

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND
FAMILY DIVISION

DEBORAH ANN FRAZIER,

Plaintiff,

Hon. Karen McDonald

Case No: 2010-773215-DM

vs.

RICKY ALAN FRAZIER,

Defendant.

/

VIDEOTAPED DEPOSITION OF DAVID E. TAYLOR, A/K/A THE APOSTLE

Taken by the Defendant at law offices of Colleen V.
Ronayne, located at 2055 Orchard Lake Road, Sylvan Lake,
Michigan 48320, on Tuesday, February 10, 2015, commencing at
10:00 a.m.

APPEARANCES:

For the Defendant: COLLEEN V. RONAYNE (P33560)
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For Third-Party DAVID W. POTTS (P19043)

Witness: 21 E. Long Lake Road, Suite 250
Bloomfield Hills, Michigan 48304

1 APPEARANCES (Continued):
 2 Also Present: Rick Frazier
 3 VIDEOGRAPHER: VIDEO ENTERPRISES, INC.
 4 RECORDED BY: REGENCY COURT REPORTING
 3133 Union Lake Road, Ste. A
 5 Commerce Township, MI 48382
 (248) 360-2145
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1 Sylvan Lake, Michigan
 2 Tuesday, February 10, 2015 - 10:41 a.m.
 3 *****
 4 VIDEOGRAPHER: We are now on the
 5 record. This is the videotaped deposition of David
 6 E. Taylor, a/k/a The Apostle. Today's date is
 7 February, 10th, 2015. The time is now 10:41 a.m. My
 8 name is Nick Houselander, I'm the video technician.
 9 This deposition is being taken at 2055
 10 Orchard Lake Road, Sylvan Lake, Michigan, 48320 in
 11 the case of Deborah Ann Frazier v. Ricky Alan
 12 Frazier, Case No: 2010-773215-DM in the Oakland
 13 County Family Division. Could the attorneys please
 14 briefly identify themselves for the record.
 15 MS. RONAYNE: Go ahead.
 16 MR. POTTS: Sure. I'm Dave Potts, I
 17 represent the witness, Dave Taylor, and these are my
 18 own clients.
 19 MS. RONAYNE: Colleen Ronayne
 20 appearing on behalf of Rick Frazier who is to my
 21 left.
 22 MR. YATOOMA: Gregory Yatooma, also
 23 representing Rick Frazier.
 24 VIDEOGRAPHER: Can the court reporter
 25 please swear in the witness.

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1 COURT REPORTER: Could I have you
 2 raise your right hand, sir. Do you solemnly swear or
 3 affirm to tell the truth, the whole truth and nothing
 4 but the truth, so help you God?
 5 MR. TAYLOR: Yes.
 6 COURT REPORTER: Thank you.
 7 MR. POTTS: I have a preliminary
 8 matter.
 9 MS. RONAYNE: Sure.
 10 MR. POTTS: If I could just make a
 11 statement. The Court rendered an opinion and order
 12 regarding a motion dealing with the question of
 13 privilege that was raised during the November 12th
 14 deposition. The Court entered an order on January
 15 28th requiring that the matter be held in the
 16 courthouse. Pursuant to agreement of counsel and
 17 pursuant to notice, the deposition is being held in
 18 Plaintiff's counsel's office, certainly with my
 19 permission and with my concurrence. But just so that
 20 the record is correct, this is an agreed upon
 21 relocation of the venue and we've -- we've done this
 22 by consent.
 23 MS. RONAYNE: That is correct,
 24 although if we run into a problem I reserve the right
 25 to have it relocated to the courthouse. Do you

1 understand? You're in agreement with that?
 2 MR. POTTS: Yes.
 3 MS. RONAYNE: Okay. And that we've
 4 agreed that we are going to rather liberally just get
 5 this deposition done, and I understand that we're
 6 going to adhere to the opinion which may be on a
 7 question by question basis when it comes to spiritual
 8 matters, but in a cooperative way, and if necessary
 9 we'll seek the guidance of the Court.
 10 MR. POTTS: Yes. It's my intention
 11 to try and live within the scope of the opinion. I
 12 read it. We've had an opportunity to discuss it.
 13 It's clear that the Court's trying to give us some
 14 direction and guidance but it may be that on a case
 15 to case basis we'll have to see where we go. But
 16 it's my intention to be more cooperative than less,
 17 and to try to reason as expansively but as narrowly
 18 as I can, that makes a quandary, but --
 19 MS. RONAYNE: Okay.
 20 MR. POTTS: -- I think we know each
 21 other well enough that we're not going to --
 22 MS. RONAYNE: Okay.
 23 MR. POTTS: -- fight when we don't
 24 have to have one.
 25 MS. RONAYNE: Exactly. Okay.

