No.

16 Q. They are all made within how long a period of
17 time?

18 A. Usually within a matter of hours after the
19 service ends.

20 Q. You are able to make, within hours after the
21 services end, tapes for both services?

22 A. Yes.

23 Q. Why is it a problem to send tapes to the
24 satellite churches? Sounds like it goes very quickly.

25 A. As I mentioned, there is more involved to

1 sending tapes to the satellites. There is record
2 keeping. We charge them for those tapes. Everything has
3 to be logged as to which tapes we are sending. They have
4 to be put into mailers, et cetera. There are records to
5 keep.

6 As I mentioned the one and only
7 person on staff that knows how to do that happens to have
8 been on a two-week leave of absence beginning with the
9 first weekend of this church split.

10 So we were severely hampered, in that
11 no person on staff was familiar with the system and knew
12 how to carry this out. That's why we went to the system
13 of simply sending them the best we could, representation
14 from both campuses, not necessarily the same sets we used
15 to send, because we weren't sure what that was, and then
16 simply responding to any requests that came and sending
17 whatever they wanted.

18 Q. In other words, you would send out, the best
19 that you could, a copy of the material?

20 A. Right.

21 Q. Send the same material to all of the satellite
22 churches that you sent before?

23 A. That is correct.

24 Q. You continued to follow that procedure up to
25 the present time?

1 A. Yes, I have.

2 Q. Have there been any tapes of the pastor's
3 services on the west campus which have not been furnished
4 to any of the satellite churches?

5 A. Not by my knowledge. To the best of my
6 knowledge, we have sent everything to everybody.
7 Although, like I said, it was messy for a couple of weeks
8 because the individual who normally would do this was not
9 available to do it. So I was relying on volunteers and
10 other staff members who weren't familiar with the system
11 to do the best they could.

12 Q. Did you get a memo dated March 17 from Donald
13 Barnett requesting that you make tapes of the pastor's
14 services available to the entire congregation?

15 A. Yes.

16 Q. As was -- Is there a problem that existed prior
17 to March 17?

18 A. No. There seems to be a problem in the mind of
19 the volunteer that Don appointed to oversee some of the
20 duplication of the tapes of his services. He came to me
21 and felt that I was not doing what Don had asked. I
22 assured him that I was in fact doing that, but that there
23 had been a breakdown in communication amongst the
24 volunteers as well as the staff due to the split, and
25 some things were still in a state of flux trying to

1 determine who was going to do what. And even though I
2 had given specific orders to some people, it hasn't
3 gotten all the way down the line yet. There were periods
4 of confusion where people weren't sure what they were
5 supposed to do. These periods of confusion led to
6 certain tapes not being available at certain times, et
7 cetera.

8 To the best of my knowledge and
9 ability, at this time I have resolved those conflicts.
10 All tapes are available to all parties at both campuses,
11 all services. And we are sending out, to the best of my
12 ability, tapes to the satellites per routine now that we
13 are sort of back in business, you might say. This split
14 created massive corporate confusion. Like I said, you
15 had a well-oiled machine all going in one direction and
16 suddenly had people not knowing exactly what they were
17 going to do any more in their volunteer positions and
18 staff positions.

19 Q. Has this created an increase in the personnel
20 necessary in this tape duplication area?

21 A. Normally it would, yes. But we are not
22 presently attempting to hire anybody. We are trying to
23 make do with added volunteers or simply provide less of a
24 service.

25 Q. Are you providing less of a service?

1 A. For awhile there, we were. I think we are back
2 up to speed. I think we are pretty much back to speed.

3 Q. Is this as an increased cost to Community
4 Chapel, or is it covered by the staff volunteers?

5 A. I think we are able to handle it now,
6 basically.

7 Q. How many people are working under you?

8 A. I don't know the exact figure right now.
9 Probably about 30.

10 Q. Do you communicate to them by oral directions
11 or written directions or both?

12 A. Both, continuously.

13 Q. Do you keep memos of the directions you have
14 given employees in a certain location in your offices?

15 A. Yes. If I write a memo, I keep a copy.

16 Q. Have you written any memos in the months of
17 March or April dealing with the split in these
18 congregations, dealing in any manner with the split in
19 these congregations?

20 A. Yes. I wrote one memo last week that -- to my
21 staff, basically asking them if they got directives from
22 either Don Barnett or from the senior elders directly,
23 that they should refer those requests to me. And I did
24 that as a safeguard for them rather than put them on the
25 spot of having to respond to either the senior elders or

1 to Donald Barnett. I asked them to turn their requests
2 in to me. And I sent that memo around to my staff as a
3 carbon copy of the memo that I sent to the senior elders
4 and a carbon copy to Donald Barnett, explaining that they
5 should contact me if they wanted me or my staff to do
6 something.

7 Q. Now, are there any other memos or written
8 directions or any other documents which would give them
9 any type of direction or communicate with them with
10 regards to this split?

11 A. No, I don't believe so.

12 Q. You worked on a staff reduction program; is
13 that correct?

14 A. Yes.

15 Q. When did you first have contact with anybody
16 with regards to the staff reduction program?

17 A. Jack Hicks initiated the request probably in
18 mid-February for some of the department heads to get
19 together and discuss layoffs in anticipation of necessary
20 budget cuts.

21 Q. This is mid-February that you first had a
22 discussion with Jack Hicks with regard to it?

23 A. I believe it was.

24 Q. The budget cuts were necessary why?

25 A. Simply because we were already beginning to

1 show a deficit. Or I am not sure exactly where the
2 finances stand, because that is not my area. But
3 apparently we were too close to our margins for comfort.
4 So it was determined that some staff would need to be
5 laid off.

6 Q. Were you involved in those discussions and
7 making those determinations with Jack Hicks?

8 A. I was simply asked by Jack to attend these
9 meetings to discuss potential layoffs.

10 Q. The meetings were held between whom?

11 A. Several of the department heads. I don't
12 recall exactly who all was there right now.

13 Q. Was there an initial meeting to discuss budget
14 changes?

15 A. Yes.

16 Q. And that initial meeting was attended between
17 you and Jack. And was anybody else present?

18 A. I don't recall. It seems to me there were
19 perhaps two or three others in the meeting. It took
20 place in Jack's office. I believe possibly Drake Pesce
21 was there. I believe an accountant for the church. And
22 it was just sort of a request by Jack to hold a meeting
23 at some point and discuss this and supply back to him a
24 preliminary of who some of the people could be that could
25 be laid off.

1 Q. I see this March 17th letter which is
2 Exhibit 27. Do you see this?

3 A. Yes.

4 Q. In the second paragraph it says: Last week
5 Jack Hicks requested the department heads meet and draft
6 some solutions.

7 A. Okay.

8 Q. Would that mean perhaps March 10th as compared
9 to mid-February?

10 A. I think that -- no. Mid-February Jack
11 suggested we have this meeting. This then was when Jack
12 actually requested the meeting take place. Up until that
13 time, we hadn't done anything.

14 Q. In mid-February, did you meet with Jack?

15 A. Not on any of these things. It was at that
16 time he said we should hold a meeting to discuss these
17 things. Then here early March, he actually called a
18 meeting as a specific time to do this.

19 Q. And did you discuss it with Jack prior to his
20 calling the meeting?

21 A. No.

22 Q. Then you were present at the meeting with
23 department heads?

24 A. Yes.

25 Q. And that was approximately March 10th?

1 A. Early March, yes. I don't know the exact date.

2 Q. As least the first half of March?

3 A. Un-huh.

4 Q. And at that meeting was there a discussion held
5 with regards to the need to cut back with regards to
6 expenses?

7 A. Yes.

8 Q. And do you recall what else would have been
9 said at that meeting?

10 A. Basically, it was simply who can we cut back
11 and how can we make do without these people, and what
12 areas of service will we have to discontinue if we do cut
13 back people. The figure that was given to us was that we
14 should shoot for something on the order of 30 percent.

15 Q. A 30 percent reduction?

16 A. Reduction.

17 Q. As least as of -- Am I together, that this 30
18 percent reduction was something that Jack had
19 contemplated in February of 1988?

20 A. I think so, yes.

21 Q. How do you know that?

22 A. Well, I guess I couldn't say that I know that
23 he had 30 percent in mind.

24 Q. Okay.

25 A. I guess I wouldn't know that for sure.

1 Q. Did the 30 percent come out in the first half
2 of March, a discussion about a 30 percent reduction at
3 that time?

4 A. I believe it came out at this meeting. The
5 first meeting, based on some figures that either Drake or
6 someone supplied. It was thought that we may need to cut
7 30 or 35 percent.

8 Q. Would it be correct to say that this was --
9 From this March 17th letter that you prepared, can you
10 tell when this meeting would have taken place, the date?

11 A. Let's see. I don't have my calendar any more.
12 Two or three days previous to that. I'm not sure what
13 day the 17th --

14 MR. LEACH: Jack Hicks resigned on the
15 14th. It was before the 14th; is that correct. Would
16 that help?

17 MR. PIERCE: I sure hope so.

18 A. Yeah, it was probably, you know, four or five
19 days before that. I don't know exactly.

20 Q. (By Mr. Pierce) Would it be correct to say
21 about the 9th or 10th of March?

22 A. Sure.

23 Q. Okay. You prepared this letter on March 17?

24 A. Un-huh.

25 Q. And you prepared this memorandum on March 17;

1 is that correct?

2 A. Yes. I sent the memorandum attached to the
3 letter.

4 Q. What is the date you prepared the memorandum?

5 A. Same date.

6 Q. In here it's got three phases, Phase 1, Phase
7 2, and Phase 3. What was Phase 1, to be, immediate cuts?

8 A. Yes, immediate cuts.

9 Q. Item 3 under Phase 1 is Donald Barnett?

10 A. Correct.

11 Q. Did you decide, then, he should be cut?

12 A. This, I have to remind you, was a proposal.

13 Q. Sure.

14 A. Right. And it was a proposal that came out of
15 the meeting.

16 Q. This is a meeting with you and the --

17 A. The department heads.

18 Q. We know on approximately March 9th or 10th that
19 Jack Hicks requested the departments to meet?

20 A. Un-huh.

21 Q. That wasn't the meeting, then. Was there a
22 subsequent meeting where they actually did meet?

23 A. Right. He requested the meeting. And he did
24 not attend the meeting. The meeting took place shortly
25 after his request here, a day or so. And then just a few

1 days following that, I prepared this memo as a result of
2 the meeting.

3 Q. And you were in attendance at the meeting?

4 A. Yes, I was.

5 Q. The department heads talked about their
6 departments; is that correct?

7 A. Correct.

8 Q. Whose department was Donald Barnett in?

9 A. He was in no one's department, obviously. But
10 at that time, as a church, and to the best of our
11 understanding as far as most of us as department heads
12 knew, Donald Barnett was disfellowshipped from the
13 church, and it was our belief that he would not be
14 reinstated and that, therefore, disfellowship obviously
15 meant termination, so he was listed.

16 Q. You had Exhibit 2 prior to your preparing this
17 memo, didn't you?

18 A. Yes.

19 Q. You knew when you prepared this memo that
20 Donald Barnett was to be maintained as the president of
21 the corporation, didn't you?

22 A. Temporarily.

23 Q. Did somebody tell you that it wasn't going to
24 last for a period of time, that you couldn't make him an
25 immediate cut under Phase 1?

1 A. Rephrase the question.

2 Q. Did somebody tell you that you can't cut Donald
3 Barnett or that you could cut Donald Barnett because he
4 was only a temporary person that was going to be there?

5 A. No one told me that, no.

6 Q. When were these Phase 1 cuts to take place?

7 A. When approved. It was simply my job to --

8 Q. You were writing this to Donald Barnett,
9 weren't you?

10 A. Yes.

11 Q. If he was disfellowshipped, you wouldn't be
12 writing to him?

13 A. The man is disfellowshipped at this point from
14 the body of Christ. He is appointed in the interim by
15 the State as our State pastor.

