

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR THE COUNTY OF KING

DONALD L. BARNETT,

Plaintiff,

NO. 88-2-04148-2

v.

DECLARATION OF DONALD BARNETT

JACK A. HICKS, et al.

Defendant.

I am the plaintiff in the above action and I am making this declaration in support of the Motion For Reconsideration.

By separate attachment entitled Bylaws of Community Chapel.

I have attached my copies of the Bylaws, from the originals in 1967

up until the most recent revision on April 6, 1988.

The directors of the corporation have provided the and order and power for the Pastor and President of the corporation subject the Bylaws over a number of years and on a continuing basis.

Prior to March 4, 1988 notice of meetings of the sourd of Directors was always provided to the directors. On March 4, 1988, the three defendants came to my residence, the parsonage, by surprise and without notice of any intent to have any type of meeting of the Board of Directors. I indicated that I had wanted to speak with them individually about our individual relationships. I said I would talk to them about my matters that I was not intending to discuss the matters that they intended to bring up.

DECLARATION OF DONALD BARNETT -

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When they refused to cooperate and answer my questions, I saw that nothing could be gained from further discussions and I asked them to leave. There never was any mention of amending the Articles or Bylaws. There was no indication made at that time that this was to be considered a meeting of the Board of Directors. No indication was made that this gathering was to be adjourned to a later time or place. There simply was no discussion of anything that these individuals or the Board of Directors was going to do in the future.

I have over a number of years relied upon the representations of the defendants that I did have the authority that had been provided to me. In fact, I deeded my house (the present parsonage) to Community Chapel based upon the representations that I would be able to reside in the Parsonage as the Pastor and that I would be the Pastor. My equity in that house was transferred to Community Chapel. I gave up any interest in any other work to act as the Pastor of Community Chapel. There is no other livelihood that I have and I have not pursued any other careers based upon the fact that I was to have the authority as the Pastor and to represent the members of the congregation as their Pastor in the future.

These defendants have consistently executed Bylaws giving me authority over the religious areas of Community Chapel. This included my various positions involving the Bible College, the Church, the Christian School, etc.

DECLARATION OF DONALD BARNETT -

The defendants have a difference in religious principles from myself and other members. If there was not a difference, there would not have been any action by taken by the defendants in this litigation.

The defendants Hartley and DuBois would benefit from my removal because they would be able to espouse religious principles that are contrary to the principles of myself and members of the congregation.

Pursuant to the Bylaws, I have had one independent power and that is to adjust the salaries of employees. Any control over the defendants' salaries would be removed by the actions of the defendants.

I declare at Seattle, Washington on the below date under penalty and perjury in the laws of the State of Washington that the foregoing is true and correct.

DATED: November 29, 1988.

DONALD BARNETT