16 Q. You are writing to him because he is the
17 president and pastor under these orders?

18 A. Correct.

19 Q. You knew he wasn't going to be a Phase 1 cut
20 right away, didn't you?

21 A. Of course. I knew none of these cuts could
22 even take place under the restraining order, because no
23 one can be hired or fired under the restraining order.
24 These are simply proposals.

25 Q. You knew that when you prepared this letter?

1 A. I believe that was the case. I'm foggy on
2 exact dates when the restraining order came out.

3 Q. That one is March 11?

4 A. Yeah. So I knew that at the time I prepared
5 this, yes.

6 Q. This one doesn't say anything about you can't
7 hire and fire.

8 MR. LEACH: You know full well this is a
9 restraining order that restrains --

10 MR. PIERCE: Let me ask my questions,
11 counsel.

12 MR. LEACH: Don't try to mislead him.

13 MR. PIERCE: I'm not.

14 MR. LEACH: You are. You know there is a
15 retraining order that says nobody can be hired or fired.

16 MR. PIERCE: You ask your questions at
17 your own time.

18 MR. LEACH: You don't give any between
19 depositions.

20 MR. PIERCE: Did you want to ask questions
21 of Mr. DuBois?

22 MR. LEACH: You said when it was over.

23 MR. PIERCE: You have an opportunity when
24 it is over.

25 MR. LEACH: I will. I have some questions

1 I want to ask.

2 MR. PIERCE: Okay.

3 Q. (By Mr. Pierce) At the time you prepared this
4 letter here, you sent it to Donald Barnett. And did you
5 communicate with Donald Barnett at all?

6 A. No.

7 Q. Did you communicate with any of the elders,
8 senior elders? Excuse me.

9 A. No.

10 Q. Have you been at any meetings with any of the
11 elders of the corporation?

12 A. You mean officially-called meetings.

13 Q. Well --

14 A. Or casual meetings?

15 Q. With more than two elders present.

16 A. Yes. I have been in a couple.

17 Q. When were those meetings?

18 A. One was the -- that Friday, the 11th. And I
19 don't recall the other one.

20 (A short break was taken.)

21 Q. Here is a copy of the retraining order issued
22 by Judge Bates, so you have it for your information.

23 A. Okay. Thank you.

24 Q. Are you aware of Community Chapel hiring a
25 private investigator?

1 A. No.

2 Q. Has anyone even mentioned anything like that to
3 you?

4 A. Of Community Chapel hiring a private
5 investigator?

6 Q. Or any individual who works at Community Chapel
7 or worked at Community Chapel hiring an investigator
8 during the year 1988.

9 A. No.

10 Q. Have you given any employees under your
11 supervision instructions to not follow the directives of
12 the president?

13 A. No.

14 Q. The only thing you have done is to give them a
15 memo which says they are to refer all matters to you.

16 And did you bring that memo with you?

17 A. No, I didn't. I wasn't aware that was part of
18 the duces tecum.

19 MR. LEACH: Don't say that. He will read
20 the whole thing over again to you. I have got it
21 memorized.

22 MR. PIERCE: He is right.

23 MR. JOHNSON: The attachment?

24 MR. LEACH: Yeah.

25 Q. (By Mr. Pierce) Did you say there was an

1 elders meeting on Friday, March 11?

2 A. I think there was a meeting that day, yes. I
3 believe that is the meeting I attended.

4 Q. Any other elders meetings that you attended?

5 A. I think I have attended one or two others. I
6 don't know the exact dates.

7 Q. At the very first one on March 11, 1988, what
8 do you recall occurring at that meeting?

9 A. Discussion as to whether or not to hold a
10 separate meeting on the east campus.

11 Q. And who brought that matter up?

12 A. I couldn't say.

13 Q. Do you recall anything else that occurred?

14 A. No. I think that was the issue.

15 Q. Was it voted upon?

16 A. I believe, yes.

17 Q. Did you participate in that vote?

18 A. No. I am not a voting --

19 Q. Why were you present at that time?

20 A. Because I was asked to be there because of the
21 necessity to check and see if facilities were available.

22 Q. There are two others elders meetings you would
23 have attended between March 11th and the present time?

24 A. Un-huh.

25 Q. You can't recall the dates of either of those?

1 A. Not off the top of my head.

2 Q. What happened at the first of these additional
3 two meetings?

4 A. I believe, to the best of my knowledge, both of
5 these meetings have been just theological discussions in
6 regards to the current state of affairs.

7 Q. What do you mean, theological discussions?

8 A. A --

9 Q. Would it be basically discussions about why
10 pastor Barnett should have been disfellowshipped?

11 A. Yeah, yeah. That would --

12 Q. Can you recall anything else that would have
13 occurred at either one of these meetings, other than
14 reasons for his disfellowship?

15 A. Basically some of the problems that have
16 resulted with staff and some of the conflicts that have
17 arisen out of this split and more or less discussion on
18 possible future events, basically, I guess.

19 (Exhibit 118 was marked for
20 identification.)

21 Q. (By Mr. Pierce) I show you what has been
22 marked as Exhibit 118. Is that a copy of your calendar
23 from the period of March 7, 1988, up to the present date?

24 A. Un-huh. Yes.

25 Q. There are notations on the documents here such

1 as March 11th, where it says: WC, 395, DLB. Would that
2 be west campus, 395 people, Donald L. Barnett?

3 A. Correct.

4 Q. Below that, there is some additional language.
5 What is that?

6 A. E/C, standing for east campus, 582, elders,
7 meaning the attendance at the east campus.

8 Q. This information was given to you by whom?

9 A. Lead ushers or security personnel.

10 Q. You would have made a notation in your book at
11 that time?

12 A. Yes.

13 (Exhibit 119 was marked
14 for identification.)

15 Q. (By Mr. Pierce) I show you what has been
16 marked Exhibit 119.

17 Can you identify that document?

18 A. Yes. It was the one sent to me by Don.

19 Q. A March 17th memo with regards to duplication
20 and checkout of tapes?

21 A. Yes.

22 Q. Did you comply with the terms of that?

23 A. Yes, I did.

24 Q. Now, you have got some notations. Is that your
25 handwriting on this document?

1 A. No, it is not.

2 Q. You don't know whose handwriting that is on the
3 borders?

4 A. Scott Hartley's writing.

5 Q. Did you take that to Scott Hartley?

6 A. Yes. I showed it to him.

7 Q. And he wrote that language that is on the side
8 there?

9 A. That is correct.

10 (Exhibit 120 was marked
11 for identification.)

12 Q (By Mr. Pierce) I show you what has been
13 marked as Exhibit No. 120. Can you identify that
14 document? Is that a memorandum sent to you by Donald
15 Barnett?

16 A. Yes.

17 Q. Again, do you know whose writing that is on the
18 side?

19 A. Scott's.

20 Q. How do you know that?

21 A. I saw him write it on there.

22 Q. Once this exhibit was given to you, you went
23 and talked to Scott Hartley with regards to it; correct?

24 A. Correct.

25 Q. Why is that?

1 A. As I mentioned before, as I saw it in the
2 bylaws at that point, Scott was the -- one of the senior
3 elders, and he had the authority at that time to make
4 decisions.

5 Q. This was under the provisions of the bylaws you
6 previously told us about?

7 A. Yes.

8 Q. Did you talk with Jack DuBois about it?

9 A. He was there at the same time.

10 Q. Did Jack DuBois approve of the very same things
11 Scott approved of?

12 A. As far as I know, yes.

13 Q. Did he say it orally at that time?

14 A. Not to me personally. I know he was there, and
15 I believe he even saw Scott writing. I don't know.

16 Q. Did he know what Scott was writing?

17 A. I would assume. I have --

18 Q. Was he watching him?

19 A. He was sitting next to him.

20 Q. Did you see him watching him? I am just asking
21 you.

22 A. No.

23 Q. Once you got this, did you call Scott and say,
24 "I got a memo from Donald Barnett"?

25 A. I don't know if I called him. At some point I

1 communicated with him I had the memo.

2 Q. Did you want a meeting to be set up with Scott
3 and Jack DuBois?

4 A. No, I didn't call for any meeting.

5 Q. The third paragraph of this memo it says: No
6 other unusual or non-normal changes shall be made without
7 my concurrence. Do nothing different than if you fully
8 accepted me as your pastor and corporation president.

9 See that?

10 A. Un-huh.

11 Q. Did you have any problems with that?

12 A. Yes.

13 Q. Why is that?

14 A. Because I don't recognize him as my pastor. I
15 do recognize him as the State-appointed corporation
16 president.

17 Q. And you realize the State also indicated the
18 pastor, besides the president? Did you know that?

19 A. What are you saying?

20 MR. LEACH: Position of pastor, is what it
21 said.

22 MR. PIERCE: Yes position.

23 MR. LEACH: I don't --

24 A. The State cannot appoint who I choose as my
25 spiritual shepherd.

1 Q. The pastor of the corporation/church, is what
2 the order says.

3 MR. LEACH: Title, position.

4 A. I recognize the State has given him the title
5 of pastor. I do not recognize him as my pastor.

6 MR. PIERCE: May I see that, counsel.

7 MR. LEACH: Yeah.

8 Q. (By Mr. Pierce) Did you go over each one of
9 these paragraphs with Scott Hartley?

10 A. Go over? He read it.

11 Q. Did he read it out loud?

12 A. No.

13 Q. Did Jack read it after Scott read it?

14 A. Un-huh.

15 Q. And did the three of you discuss what to do
16 with regards to each paragraph?

17 A. I think there was some discussion. I don't
18 know that specifically each paragraph -- well, I imagine
19 each paragraph was discussed in some manner.

20 Q. The last one, we talked about the telephone
21 service earlier?

22 A. Right. I think Scott asked me, you know, the
23 difficulty of, you know, restoring the lines or whatever.

24 Q. How difficult is it to restore the lines?

25 A. Not that difficult.

1 Q. Is there a cost involved?

2 A. Minor.

3 Q. Like what?

4 A. \$10.

5 Q. What is that for?

6 A. Basically, staff time.

7 Q. That's not a hard cost; that is an
8 administrative or personnel cost?

9 A. Estimated overhead.

10 Q. How long does it take them to do that; half an
11 hour?

12 A. Might take them a half hour.

13 Q. Is there a monthly charge that occurs for those
14 two extensions?

15 A. Yes.

16 Q. How much is that?

17 A. \$10 each.

18 Q. That would be \$20 per month in additional
19 charges?

20 A. Correct.

21 Q. Did you go over the cost savings with Mr.
22 DuBois and Mr. Hartley?

23 A. They did ask me how much it costs.

24 MR. PIERCE: Do you have to make a call?

25 THE WITNESS: Yes, if I might.

1 (A discussion was had off
2 the record.)

3 (A short break was taken.)

4 Q. (By Mr. Pierce) Could you give me a broad
5 overview of the operations --

6 Excuse me. Maybe we have this
7 already.

8 We were talking about facility use.
9 That would be with the worship services?

10 A. All of the use of the facility.

11 Q. At the present time, are there any problems
12 with the use of the Community Chapel by either one of the
13 groups, either the pastor's group or the senior elders'
14 group, for times other than the worship services?

15 A. Is there a problem?

16 Q. Yes, with the use of the facilities?

17 A. No.

18 Q. If they want to have a Wednesday meeting to use
19 the facilities, would there be any problems at all?

20 A. No. We try to accommodate. Well, there has
21 been a problem. In the one document I gave you from the
22 facilities coordinator, Ron Gerrard, he mentioned that
23 Don has called some meetings without checking with
24 facilities to see if they were available. Consequently,
25 there are a lot of people in the room, no heat, no

1 lights.

2 Q. Security doesn't know about it?

3 A. Nobody knows about. It created some problems.
4 He expounded in the memo. I exhibited the memo to show
5 you.

6 Q. Is that all taken care of now?

7 A. I hope so.

8 Q. Is there a procedure for reserving rooms or
9 areas?

10 A. Yes, there is.

11 Q. Is it first come, first serve.

12 (A discussion was had off
13 the record.)

14 Q. (By Mr. Pierce) Is it on a first come, first
15 serve basis?

16 A. Yes.

17 Q. Is that the way you are operating the
18 facilities management to reserve those rooms?

19 A. Yes.

20 Q. Is there any problem with regards to security
21 at the present time for the two groups using the
22 property?

23 A. No. I think I have that pretty well ironed out
24 now.

25 Q. Can you tell me what increases in the expenses

1 for this corporation there are with the two groups using
2 the property?

3 A. Janitorial increases. And utility increases.

4 Q. Electric, that type of thing?

5 A. Right. Water, you know.

6 Q. Have you made any determination of what those
7 additional costs are?

8 A. No, I haven't, not yet.

9 Q. Have you requested that the accounting
10 department provide that information to you?

11 A. No.

12 Q. Is it possible for them to provide that
13 information to you?

14 A. Yes, they could.

15 Q. Taking an average over a period of time?

16 A. They could probably at this point project
17 percentage of increase.

18 Q. Would that be Drake? Or that would be which
19 man?

20 A. That would be Drake.

21 Q. How do you work with which man?

22 A. Usually I don't.

23 Q. Is there any interaction in your groups? Is
24 there any interaction in your departments?

25 A. Minor. As facilities coordination dictates,

1 maybe we need a new terminal some place, I contact which
2 man, and we work out the details of running wiring and
3 working out computer terminals. It is basically
4 day-to-day operation that brings us together on occasion.

5 Q. Electronic services, is that different than the
6 tapes?

7 A. Right.

8 Q. What is electronic services?

9 A. Repair, maintenance, up-keep, installation of
10 electronic gear, soundboard gear, tape recorders, just
11 maintenance, you might call it.

12 Q. Is that maintenance of all property of the
13 Community Chapel?

14 A. Yes.

15 Q. Do you know what the maintenance cost is for
16 the parsonage per year?

17 A. Oh, let's see. Top of my head, probably runs
18 around 15 thousand or something like that. I would
19 guess.

20 Q. What does that cover, the maintenance?

21 A. All maintenance. It covers everything except
22 Don's personal effects inside the parsonage.

23 Q. Boy, you are going to have to tell me what that
24 means.

25 A. All of grounds, up-keep and maintenance. All

1 of the building up-keep, maintenance. Carpet maintenance
2 and cleaning. Interior cleaning. Routine servicing of
3 the built-in hot tub and all of the attendant pumps and
4 things that go with it. There is a stream out back that
5 operates with a circulation system, et cetera. On and
6 on. Could be web removal.

7 Q. Would it be basically a cleaning service,
8 maintenance of the grounds and the building?

9 A. Yes.

10 Q. Does that 15 thousand include security that
11 would come by the parsonage, too; or is that not
12 included?

13 A. I don't think that would include that. I
14 believe that would be additional.

15 Q. Security still comes by that property; is that
16 correct?

17 A. Yes.

18 Q. Grounds up-keep, property maintenance, has that
19 been cut back?

20 A. Yes.

21 Q. Has it been requested that it be restored?

22 A. No.

23 Q. Who told you that it was going to be cut back?

24 A. Scott.

25 Q. Did you ask him about it, what areas it should

1 be cut back?

2 A. He basically told me that we should cut back
3 all areas from maintenance.

4 Q. Did he ask you before he cut back what the cost
5 would be that we are talking about here?

6 A. No.

7 Q. Did --

8 A. I think he probably had those figures himself.
9 I don't recall him asking me.

10 Q. Have you seen those figures yourself somewhere
11 else?

12 A. No, I don't think I personally looked at those
13 figures recently.

14 Q. Where are those figures located, is what I am
15 wondering?

16 A. Drake would have those figures, a compilation.

17 Q. Where would you find those figures on the
18 documents?

19 A. I would probably just call Drake and ask him,
20 "What have we spent in the last year to maintain the
21 parsonage?"

22 Q. Would you look those figures up on a financial
23 statement?

24 A. No. I would have a little trouble pinpointing
25 that.

1 Q. You basically rely on Drake?

2 A. Right.

3 Q. As most people do with regards to the
4 accounting aspects?

5 A. Right. I would get to those figures if I
6 need to. Since I have a man I could tap for that
7 information --

8 Q. Are you familiar with financial statements and
9 documents?

10 A. Mildly. Enough to operate my own department.
11 But since I have only been the director for eight months
12 previous to that time, Wayne kept most of that
13 information himself.

14 Q. I will show you Exhibits 58 through 78 here.
15 Would you take a look at those. Those would be what is
16 represented, I believe, to me, to be all of the documents
17 relating in any manner to the dissolution. Can you
18 discern what that information is from any of the
19 documents?

20 MR. LEACH: Can he discern them?

21 MR. PIERCE: Discern.

22 MR. LEACH: Isn't that what I said?

23 Do you want to know if he can discern
24 the facts and figures? Or does he recognize them?

25 MR. PIERCE: Either one?

1 A. I don't normally use these documents. If I
2 were to study them, I could probably come up with the
3 information you are asking. Just off the top of my head,
4 no.

5 Q. (By Mr. Pierce) Are there other documents
6 provided to you for your use that you normally look at?

7 A. There would be if I asked. But since I have
8 only been in the position of director for for eight
9 months, I have relied heavily upon others to supply me
10 this information in the interim.

11 Q. Have you asked for those documents in the past,
12 to see this information that you are talking about?

13 A. No, I haven't.

14 Q. Again, if Donald Barnett requested you to
15 restore these maintenance items for the facilities, would
16 you do it?

17 MR. LEACH: This is the third time I think
18 it has been asked. See if he be can be consistent; is
19 that what you are trying to do?

20 MR. PIERCE: Simple attorney; don't
21 remember everything I ask. I'm sorry.

22 MR. LEACH: Okay.

23 A. Would you rephrase the question or restate it?

24 Q. (By Mr. Pierce) If Donald Barnett asked you to
25 restore those maintenance items for the parsonage, would

1 you do that?

2 A. At this point, I would refer him to the senior
3 elders. I would ask him to please work out with them
4 what he would -- what they want me to do, and then I
5 would do as instructed.

6 Q. Instructed by whom?

7 A. Him or them, if they were in agreement.

8 Q. If they weren't in agreement, would you --

9 A. Then I will not.

10 Q. Did you seek out the agreement -- Did you tell
11 Scott Hartley, when he requested you to cut these
12 services off, that you would need the agreement of both
13 he and Donald Barnett?

14 A. No.

15 Q. Are we using one system for one party, the
16 senior elders, and one system for Donald Barnett?

17 A. What do you mean by "system"?

18 MR. LEACH: Seems like he has been very
19 consistent.

20 Q. (By Mr. Pierce) If Scott Hartley requested you
21 to do it, you would do it without talking to Donald
22 Barnett; if Donald Barnett asks you, you don't do it
23 until you talk to Scott?

24 A. That is correct.

25 Q. Is that the same procedure you intend to follow

1 in the future?

2 A. Yes, until the situation can be resolved.

3 Q. By "resolved," what do you mean?

4 A. Either there can be some agreement between the
5 senior elders and Don, or the court determines that a
6 dissolution takes place, in which case some third party
7 would be who I would answer to. Or if the -- Don is
8 reinstated fully at the end of this mutual restraining
9 order time, at that time I will probably tender a
10 resignation.

11 Q. On this calendar which is Exhibit 119, on the
12 second page, it has an entry for March 14th, 9:00 o'clock
13 DLB meeting.

14 Can you tell me what that is?

15 A. I believe that was a notation I put down that
16 Don came into my office and we spoke for awhile. I
17 simply put it down for my memory.

18 Q. Was that a staff meeting called by Donald
19 Barnett for 9:00 o'clock A.M. on that date?

20 A. No. That was just -- I believe he just --

21 Let me think. Yeah, I think that was
22 a staff meeting.

23 Q. Did you attend that staff meeting?

24 A. I'm trying to recall. There were a couple
25 different meetings. If that was the meeting that took

1 place in the chapel or not, I don't recall right now.

2 Q. Did you attend it?

3 A. I attended a meeting in the chapel. I don't
4 remember if this is that meeting or not.

5 Q. Did you attend a meeting in the chapel
6 conducted by Donald Barnett?

7 A. No.

8 Q. You attended one conducted by Scott Hartley?

9 A. Yes.

10 Q. Is there a reason you didn't attend the staff
11 meeting called by Donald Barnett?

12 A. Yes. Because instead of attending, I submitted
13 my name on the letter along with the other staff members.

14 Q. That you weren't going to attend because you
15 weren't going to follow him as your corporate employer?

16 A. Right.

17 Q. Now, next, on Thursday, March 24th, there is an
18 entry showing 1:00 o'clock, elders meeting. It appears
19 to be "studio" after it?

20 A. Correct.

21 Q. Is that a meeting you attended of the elders of
22 Community Chapel?

23 A. I don't believe I attended that. I simply made
24 the notation because I was -- used that room for
25 facilities-use purposes.

1 Q. On the next day, Friday, March 25th, there is
2 another entry here. It says Brian B., Janis, Scott, Jim,
3 10-7. And I can't read the remaining.

4 A. 6:00.

5 Q. 10-7, 6:00?

6 A. Yes.

7 Q. What does that mean?

8 A. It means I went home at 6:00.

9 Q. What does 10-7 mean?

10 A. Means out of service. It means I went home. I
11 keep a time sheet.

12 Q. Is this a code that is used?

13 A. Yeah.

14 Q. 10-11, is that another code?

15 A. No. Where do you see 10-11?

16 Q. I see it earlier on the 25th?

17 A. That is 10 to 11 o'clock.

18 Q. Is that a meeting?

19 A. Right.

20 Q. And the Scott H., is that a person who was
21 attending this meeting?

22 A. No.

23 Q. I see Scott H. And it appears to be Jim Leech
24 underneath it.

25 MR. LEACH: That is not my name.

1 A. Right.

2 Q. (By Mr. Pierce) Is that a meeting you attended
3 with Jim Leech?

4 A. It was a phone call. I jotted that down, that
5 I spoke with Scott. And I jotted down I spoke with Jim.

6 Q. Do you recall what occurred in the conversation
7 with Jim Leech on October 25, 1988?

8 A. I don't remember what that particular phone
9 call was about.

10 Q. Did you call him, or he call you?

11 A. I don't recall that.

12 Q. Do you recall what occurred in the telephone
13 conversation with Scott Hartley on that date?

14 A. No, I don't.

15 Q. Did it involve --

16 A. Oh.

17 Q. Did something --

18 A. Yes. I remember what I talked to Scott about.

19 It was about Brian Brookbank, the entry up above there

20 that says Brian came in that morning and wanted to --

21 Well, he admitted to me -- Brian is one of Don's

22 volunteers. And Brian admitted to me in that meeting

23 that he was considering stealing the tape library, which

24 is one of the reasons I hesitate to have Don's grand

25 master being given around to people of this caliber. And

1 he then went on to say that, you know, he really didn't
2 want to do that, but he felt that he wanted to safeguard
3 those tapes. And so he considered stealing them. But
4 instead of doing that, he came in to talk to me to see if
5 we couldn't give him copies of everything in the tape
6 library, in case there was a dissolution of the
7 corporation, he would have copies if anything happen to
8 the existing tape library.

9 I mentioned to Scott Hartley that
10 this has taken place and that he had come in to see me
11 with this request.

12 Q. In the middle of all this is Janis. Who is
13 Janis?

14 A. One of the people that works for me. A lead
15 dispatcher. It is a normal meeting. As you can see,
16 there are several meetings on here penciled in various
17 places. These are normal weekly meetings I have with the
18 supervisors of some of the different areas that work for
19 me. You see on the next page, 10 to 11, JM again. That
20 is, again, Janis.

21 Q. In fact, you schedule these things in the
22 future, too, it appears?

23 A. I usually try and schedule for several months
24 in advance, if possible.

25 Q. Now on this Exhibit 106, you have figures that

1 talk about an estimated -- Number 1 on this is an
2 estimated 2200 people, including children, before the
3 church split?

4 A. Yes.

5 Q. When was that date, that the 2200 figure was?

6 A. Last October.

7 Q. Was that considered to be good information
8 through January and February of 1988?

9 A. Yes.

10 Q. Item 2 has approximately 1220 people, including
11 children, that attended at the services before the split?

12 A. Average, yes.

13 Q. Where does this information come from?

14 A. As I mentioned, each year in October I do a
15 count. And in a notebook -- I call it growth trends, and
16 I simply keep track year after year the approximate
17 attendance, do a count of the phone book, and take a
18 count in the service so we can see the trend.

19 I also collect information on the
20 school attendance.

21 Q. So --

22 A. It is inclusive of all of the different
23 attendances, Christian school, bible college, number of
24 people in the phone book, that type of thing.

25 Q. That's where the 1220 comes from?

1 A. Yes. That is an average.

2 Q. Phone book people, we have on item No. 3.

3 A. Un-huh.

4 Q. Do you have the figures that were used to
5 calculate this 1220 people without children or including
6 children?

7 A. Do I have those figures?

8 Q. Yes.

9 A. Not with me.

10 Q. Where would they be?

11 A. In the notebook.

12 Q. That growth book is available?

13 A. Yes.

14 Q. Exhibit 108, what is this?

15 A. This is a log that the dispatch desk keeps of
16 incidents that take place of note. And I brought a copy
17 of this page because it shows the two different incidents
18 that took place, one where Jeff Becker, Don's appointed
19 electronics -- not electronic, but appointed tape
20 volunteer admitted to pulling some wires in some of the
21 electronic equipment, cutting off some of the service to
22 the east campus.

23 Q. Cutting off the service to the east campus.
24 What do you mean?

25 A. We have a direct line that allows the west

1 campus to be -- the meeting taking place at the west
2 campus to be heard at the east campus.

3 Q. Were there people at the east campus that
4 wanted to hear what was going on at the west campus?

5 A. Yes, there was.

6 Q. For other than security?

7 A. Dispatch normally monitors that. It is one of
8 the systems.

9 Q. Extra protection?

10 A. Yes. And Mr. Becker, with no authority, went
11 into this area and pulled the wires.

12 Q. Did he say somebody told him to do it?

13 A. No.

14 Q. Somebody ask him?

15 A. He did it on his own, as far as I know. I
16 asked him later.

17 Q. Second item?

18 A. Second item, we had heard Don had given Scott
19 Miller his grand master key. One of the officers, Chet
20 Kerr, confronted Scott and asked him if he did in fact
21 have Don's key. Scott admitted he did. I believe there
22 is a memo where also Joe Bloom, another officer, asked
23 Scott.

24 Q. The other memo is 109, a conversation that Joe
25 Bloom had with a Jim Moran. That isn't an incident

1 involving Scott Miller. The only item is the one on
2 Exhibit 108; is that right?

3 A. Okay. He says Joe Bloom also personally asked
4 Scott, and he did have DLB's keys. We have two separate
5 incidences.

6 Q. It wasn't a use of the key, was it, in Exhibit
7 109?

8 A. Obviously, he was using the key. And both of
9 these officers can testify that Scott was using the key
10 in his normal duties.

11 Q. That Scott was?

12 A. Scott, yes, absolutely.

13 Q. The first one is -- What is the date on this?
14 Can you tell me the date on Exhibit 108?

15 A. The 13th.

16 Q. And --

17 A. This is the 20th.

18 Q. The 13th we know that the complaint is that
19 Donald Barnett gave Scott Miller his grand master key.
20 Is that the location, the parsonage? So apparently it
21 was to get into the pastor's residence; is that correct?
22 Would that appear to be it, to you?

23 A. No. There's where this officer would have been
24 at the time he talked to Scott Miller.

25 Q. So we don't know -- We don't even know if there

1 is a use of it, then?

2 A. I know there is a use -- has been consistent
3 use of it. All of these officers while working have
4 observed Scott using the key at the west campus to open
5 and close doors.

6 Q. Do they make reports with regard to the use of
7 that key?

8 A. There it is. Yes, they do. This is a log
9 entry. There will be in some cases -- Let's see.

10 Q. Are there more log entries involving Scott
11 Miller and the key?

12 A. Other than this one?

13 Q. Yeah.

14 A. I believe this would be the only log entry.

15 Q. The officers make log entries if they see
16 something unusual happening on Community Chapel property?

17 A. Yes. This is unusual. It is unusual for him
18 to have a key. Therefore, once they make this entry, if
19 he continued to have a key and continued to unlock, they
20 would not consider it at that point any more unusual,
21 once they reported to me.

22 Q. Did Officer Kerr indicate to you that Scott
23 Miller was using that key at the parsonage?

24 A. He indicated to me that Miller was using the
25 key at the west campus.

1 Q. Not on this occasion here? That is at the
2 parsonage.

3 A. This simply justifies that's where he talked to
4 Miller. That was the location of their discussion.

5 Q. Yeah. Okay. Is there another one that says
6 that -- where Scott Miller said he was using the key or
7 where the officer said he saw him?

8 A. This one.

9 Q. So let's go to Exhibit 109. I take it from the
10 letter Joe Bloom -- This was prepared by Joe Bloom?

11 A. Yes.

12 Q. The last sentence: I then personally asked
13 Scott, and he said he does have DLB's keys.

14 That would be Donald Barnett's keys?

15 A. Un-huh.

16 Q. Did Joe tell you --

17 A. Joe told me of his conversation with Scott.
18 And I asked him if he would please jot me a note. And he
19 did.

20 Q. Did Joe tell you where he saw Scott Miller
21 using the key?

22 A. I don't recall.

23 Q. Do you know of another church being formed at
24 the present time?

25 A. No.

1 Q. Has anybody provided you with any information
2 that would lead you to believe there is another church
3 being formed at the present time?

4 A. I have heard that Donald Barnett has been
5 using, or someone in his circle has been using, the term
6 Tabernacle Fellowship. And I understand that may even be
7 the term they're using for a bank account that they have.

8 Q. And who did you hear this from?

9 A. Grapevine. I don't recall exactly.

10 Q. I show you Exhibit No. 112. There is a list of
11 items. Number 1 is people that have already resigned?

12 A. Un-huh.

13 Q. Item 2 have submitted resignations, not yet
14 terminated their services?

15 A. Right.

16 Q. Item 3 is employees who have resignations
17 pending if Donald Barnett remains the pastor.

18 Did you talk with these people? Is
19 this employees that have resignations pending?

20 A. These are fact. These are written. These are
21 tentative based on the outcome of this proceeding.

22 Q. What did Linda Krenelka tell you?

23 A. My wife?

24 Q. Is that who Linda Krenelka is?

25 A. Yes.

1 Q. What did she tell you?

2 A. She told me if I resigned she would also.

3 Q. What did Scott Hartley tell you?

4 A. That basically, I guess, if ultimately Don ends
5 up being in the pastoral position of the church when
6 these proceedings are over, that he also would have to
7 resign.

8 Q. Do you recall when he told you that?

9 A. No.

10 Q. What period of time did you talk with these
11 individuals?

12 A. It would be random. I cannot say that I have
13 specifically spoken with every one of these individuals
14 myself. This list is somewhat inclusive of the list of
15 people that signed the letter, saying they would not
16 follow Don. And in speaking with other department heads
17 and all of the people that work for me, many of which are
18 on this list, for the most part, these people have all
19 indicated that if once this is resolved and Don is fully
20 restored, so to speak, then they would basically have no
21 other option but to look for work elsewhere.

22 Q. You do know that Scott Hartley told you that?

23 A. Not in so many words. I guess I would just say
24 I would be led to believe that Scott is also of that
25 opinion.

1 Q. So now we know he hasn't told you directly.
2 What has he told you that would lead you to that
3 conclusion or opinion?

4 A. Simply that he will be unable to recognize Don
5 as pastor in the future, so that basically if Don ends up
6 as pastor and president when all of these proceedings are
7 over, that he would basically have to resign along with
8 everyone else.

9 Q. After he told you that, did you ask him what
10 would he do in the future, or anything to that effect?

11 A. No.

12 Q. Did you have any questions about what the
13 future held for you and Scott Hartley and your church and
14 your religion?

15 A. I could only assume that I would have to find
16 another church, and that if a large enough number of the
17 people who left this church wanted to, at some future
18 time, start another church, that I might consider being
19 part of that.

20 Q. Did you talk about forming a new church or
21 being involved with him in any future organization?

22 A. No, I have not.

23 Q. I show you what has been marked as Exhibit 113.
24 Can you tell me what that is?

25 A. This is a letter from Price Northcutt to the

1 general manager. But in the absence of the general
2 manager, Price sent me a photocopy of it. He wasn't sure
3 who to give his resignation to.

4 A. It refers to Marlene being disfellowshipped
5 this Wednesday?

6 A. Yes.

7 Q. Who is Marlene?

8 A. One of his staff employees.

9 Q. Disfellowshipped by whom?

10 A. I would assume the counseling center.

11 Q. Would it be the senior elders again
12 disfellowshipping somebody?

13 A. Not necessarily. Our normal procedure would be
14 that the counseling center would make a recommendation,
15 and it would be approved by, I believe, Don Barnett. And
16 then the person would be notified.

17 Q. Do you approve pay checks for individuals?

18 A. Do I approve them?

19 Q. Yes.

20 A. No.

21 Q. This is what is marked as Exhibit 115.

22 Can you tell me what that is?

23 A. This is the notice that I referred to earlier
24 from Ron Gerrard, simply mentioning to me that there were
25 some problems as a result of supporting two campuses.

1 Q. This is dated about six days ago, or seven days
2 ago?

3 A. Yes.

4 Q. And did you request that Ron make this up?

5 A. No.

6 Q. Did you talk to Ron with regards to any
7 communications to you with regards to problem areas?

8 A. It is a normal recourse that he would just
9 contact me if he had problems.

10 Q. Is it normal to put it in writing?

11 A. Oh, yeah.

12 Q. Do you have other memos from Ron to you?

13 A. No. This is the only one I have at this time.

14 Q. It seems kind of unusual that this -- I am not
15 arguing with you. I'm trying to figure --

16 A. I get other memos from Ron. This is the only
17 memo I have in regards to the situation resulting.

18 Q. Okay. Exhibit 116 is the letter that you
19 signed to Donald Barnett, which has your signature on it?

20 A. Yes.

21 MR. PIERCE: I have nothing further.

22 Counsel?

23 MR. JOHNSON: Give Jim here an
24 opportunity.

25 MR. LEACH: Wonderful. Thank you.

E X A M I N A T I O N

1
2 BY MR. LEACH:

3 Q. That termination list, all of those names are
4 not going to plan to be terminated immediately; is that
5 correct?

6 A. You are referring to the letter I sent?

7 Q. To the proposed termination, whatever it is.

8 MR. JOHNSON: This one?

9 MR. LEACH: Not that one. The reduction
10 in force letter.

11 A. No. That is simply --

12 Q. (By Mr. Leach) The first name on the list
13 actually was Donna Moren, wasn't it?

14 A. Just recommendations.

15 Q. Who is Donna Moren?

16 A. She is the director of the Christian school.

17 Q. Was it contemplated by you that she be
18 terminated?

19 A. In our meeting, we discussed that as one of the
20 options, yes.

21 Q. Are there plans to terminate the Christian
22 school?

23 A. To terminate it.

24 Q. To stop it?

25 A. No.

1 Q. But how do you run it without the principal?

2 A. We recognize that there are other people that
3 can cover these areas between now and the end of the
4 school year.

5 Q. Okay. The telephone lines. I would like to
6 talk about this. Do your staff put in at all the lines
7 yourself?

8 A. Yes. We are basically self-sufficient.

9 Q. It doesn't take PNB to install those lines?

10 A. Let's put it this way. It does take them to
11 install the lines to the parsonage, because those are
12 called off-the-premises extensions, OPSS. Once they are
13 in, then we have to do all of the termination work at
14 both ends. They simply supplied us a line between the
15 two locations. We do all of the termination work at both
16 ends, and the programming of the extensions, et cetera.
17 All of that is done in house.

18 Q. So the lines are already there? They wouldn't
19 have to do anything?

20 A. The lines are there. What would have to be
21 done is a reprogramming on the customer administration
22 panel and a physical reconnection of the circuits in the
23 main telephone equipment rooms at both ends.

24 Q. PNW doesn't have to be involved with any of
25 that?

1 A. No.

2 Q. They spent a great deal more time and lawyer
3 expense on telephone lines than it does to hook it up, I
4 think.

5 MR. PIERCE: Noted for the record counsel.

6 MR. LEACH: Noted for the record. All
7 right.

8 I have no other questions.

9 (By agreement between
10 counsel and the witness,
11 signature was waived.)

12 (The deposition concluded
13 at 5:42 P.M.)

14

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C E R T I F I C A T E

STATE OF WASHINGTON)
COUNTY OF KING)

I, the undersigned officer of the Court under my commission as a Notary Public in and for the State of Washington, hereby certify that the foregoing deposition upon oral examination of the witness named herein was taken stenographically before me and thereafter transcribed under my direction;

That the witness before examination was first duly sworn by me to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript of the testimony, including questions and answers and all objections, motions, and exception of counsel made and taken at the time of the foregoing examination;

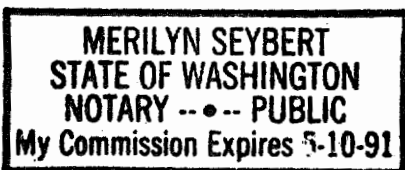
Page 1 of 2

Rough & Associates
Incorporated
COURT REPORTERS

400 SEATTLE TOWER
SEATTLE WASHINGTON 98101

That I am neither attorney for, nor a relative or employee of any of the parties to this action; further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially interested in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 11 day of April 1988.



M. Seybert
NOTARY PUBLIC in and for the
State of Washington residing at
Seattle

Page 2 of 2

Rough & Associates
Incorporated
COURT REPORTERS

405 SEATTLE TOWER
SEATTLE, WASHINGTON 98101
(206) 682-1427

106
4/6/88
L. KOBENKA
TX
DEPOSITION INFORMATION

EXHIBIT B

ATTENDANCE FIGURES

1. Before the church split the congregation size was estimated at approximately 2200 people including children.
2. Before the split the average attendance at services was approximately 1220 people including children.
3. The church phone book entries numbered at 1561. This figure does not include children.
4. The attendance at services since the church split are as follows:

Friday	03/11/88	West Campus	395
		East Campus	582
Sunday AM	03/13/88	West Campus	240
		East Campus	625
Sunday PM	03/13/88	West Campus	295
		East Campus	700
Friday	03/18/88	West Campus	254
		East Campus	620
Sunday AM	03/20/88	West Campus	286
		East Campus	500
Sunday PM	03/20/88	West Campus	276
		East Campus	513
Friday	03/25/88	West Campus	325
		East Campus	637
Sunday AM	03/27/88	West Campus	265
		East Campus	550
Sunday PM	03/27/88	West Campus	235
		East Campus	584

4. The attendance at services since the church split cont.:

Friday	04/01/88	West Campus	392
		East Campus	602
Sunday AM	04/03/88	West Campus	255
		East Campus	350
Sunday PM	04/03/88	West Campus	260
		East Campus	369

5. The present average attendance of both services combined is approximately 840.
6. Comparing the pre-church split figures with the post-church split figures the average number of people not attending are 380.

DEPOSITION INFORMATION

EXHIBIT C

MEMORANDUM

EXHIBIT **107** FILED **4/6/88**
BY **L. MRENELKA**
ALBANY COUNTY CLERK **THX** 682 1421

TO: All Keyholders
FROM: Security

RE: POLICIES CONCERNING KEYS

1. Report lost keys to Security immediately, no matter the time of day. Failure to do so may result in not getting your keys returned or replaced.
2. Do not enter rooms or offices, or open them for someone else, unless the department head for that area has authorized you to do so. Special authorization is not your responsibility. See Security for such authorization.
3. Never let anyone into any building after it has been locked. Any time a building is locked, it is off-limits to everyone except those who have keys and only then during accessible hours for keyholders. Refer special requests to Security.
4. Before entering a locked building or room, be sure you know the accessible hours. If unsure, refer to the "Accessible Hours for Keyholders" card (copies available from Security). If you need to enter a building or room before or after accessible hours, you must first contact the Security officer on duty and obtain his permission.
5. Do not touch, turn on, or turn off typewriters or computer equipment in any office or use any equipment without authorization from the department head for that area.
6. Do not give or lend your keys to anyone, including your spouse (he or she will not necessarily know our guidelines). Persons without keys should contact Security for special unlocks.
7. Do not use your key as an office check-out copy without authorization from Security to do so.
8. Guard your keys carefully. They are your responsibility. We recommend you keep your church keys on your personal key ring. Having two key rings makes it easy to misplace one. Continued irresponsibility will mean you will be denied keys, despite your need for them.
9. When you no longer need a key, return it only to Security. Do not give it to your supervisor or the person replacing you.

H-SMA1
R851

100
W. MREVELKA
TAX
7/6/88
882-1427

88-0299

Incident #: 88-0299	R.P. JACK OSBORNE	Date: 03-13-88	Rec. call: LATE
Location: C-103	Complaint: JEFF BECKER ADMITS TO PULLING THE WIRES THAT DOES NOT ALLOW DISPATCH TO HEAR THE SERVICES AT THE SANC.		Dispatch: ENTRY
Officers: C. KERR			Arrival: -----
Dispatcher: CM	OCCUR 03-11-88 FRIDAY P.M. SERVICE.		Completed: -----
Grid: 4	Disposition: J. OSBONE WILL TAKE CARE OF IT		W/O =
Offense: 708			Damage:
Disp. code: C			Recovered:
			Loss:
Incident #: 88-0300	R.P. CHUCK KERR	Date: 03-13-88	Rec. call: 1050
Location: PARSONAGE	Complaint: D.L.B. GAVE SCOTT MILLER HIS GRAND MASTER KEY. SCOTT PROMISED TO NOT USE THE KEY UNETHICALLY.		Dispatch: -----
Officers: C. KERR			Arrival: -----
Dispatcher: CM			Completed: 1100
Grid: 1	Disposition: SCOTT WOULD NOT GIVE UP THE KEY -- IT IS DON'S KEY.		W/O =
Offense: 807			Damage:
Disp. code: A			Recovered:
			Loss:
Incident #: 88-0301	R.P. CHUCK KERR	Date: 03-13-88	Rec. call: -----
Location: C-402	Complaint: SOMEONE TOOK A PENKNIFE IN ONE OF THE STALLS AND CUT IN GENE DEROGATORY COMMENTS ABOUT D.L.B.		Dispatch: -----
Officers: C. KERR			Arrival: 1115
Dispatcher: CM			Completed: 1125
Grid: 7	Disposition: G. HAGGERTY TEMPORARILY COVERED IT WITH TAPE. WORK ORDER WRITTEN.		W/O = 88-0251
Offense: 708			Damage:
Disp. code: C			Recovered:
			Loss:
Incident #: 88-0302	R.P. USHER	Date: 03-13-88	Rec. call: 1130
Location: SANC	Complaint: MARK BRIBAKER SPRAINED HIS ANKLE WHILE WORSHIPPING.		Dispatch: -----
Officers: B. PARKINSON			Arrival: -----
Dispatcher: CM			Completed: 1200
Grid: 4	Disposition: APPLY FOUR COLD PACS TO RELEASE SWELLING.		W/O =
Offense: 804			Damage:
Disp. code: L			Recovered:
			Loss:

Spd ch

Filed by: cm

DEPOSITION INFORMATION

EXHIBIT E

109
L. KREVELKA
7M
4/6/88

MEMORANDUM

DATE: 20 MAR 1988
TO: Scott Hartley
FROM: Joe Bloom
RE: GRAND MASTER KEY

Suspecting that Scott Miller had DLB's grand master key I asked Jim Loran, who has worked closely with him for the last couple weeks, if Scott had one. He said that Scott does have DLB's grand master since he is Don's personal aid & liason. Jim did not hesitate to tell me this at all. This is a clear violation of corporate policy & the temporary restraining order issued on March 19, 1988. I then personally asked Scott & he said that he does indeed have DLB's key.

JB/cdm

March 16, 1988

To: Jack DuBois, Scott Hartley, Board of non-voting Elders
Fr: George Bowker

110
L. KRENELKA
4/6/88
YXX

My beloved Brethren,

It is my sincere belief that if I am to follow the leading of God in my life I must resign from my position as Director of Music of Community Chapel and Bible Training Center. Recent events have resulted in my ability to continue being untenable.

I believe that God has lifted His specific anointing from me to minister to what was Community Chapel. I can no longer minister in music to a church under the leadership of Don Barnett. Also, I do not believe that God has led me or anointed me to minister to the new church being formed under the leadership of the Elders. In fact, I believe I am being directed by God's Spirit not to participate in the leadership of this church.

I believe actions taken by the Elders to remove Don Barnett from office and the church was Biblical, right, and necessary. I have no regrets for participating in that action. I sincerely believe it was the leading of God to do so.

After 13 years on Staff (11 years as Music Director) I have a deep love for this people, and you, my fellow elders. I desire to remain in fellowship with you and this church. I pray that we may grow ever closer into deeper *koinonia* in the Spirit.

My resignation is effective immediately. However, I am open to negotiate my departure to assist my staff in as smooth a transition as possible.

Thank you, my friends, my yoke-fellows for your love, support, sincere friendship, and spiritual example these many years. I will always cherish our relationship and I look forward to the day we all rise to meet Him. Until then, I remain....

Your fellow-servant in Christ,


George Bowker

TO: ALL PERTINENT PARTIES
FR: ASHLEY YOUNG, AUDIO/VIDEO SUPERVISOR
DATE: 18 MAR 1988
REF: RESIGNATION

EXHIBIT III
WITNESS L. KRENDELKA
MIRREY SLYBERI YMK 4/6/88
082-1427

It is with deep regret that I write this letter. I wish that there were another way around or through the circumstances I find myself in. But after much seeking of the Lord Jesus' face, and studying many factors on both sides, I have determined the following the best course.

I am finding it impossible to carry out normal job duties under the pressure of intense authority, plus the catering to more than one Commander. My desire is to serve the Lord Jesus Christ fully, yet in the Corporation, I find that I have not the direction or appointing to do so. Again, it is with deep regret that I admit this.

Beloved ones, those of you who have loved and supported me, through times of distress and need, I grieve inwardly at the pressure that my decision may place you under. But even if the United States Supreme Court were to reinstate Donald Lee Barnett as Pastor of this church, I have determined that I can not follow him at present, as he has not been properly restored to fellowship, by the highest authority. And I do not, at present, have a direct leading of God to be in this ministry under the eldership, for reasons I am not at liberty to discuss.

I see no recourse at this time, but to quietly step aside, and let the others who feel responsibility, to take over. I have no doubt that filling my slot under Donald Lee Barnett would occur overnight, if vacated. Even though this is not the primary reason, I am officially resigning as Community Chapel Audio/Video Supervisor, as of Thursday, March 31, 1988. In the interim, I will be phasing out my responsibilities to both those over me, and potential substitutes.

If any of you feel to step into volunteer duties once assigned to you, or others in the Audio/Video department, please check with me before the end of the month. After that time, you may contact Service Ministries.

May God bless you in your pursuit of Him.

Respectfully submitted,
Ashley Young
Ashley Young (431-3182)

DEPOSITION INFORMATION

112
L. KRENELKA
4/6/88
MAY 082 1421

EXHIBIT F

1. Following is a list of employees who have already resigned and terminated as a result of the present circumstances:

Jack Hicks
Sandy Schwartzkopf
Bonnie Martin
George Bowker
Janis Myrick
Marlene Hansen
Mike Chapman

2. The following employees have submitted resignations but have not yet terminated:

Price Northcutt
Jerry Slaminski
Ashley Young
Roger Anderson

3. The following employees have resignations pending if Don Barnett remains the pastor and president of Community Chapel:

Donna Moren
Doug Burmester
Jeff McGregor
Traci Buxton
Steve Gurr
Loren Krenelka
Debra Gurr
David Motherwell
Charlotte McGaughey
Don Davis
John Bergin
Ralph Alskog
Monica Aldridge
Valerie Tavenner
Melinda Ecker
Drake Pesce
Robbie Armstrong
David Hunt
Patti Turner
Charles Kerr
Donald Lockrem
Carmen Deildal
Gwen Eldridge
Noreen Tyree
Larry Walkemeyer
Cheri O'Brien
Greg Thiel
Russell MacKenzie
Melinda Gerrard
John Koppang
Robin Ragar
Charlotte McAllister

Linda Gifford
Peggy Franklin
Patricia Albright
Irene Povolish
Mary Jane Fishler
Ron Myrick
Kevin Anderson
Ron Gerrard
Jack Osborne
Maurita Verberg
Bob White
Linda Krenelka
Cathy Moore
Connie Roberts
Angela Abele
Georgia Fontaine
Gilbert Herwig
Keith Slover
Brian Moore
Joseph Bloom
Phil Kulage
Chris Storti
Chris Mathews
Scott Hartley
John Harold
Mark Yokers
Chris Walters
Ron Lee
Kirsten Childs
Carrie Dyck
Terry Ternes
John Frost
Faye McCalmont
Debra Mathews
Martha Anderson
Stu Karlin
Julie Powell
Laurie Miller
Bev Hunley
Deborah Irwin
Louis Mensonides
Mae Gonzales
Faye Harold
David Anderson
Thomas Andren

To: General Manager
Fr: Price Northcutt
Re: Resignation
Dt: 3/14/88

113
L. KRENELKA
MX
4/6/88
661477

This letter is to announce my resignation as the manager of the Bookstore. Due to the number of specific tasks that must be learned and the decreased staff (Marlene will be disallowed this Wednesday) I would like to suggest that I stay on part-time at my present salary through April to retrain someone or to liquidate the stock. I would like to start my part-time hours (20 hrs a week) beginning March 28 and keep them until the last week in April. I feel this would give adequate time to train someone to run the bookstore or to liquidate much of the stock. It would also give time to transfer some of my duties to other departments if that was necessary.



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Pastor Donald Lee Barnett

Phone (206) 431 3100

Sanctuary located at First Avenue South and South 192nd

March 16, 1988

EXHIBIT 114 DATE 4/6/88
WITNESS L. KRENDELKA
MERILYN SEYDERT MSJ 082 1427

Dear Senior Elders:

It is with great sadness that I now submit my resignation to you, effective immediately. Because of the reinstatement of the pastor as legal president of the corporation, it has become infeasible for me to continue as a minister and elder under his direction without violating my conscience.

My desire is, and has been, to direct my energies to the furtherance of the preaching of the gospel message. I have geared the last 16 years of my life toward this end. The present circumstances do not seem to allow for this, and it appears this bottleneck could continue for years. I do not feel I can even honestly oversee the flock under my charge without undermining the pastor's position. This to me is an untenable position. It's not right, nor do I have the heart for it.

I would like to ask that consideration be given to me financially. I have no cash reserve as my support of the church has always consumed a large portion of my income, allowing no excess for personal security. If you would consider granting me a moderate severance pay along with the three weeks vacation pay that I've earned, it would be greatly appreciated.

I love all of you very much. I love my fellow elders, ministers, and staff. I especially love the youth and will pray their covering will be restored.

Sincerely in Christ,

Gerald J. Slaminski

Gerald J. Slaminski

GJS:drm

To LK.

From XE.

Re: problems in the use of the facilities

dt. 3/30/88

I'm running into a number of situations where DLB has authorized the use of a facility w/o communicating his intention thru the facilities dept. We have found out about his intended uses only bcz of rumors, and bcz of the rumors I edited the service tapes to find out the data needed to make these facilities available and ready for its intended use.

1. It appears as that there is a prayer only in room C706 on recurring Tuesday evenings that I only found out about bcz one of our dispatchers in an adjoining room complained bcz they were praying so loud.

could 1. they were distracting her, she asked if the mtg could be moved. The Facilities dept. was not even aware there was such a mtg. If the mtg. was in on the daily mtg list and neither the dispatcher nor the Sec let them in (which they didn't) then how did they get in? Do they have keys? How many weeks will this mtg continue? I'm not even sure what time the mtg begins or ends or who's leading the mtg. However we will try to accomodate them. Will also encourage the proper dismissal time so as not to have any problems w/ the alarms.

Also this mtg has been, and will be, conducted w/ any ventilation or heat.

2. I understand from Ron Myrick that we had a problem this past weekend with the Sunday school classes. I had talked to Ken the Ther prior and he informed me that he had communicated w/ DB and things were at least workable.

2. We discussed the rooms that would be used & the ones that had been cancelled. It appears as though DLB had his own party on Friday night following service and appointed his own SS. teachers to handle some classes. I understand that someone w/ a key on Sunday morning started opening doors till they found an empty room and then proceeded to conduct their own SS. class per DLB's instruction. They also commandeered some of the SS manuals out of the SS office (E206) for their class. This caused a conflict with the utilization of the room & the equip, which ended in a confrontation btwn Ron Myrick & Scott Miller. Also there was no ventilation or heat scheduled for that room which by-the-way, had no windows either (5119). I haven't heard there was any problem, however I wouldn't want the situation to recur. That is the conflict problem or the ventilation problem.

2/13/15

3 There was a conflict w/ a Wednesday Night Mtg. in the Chapel on 3/30. I heard on a tape of our staff mtg on Tuesday 3/22 after the mtg had ended DLB said there was going to be a mtg where he was going to answer questions "on most Wed evening". So we made the Chapel available for the following evening and no one showed up. Then we found out thru a letter DLB had sent to the homes of those in the church that he had extended it for the following Wednesday. So once again we cancelled the regular mtg and made the Chapel available for DLB's mtg. This incident was different in that Wednesday morning 3/30 Scott Miller did call in in effort to book the Chapel for the mtg. Had we not done our investigative home-work and or intercepting the grapevine of rumors his request would have left this dept scrambling in an effort to accomodate their needs with such short notice.

These situations I've described have been some of the more significant ones. There are many more that occur quite frequently mostly during periods of time and mostly involving security unlocks only. But even these insignificant occurrences have resulted in rooms being left unlocked and empty, furniture being moved and not replaced, desks being damaged thru, lights being left on, and rooms being used w/o heat or ventilation. So insignificant as they may seem they pose their own group of problems, and when compounded one by another on any given day the situation becomes frustrating. This lack of communication when trying to run two camps each wanting to do their own thing and with little if any concurrence is difficult at best.

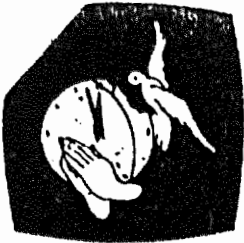
Sincerely, trying to hold it together

Joe Ferrara

DEPOSITION INFORMATION

EXHIBIT G

116
L. KRENELKA
TAX
4/6/88



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

March 13, 1988

Donald Lee Barnett
416 S.W. 192nd
Seattle, WA 98166

Dear Don,

We, the undersigned employees of Community Chapel & Bible Training Center, are deeply grateful for the scrupulous care and tireless labors that the eldership has had in discerning and implementing the Word of God these past several weeks. We are one heart and one mind with their actions to remove you, Donald L. Barnett, from office as Pastor and disfellowshipping you from this church.

Since the sole purpose of the corporate structure of Community Chapel & Bible Training Center is the life and function of the church ministry of the Gospel of Jesus Christ, the office of Pastor can in no way be fully separate from any other corporate office that you may have held prior to March 3, 1988. In addition, the scriptural framework for church government as well as the bylaws of this corporation prohibit a disfellowshipped person from functioning in any capacity, whether it be defined by church or corporation strictures.

Accordingly, we do not consider you our employer any longer, and will so function in our respective jobs and ministries. We consider the Senior Elders (Scott Hartley, Jack Hicks, and Jack DuBois) to be the senior leadership of this church, and therefore our corporation employer.

We all still love you deeply,



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

David McPherson

Charlotte McLaughrey

Donald P. Clark

John Berger

Ralph Alskog

Douglas R. Burnett

Monica Aldridge

Talene O. Tavernier

Melinda Ecker

Arake R. Pasce



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3199

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

Steven R. Gurr 3-13-88

Robbie A. Armstrong 3-13-88

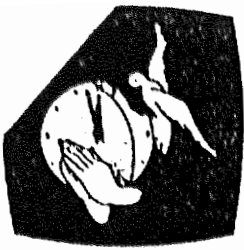
David W. Hunt 3-13-88

Billy A. Turner 3/13/88

Debra P. Gurr 3/13/88

Michael C. Cannon 3/14/88

© Hal & Kell 3-14-88



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

Gerald J. Slaminich

ELDER

Donald C. Johnson

ELDER

Wyomen J. Swales

Robert Williams

ELDER

Joan Zienelka

Carmen Deildal

Lucretia D. Edridge

Joseph Kyle

Larry J. Walkemeyer

MINISTER

Cheri S. O'Brien



Community Chapel & Bible Training Center

186.15 8th Avenue South, Seattle, Washington 98148

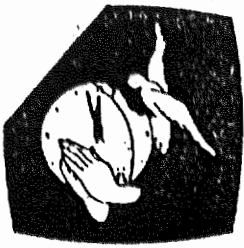
Phone (206) 441-1100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

Jack A. Hicks	SR. ELDER
Gary B. Burt	ELDER
John Bergin	
Gary A. Burt	ELDER
Gregory R. Thiel	ELDER
Al MacKenzie	Elder
Melinda Leonard	
J. L. P. Koppang	
Robin P. Edgar	
Charlotte McAllister	
Linda Dufford	
Peggy Franklin	
Jacqueline Allright	
Irene Povolisho	
MaryJane Fisker	
Ronald D. Myrland	Elder



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3100

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

[Signature]

J. H. Bois SR. ELDER

Erskott Hartley SR. ELDER

John L. Harold ELDER

Mark A. Yobers ELDER

Chris Walters

Ron Lee

Kristen Childs

Carrie Ryck

Jerry Jensen

John F. Frost II



Community Chapel & Bible Training Center

10615 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3109

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

Devin Anderson
Thomas Anderson

Jack Blaine

Maurita Verburg

Bob White

Linda Grenelba

Sathy Moore

Tom Anderson

Connie Roberts

Angela Ly Bell

Ashley Young

Georgia Fountain

Gilbert Berg

Keith Sloan

Paul F. Wright

Brian Moore

Joseph L. Boom

Philip Kulager

C. L. Flork

TO: DONALD L. BARNETT

Date: 3/13/88

FROM: CAROL D. MISTEREK

IF RESPONSE REQUESTED, BY: _____
date

SUBJECT: MEETING OF 3/14/88 9A.M.

In lieu of the current situation I will be unable to attend any staff meetings called unless by my immediate supervisors' request, as I am under their employment at this present time. THANK YOU.



Community Chapel & Bible Training Center

18635 8th Avenue South, Seattle, Washington 98148

Phone (206) 431-3109

Pastor Donald Lee Barnett

Sanctuary located at First Avenue South and South 192nd

Signatures of Community Chapel & Bible Training Center employees, for attached letter dated March 13, 1988, to Donald L. Barnett:

Jay Mc Cormick

Delna Matthews

Martha Anderson

Her Kain

Julie Powell

Gavin Miller

Fred McGee

Beverly Hunsley

General of Quinn

Louis Meadows

Mae Brasfield

Ray Hurd

Donald Johnson

117
4/6/88
L. KRENELKA
Mx

56/22.0
8803-01

IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

IN RE COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER, a non-profit) NO. 88-2-05272-7
corporation organized under the)
laws of the State of Washington.) SUBPOENA DUCES TECUM
PURSUANT TO CR 30(b)(6)

THE STATE OF WASHINGTON, to: Loren Krenelka

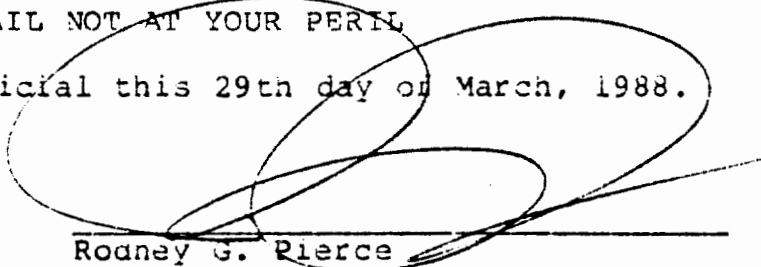
GREETINGS:

YOU ARE HEREBY COMMANDED to be and appear at the offices of
Rodney G. Pierce, The Duncan Building, 315 Second Avenue South,
Seattle, Washington, on the 6th day of April, 1988 at the hour of
2:00 o'clock p.m., then and there to testify as a witness at the
request of the plaintiff in the above entitled cause, to remain in
attendance upon the undersigned or other Notary Pubic until
discharged and bring the following documents:

All items listed on attached Appendix "A" made
a part hereto.

HEREIN FAIL NOT AT YOUR PERIL

WITNESS my hand and official this 29th day of March, 1988.



Rodney G. Pierce
Attorney for Plaintiff

APPENDIX "A"

Preliminary Definitions:

1
2
3 1. "Documents" shall include any and all originals and copies of
4 documents as defined on the attachment hereto, in the possession
5 or under the control of the responding party, their attorneys,
6 employees or agents.

7 2. "Petition" shall mean the Petition for Dissolution of
8 Non-Profit Corporation and for Appointment of Receiver dated
9 March 21, 1988.

10 3. "Community Chapel" shall mean the Community Chapel and Bible
11 Training Center.

12 4. "Board" shall mean the Board of Senior Elders of the Community
13 Chapel.

14 1. Documents relating in any manner to any deadlock in management
15 as alleged in the Petition at page 2, line 9.

16 2. Documents relating in any manner to the deficit, as alleged in
17 the Petition at page 2, line 12.

18 3. Documents relating in any manner to the decisions relating to
19 reduction in personnel and programs which must be made, as alleged
20 in the Petition at page 2, lines 12-13.

21 4. Documents relating in any manner to an agreement, lack of
22 agreement, communication, conference or any other activity
23 relating in any manner to "what reductions should be made or how
24 those decisions should be reached," as alleged in the Petition at
25 page 2, lines 13-15.

5. Documents relating in any manner to any request by Barnett
that persons in the congregation give him money which exasperated
"this problem," as alleged in the Petition at page 2, lines 16-19.

6. Documents relating in any manner to strong disagreement between
Petitioners and Barnett as to how pending civil suits should
be handled, as alleged in the Petition at page 2, lines 20-23.

7. Documents relating in any manner to employees of the corporation
being unwilling or expressing unwillingness to take
directions from Barnett, as alleged in the Petition at page 3,
lines 1-5.

- 1 8. Documents relating in any manner to an obvious management
2 problem by Barnett being restrained from terminating employees,
except with the concurrence of Petitioners, as alleged in the
Petition at page 3, lines 6-8.
- 3 9. Documents relating in any manner to attempts to get agreement
4 with Barnett regarding the appointment of a successor registered
agent and failure in that attempt, as alleged in the Petition at
page 3, lines 9-11.
- 5 10. Documents relating in any manner to worship services led by
6 Senior Elders drawing more people than the regular room holds, as
7 alleged in the Petition at page 3, lines 12-14.
- 8 11. Documents relating in any manner to services led by Barnett
9 having much poorer attendance in the large sanctuary, as alleged in
the Petition at page 3, lines 15-16.
- 10 12. Documents relating in any manner to Barnett's refusal to move
his services to the small sanctuary, as alleged in the Petition at
page 3, lines 16-17.
- 11 13. Documents relating to any memo issued by Barnett to
12 Petitioners which threatened them with legal action and dismissal
for their failure to cooperate which created an intolerable work
13 environment as alleged in the Petition at page 3, lines 18-19.
- 14 14. Documents relating in any manner to any type of investigation
of Barnett or any other past or present employees of Community
15 Chapel and Bible Training Center during 1987 or 1988.
- 16 15. Documents, including tape recordings, relating in any manner
to worship services by Senior Elders during the year 1988 up to
17 the present.
- 18 16. Documents, including tape recordings, relating in any manner
to any and all Senior Elders' meetings during 1987 and 1988.
- 19 17. Documents, including tape recordings, relating in any manner
20 to any and all Elders meetings during 1987 and 1988.
- 21 18. Documents relating in any manner to Barnett providing the
"Grand Master" key to a person who is not an employee of the cor-
22 poration, against the terms of the restraining order and bylaws,
which threatens the security of the files and records of the cor-
23 poration, as alleged in the Petition at page 3, line 21 and
page 4, line 2.
- 24 19. Documents relating in any manner to the financial status of
25 the corporation deteriorating, as alleged in the Petition at page 4,
lines 6-7.

1 20. Documents relating in any manner to a deadlock in management
2 leading to a breakdown of employee morale which has led to
3 resignations of key employees and will result in more resignations,
4 as alleged in the Petition at page 4, lines 8-10.

5 21. Documents relating in any manner to the failure to resolve
6 differences as resulting in decreased participation in services
7 with a resultant decrease in church income, as alleged in the
8 Petition at page 4, lines 11-13.

9 22. Documents relating in any manner to 90% of the congregation
10 following the Senior Elders being able to support the current
11 program, as alleged in the Petition at page 4, lines 14-15.

12 23. Documents relating in any manner to 10% of the congregation
13 following the Senior Elders not supporting any program managed by
14 Donald W. Barnett, as alleged in the Petition at page 4, lines
15 14-15.

16 24. Documents relating in any manner to giving to the Church,
17 while there has been split services, being down 47% from budget, as
18 alleged in the Affidavit of Drake Pesce.

19 25. Documents relating in any manner to review by Drake Pesce of
20 financial records from the Church for the purposes of expressing
21 any type of opinion or statement of fact, as set out in the
22 Affidavit of Drake Pesce.

23 26. Documents relating in any manner to attendance at meetings at
24 Community Chapel for the period from July 1, 1987 to the present.

25 27. Documents relating in any manner to determination of atten-
26 dance at meetings as alleged in the Affidavit of Loren Kreneika.

27 28. Documents relating in any manner to the Donald Barnett orders
28 or directions to the Board, as alleged in the Affidavit of Scott
29 Hartley at page 1, lines 18-20.

30 29. Documents relating in any manner to any meeting of Senior
31 Elders on Friday, March 18, 1988, as alleged in the Affidavit of
32 Scott Hartley, page 1, lines 14-15.

33 30. Documents relating in any manner to the number of Deacons
34 being below the number required to act, as alleged in the Affidavit
35 of Scott Hartley at page 1, lines 20-21.

36 31. Documents relating in any manner to a vote of the congregation
37 to elect new deacon board members, as alleged in the Affidavit of
38 Scott Hartley at page 1, lines 21-22.

1 32. Documents relating in any manner to the impossibility to elect
2 new members to the Deacon Board because the congregation is split
into two services, as alleged in the Affidavit of Scott Hartley at
page 1, lines 22½-23½.

3 33. Documents relating in any manner to a memorandum by Donald
4 Barnett threatening to take civil action and threatening to ter-
5 minate officers and staff if they do not perform to his satisfac-
tion, as alleged in the Affidavit of Scott Hartley at page 1,
line 24½ - page 2, line 1.

6 34. Documents relating in any manner to a letter signed by 95% of
7 the staff that they will not take directions from Donald Barnett,
as alleged in the Affidavit of Scott Hartley at page 2, lines 3-5.

8 35. Documents relating in any manner to Donald Barnett's assump-
9 tion of the position of general manager of the corporation as
alleged in the Affidavit of Scott Hartley at page 2, lines 6-7.

10 36. Documents relating in any manner to no substantial corporate
11 activity being or capable of being accomplished without coopera-
12 tion of the staff with the general manager, as alleged in the
Affidavit of Scott Hartley at page 2, lines 7-9.

13 37. Documents relating in any manner to any type of communication,
14 correspondence, memorandum or other documents or directions from
Donald Barnett to any officer or employee of Community Chapel and
Bible Training Center from January 1, 1988 to the present.

15 38. Documents relating in any manner to the preparation, review,
16 execution or delivery of the March 13, 1988 letter attached to the
Affidavit of Scott Hartley.

17 39. Any and all financial records and documents for Community
18 Chapel and Bible Training Center from January 1, 1987 to the pre-
sent, except as otherwise requested, including but not limited to:

- 19 a. Financial Statements, yearly and monthly;
20 b. Corporate Tax Returns (1976 to the present);
21 c. Cash Flow Statements;
22 d. All budgets and subsidiary documents;
23 e. All pro forma documents and financial projections;
24 f. All amortization schedules;
25 g. All schedules for payment of liabilities;

h. All documents provided to any bank; and

i. Check registers and disbursement records (from January 1, 1988 to present).

40. Documents relating to any profit or non-profit corporation incorporated or to be incorporated in 1988 by any past or present officer or employee of Community Chapel or by any person on their behalf.

86/23.0
8803-01

DEFINITION ATTACHMENT TO DISPOSITIONAL AGREEMENTS

"Document" means all written, printed, typed, punched, traced, filmed or graphic matter, however produced or reproduced, of every kind and description, now or hereafter in your actual or constructive possession, custody, trust, care or control, including but not limited to any correspondence (including letters, cables, telegrams, TWSs, and telexes); memoranda and notes, memoranda of conversations, conferences or telephone conversations; reports, data compilations or analyses; logs and records; micrographs; books; papers; manuals; handbooks; bulletins; advisories; messages; magazines; periodicals; film strips or movies; press releases; newspaper clippings; pamphlets; studies; notations; working papers; charts; maps; plans; drawings; diagrams; computer printouts; indexes; minutes; transcripts; contracts; agreements; leases; legal pleadings; invoices; billings; statements; accounting books or records; financial data of any kind; journals; ledgers; diaries; tax returns; bylaws; rules; regulations; constitutions; annual reports; programs; certifications; resolutions; any electronic or other recordings of any kind or nature and any mechanical or electronic sound recordings or transcripts thereof, however produced or reproduced; and all copies or facsimiles of documents by whatever means made.

"Person" or "persons" means all entities, including, without limiting the generality of the foregoing, all individuals, associations, companies, partnerships, joint ventures, corporations, trusts or estate, public agencies, departments, bureaus, commissions and boards.

MARCH '88

118

MARCH						
S	M	T	W	T	F	S
	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

L. KREVELKA
MAY

7 MONDAY

11:00 HOURS

2-3 B
3-4 B
4-5 B

8 TUESDAY

9:00-10:00
10:00-11:00

12:00-1:00
1:00-2:00

9 WEDNESDAY

LUNCH 12:00-1:00

APRIL						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	1	2	3	4	5

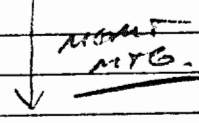
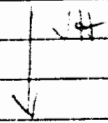
"I dislike arguments of any kind
They are always vulgar, and often
convincing."

— OSCAR WILDE

T THURSDAY 10

POLICE

FREE



South - 10:00

10-7 1000

FRIDAY 11

11:00

W/C 395 OLB

E/C 582 EDDERS

SERVICE @ BOTH CAMPUS

WORK TILL 12:00 PM

SATURDAY 12

SUNAM W/C 140

E/C 625

7:00 AM TILL 5:00 PM W/C 295

12:00 MID

WORK

BOTH SERVICES

W/C MTG.

SUNDAY 13

MARCH '88

MARCH

S	M	T	W	T	F	S
	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

14 MONDAY

9:00 - 5:00 H.C.
 9:00 DUB MTG.
 10-11 SH
 12:00 RANDY

15 TUESDAY P

12-13 SH

16 WEDNESDAY

9-10 - GH

APRIL

S	M	T	W	T	F	S
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

"The reason American cities are green prosperous is that there is no place to sit down."

- A.J. TALLEY

THURSDAY 17

St. Patrick's Day

10:00
 ↓ DENTIST
 free
 ↓

Scout - hats
 10-7 - 6:30

FRIDAY 18

~~off
 w/c 254
 E/C 550~~

SATURDAY 19

SUN AM W/C 168
 E/C 288

SUNDAY 20

SUN PM W/C 276
 E/C 513

MARCH '88

MARCH						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
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20	21	22	23	24	25	26
27	28	29	30	31		

21 MONDAY

~~off~~

22 TUESDAY

9-10 - 322 KO
10-11 614
E. J. ...
351177 ...

23 WEDNESDAY

9:00 MAURITIA
2:00 JIM B. ...

APRIL

S	M	T	W	T	F	S
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

"The best way to keep a home is to make the home atmosphere pleasant — and let the car out of the tires."

— DOROTHY PARKER

THURSDAY 24

Free
1:00 RUBY'S NITE. STUDIO
↓

Scout - late 8:30 - 6:06
No concert

T FRIDAY 25

BANK 3 - 325
10-1 JIM B - 637
SCOTT J...
JIM LEECH
10-7 - 612

SATURDAY 26

-265
-550
-235
-584

SUNDAY 27
Palm Sunday

WORK 1-7 8-10-12-1
6 2 1

MARCH '88

MARCH						
S	M	T	W	T	F	S
6	7	8	9	10	11	12
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27	28	29	30	31		

28 MONDAY

10-8 7:00 AM 1-2 10:00 AM
10-11 7:00 AM 2-3 10:00 AM

29 TUESDAY

10-8 9:30 AM 10-7 7:00 AM 10:00 AM

30 WEDNESDAY

10-10 6:00 AM

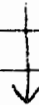
APRIL

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"There is no difference between worldly and heavenly wisdom. For religion consecrates daily life."
— JOHN LUBBOCK

P THURSDAY 31

9:30-11:00 AM 10:00 AM Free



School - late 10:30-6:30

APRIL

FRIDAY 1
Good Friday

10-11 10:00 AM

SATURDAY 2
First Day of Passover

10-11 10:00 AM

SUNDAY 3
Easter Sunday

APRIL '88

APRIL						
S	M	T	W	T	F	S
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30						

4 MONDAY

PTL Day

5 TUESDAY

CALL SCOTT

6 WEDNESDAY

2:00 DEPOSITION

MAY

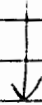
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29	30	31				

"The battle of the sexes is sometimes won by the man's resistance, but more often by the woman's persistence."

— ANONYMOUS

THURSDAY 7

Eric



Scout-Date

FRIDAY 8

Dr. J.

Dr. J.

SATURDAY 9

SUNDAY 10

Orthodox Easter

APRIL '88

APRIL						
S	M	T	W	T	F	S
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11 MONDAY T

1-2 SG
10-11 SG

12 TUESDAY

10-11 SG

13 WEDNESDAY

10-11 SG

MAY						
S	M	T	W	T	F	S
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29	30	31				

"Modern man... has not ceased to be credulous... the need to believe haunts him."

— WILLIAM JAMES

THURSDAY 14

1-2 SG
10-11 SG

P FRIDAY 15

10-11 SG

SATURDAY 16

10-11 SG

SUNDAY 17

APRIL '88

APRIL

S	M	T	W	T	F	S
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21	22	23	24	25	26	27
28	29	30				

18 MONDAY

Patriot's Day (MA, ME)

10-11-86

2-3-88

19 TUESDAY

9-10-88

11-12-88

20 WEDNESDAY

9-10-88

MAY

S	M	T	W	T	F	S
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29	30	31				

"The typical liberal-arts college . . . merely offers a smorgasbord of courses"

— JOHN FISCHER

THURSDAY 21

11-12
↓

Scout - Date

FRIDAY 22

SATURDAY 23

SUNDAY 24

APRIL '88

APRIL						
S	M	T	W	T	F	S
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24	25	26	27	28	29	30

25 MONDAY T

10-11 SH

1-2 2:40

3-4 1:15

26 TUESDAY

9:10-10:10

Phonics

27 WEDNESDAY

Secretaries Day

10-11 SH

12-13 1:15-2:15

MAY						
S	M	T	W	T	F	S
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29	30	31				

"Only a person who can live with himself can enjoy the gift of leisure."
— HENRY GREER

THURSDAY 28

9:30-11:00

11-12 SH

↓

Securities Date

P FRIDAY 29

10-11 SH

SATURDAY 30

MAY SUNDAY 1

MAY '88

MAY						
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29	30	31				

2 MONDAY Dan's Bday

10-11 St 12-15

3 TUESDAY

12-15

16-18

4 WEDNESDAY

19-21

JUNE

S	M	T	W	T	F	S
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29	30	1	2	3	4	5

"There is no such thing as a non-working mother."

— HESTER MUNDIS

THURSDAY 5

10-11 St 12-15
↓ 14
↓
16-18

FRIDAY 6

SATURDAY 7

SUNDAY 8
Mother's Day

MAY '88

MAY						
S	M	T	W	T	F	S
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15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

9 MONDAY

10 TUESDAY T

11 WEDNESDAY

JUNE

S	M	T	W	T	F	S
5	6	7	8	9	10	11
12	13	14	15	16	17	18
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"There is a sufficiency in the world for man's need, but not for man's greed."

— MOHANDAS K. GANDHI

Reddy's Day

THURSDAY 12

P FRIDAY 13

Fast Days

SATURDAY 14

Basin Day

SUNDAY 15

119
4/6/88
L. KRENELKA
TMJ

MEMORANDUM

3/17/88

FROM: DONALD BARNETT, PRESIDENT

TO: LOREN KRENELKA, SERVICE MINISTRIES

RE: DUPLICATION AND CHECK OUT OF TAPES FROM WEST CAMPUS SERVICES

I HAVE BEEN INFORMED THAT THE TAPES FROM LAST WEEKEND'S SERVICES AT THE WEST CAMPUS ARE NOT AVAILABLE FOR CHECKOUT AT THE TAPE CHECKOUT LIBRARY ON EAST CAMPUS.

*West campus
service tapes
can be checked
out at West
Campus &
East campus
service tapes
will be given
out at east campus
the individual
church members
can visit which
ever tapes they
want to
bring to the
campus they
prefer.*

AS THE PRESIDENT OF THE CORPORATION, PER THE RESTRAINING ORDER DATED 3/15/88 FROM JUDGE BATES, AND PER THE STATUS QUO THAT EXISTED AS OF MARCH 3RD, 1988, I AM REQUESTING THAT ALL TAPES FROM SERVICES HELD ON MARCH 11TH AND 13TH, ON THE WEST CAMPUS, ARE DUPLICATED AND MADE AVAILABLE FOR CHECKOUT IMMEDIATELY. ALL FUTURE SERVICE TAPES FROM WEST CAMPUS SERVICES WILL BE DUPLICATED AND HANDLED AS WAS DONE PRIOR TO MARCH 4TH, THAT IS, DUPLICATED AND MADE AVAILABLE FOR CHECK OUT AT BOTH THE WEST CAMPUS ON SUNDAY AND THE TAPE CHECKOUT LIBRARY DURING THE WEEK. THE TAPES FROM MY SERVICES SHOULD BE AVAILABLE TO ALL MEMBERS OF BODY AT ALL REGULAR CHECKOUT TIMES AT BOTH CAMPUSES.

IN ADDITION, SEEING AT SOME SOUND BOOTH, DUPLICATION, AND RECORDING VOLUNTEERS HAVE LEFT, I AM APPOINTING JEFF BECKER IN CHARGE OF ALL THESE MINISTRIES AT THE WEST CAMPUS IMMEDIATELY.

I WOULD REMIND YOU THAT FAILURE TO COMPLY WITH THIS REQUEST IS VIOLATION OF CORPORATE BY-LAWS, CIVIL LAW, AND YOUR EMPLOYMENT CONTRACT.

THANK YOU FOR YOUR COOPERATION IN IN THIS MATTER.

SIGNED Donald Lee Barnett

*Jeff Becker has been assigned to Ashley Young
to work as his volunteer helper at West
Campus.*

120

4/6/88

L. KRENELKA
MX

MEMORANDUM

DATE: 3/15/88

TO: LOREN KRENELKA, SERVICE MINISTRIES

FROM: DONALD BARNETT, PRESIDENT

*What happened
is usually
accomplished
by procedure*

IT IS MY INFORMATION THAT YOU HAVE CHANGED YOUR OFFICE LOCKS SO THAT THE GRAND MASTER KEY CANNOT OPEN THE DOORS. YOU ARE ORDERED TO IMMEDIATELY RETURN ALL LOCKS SO THAT THE GRAND MASTER KEY WILL FIT ALL THE LOCKS AS BEFORE.

YOU ARE ALSO TO PUT JIM LORAN ON DUTY AS A SECURITY OFFICER, AS OF 5PM, MARCH 18TH, AND TAKE STEPS TO PREVENT FURTHER OCCURRENCE OF DAMAGE AS OCCURRED LAST WEEKEND AT THE SANCTUARY DUE TO LACK OF EXTRA SECURITY.

*volunteer
understand
- Jim*

NO OTHER UNUSUAL OR NON-NORMAL CHANGES SHALL BE MADE WITHOUT MY CONCURRENCE. DO NOTHING DIFFERENT THAN IF YOU FULLY ACCEPTED ME AS YOUR PASTOR AND CORPORATION PRESIDENT.

*will not
do.*

FINALLY, YOU ARE TO RESTORE MY PHONE LINES TO THE PARSONAGE, EXTENSIONS 170 AND 171, EFFECTIVE IMMEDIATELY.

*will be cancelled
by letter from
Senior Elders*

SIGNED Donald Lee Barnett

DATE 3/18/88