1 Mr. Taylor, you were here for a
 2 deposition -- what was the date of --
 3 MR. POTTS: The 12th.
 4 MS. RONAYNE: What was it?
 5 MR. POTTS: November 12th.
 6 MS. RONAYNE: -- November 12th.
 7 THE WITNESS: Mm-hmm. Sure.
 8 MS. RONAYNE: And we ran out of time
 9 and rescheduled it for today, ultimately through
 10 court order, and I'd like to clear up a couple of the
 11 things that you said at the November 12th deposition.
 12 THE WITNESS: Okay.
 13 MS. RONAYNE: Okay.
 14 DAVID E. TAYLOR
 15 SWORN AS WITNESS, TESTIFIED AS FOLLOWS:
 16 DIRECT EXAMINATION
 17 BY MS. RONAYNE:
 18 Q Who lives with you at 2008 Victory Lane?
 19 A No one.
 20 Q No one lives with you there?
 21 A No. Other than my son.
 22 Q Well, I mean, he counts.
 23 A Okay. Yeah.
 24 Q Whoever the human being is.
 25 A Yes, my son.

1 Q And who's your son?
 2 A Joshua Taylor.
 3 Q And what's his date of birth?
 4 A The 12th, the 21st, and it's 2000.
 5 Q And --
 6 A I mean, 1999. I'm sorry.
 7 Q And who is his mother?
 8 A Tabitha Taylor.
 9 Q Now, you have older children; is that right?
 10 A No.
 11 Q You live with --
 12 A Oh, yeah. Oh, yeah, my daughter Destiny Taylor.
 13 Q And her mother is Tabitha?
 14 A Mm-hmm.
 15 Q You have to answer yes or no.
 16 A Yes, mm-hmm.
 17 Q Okay. So you've had full custody of Joshua?
 18 A We have joint -- well, I think they give her the --
 19 what -- what do the courts say if you got them --
 20 custodial custody where -- I don't know the
 21 terminology for it, but I know that I have -- she
 22 keeps them half of the week and then I keep them.
 23 Q When you say "them," who are you referring to?
 24 A Joshua and Destiny.
 25 Q Is Destiny an adult?

1 A Yeah. Now, she is -- she just turned 18 this coming
 2 January.
 3 Q Okay. So is Tabitha Taylor the primary custodian --
 4 A Yes.
 5 Q -- of the children?
 6 A Is that the terminology?
 7 Q No, I'm supplying some. I don't know what it --
 8 A Yeah.
 9 Q -- where you got divorced and what language they use.
 10 A Yeah, that's right.
 11 Q But you believe you have 50/50 parenting time?
 12 A Yes.
 13 Q And you pay support?
 14 A Yes, mm-hmm.
 15 Q How much do you pay?
 16 A Seven fifty a month.
 17 Q A month?
 18 A Mm-hmm.
 19 Q Okay. You indicated that when you're in St. Louis
 20 you sleep at two houses, two different places. One
 21 is the Victory Lane that you rent, that's a rental?
 22 A Mm-hmm.
 23 Q You have to answer yes.
 24 A Yes, mm-hmm.
 25 Q Okay. And one was where JMMI rents at -- I'm not

1 sure how to pronounce the name of the street --
 2 Timpaige?
 3 A Yeah. Timpaige.
 4 Q Timpaige?
 5 A Mm-hmm.
 6 Q How much time do you spend at one versus the other?
 7 A I'm not sure. I know that we just, you know, the
 8 ministry just acquired that ministry residence now a
 9 little over a year, and so we were preparing things
 10 over there so I spent more time this past little year
 11 of helping that, but the majority of my time usually
 12 is at the apartment which is my main residence.
 13 That's my residence.
 14 Q So you're saying that the Timpaige house -- what do
 15 you call that with -- within JMMI? What have you --
 16 A A ministry residence. Residential center.
 17 Q Okay. Residential center?
 18 A Yes, mm-hmm.
 19 Q And what do you -- have you purchased this?
 20 A Yes, mm-hmm. The ministry --
 21 MR. POTTS: He or the --
 22 THE WITNESS: The ministry.
 23 MR. POTTS: The evening master?
 24 MS. RONAYNE: Right.
 25 THE WITNESS: The ministry.

1 BY MS. RONAYNE:
 2 Q And you use that as a residential center?
 3 A Yes.
 4 Q And so, when you you're saying you had to fix it up,
 5 what were you doing to it?
 6 A Well, I mean, moving again and that kind of thing.
 7 Q Moving what in?
 8 A You know, just possessions of the ministry and stuff
 9 like that. You know, when you move in a new place,
 10 you take things and --
 11 Q But people sleep there?
 12 A Not necessarily on a regular basis. If I have guests
 13 who may come out of town, they may come and I may
 14 take them over there for dinner or something like
 15 that.
 16 Q And do they sleep there also?
 17 A Yes, they have been able to do that. But usually I
 18 have a hotel for them.
 19 Q And Debbie Frazier has slept there?
 20 A No.
 21 Q Debbie Frazier has been there, hasn't she?
 22 A Yes, mm-hmm.
 23 Q With you?
 24 A Our whole staff has been, yeah. It's a ministry
 25 center.

1 Q You've had barbeques and pool parties at that house?
 2 A Yes, mm-hmm, for the ministry.
 3 Q For staff?
 4 A Yeah, for staff.
 5 Q Do you consider Debbie Frazier staff?
 6 A Yes, she has been on the staff, and I'm for sure.
 7 Q What is her title?
 8 A There's no title, we don't keep titles.
 9 Q She doesn't have a -- any kind of reference to what
 10 her -- well, what's her job description?
 11 A She's basically a volunteer staff like most of the
 12 other people, and they just -- they help in any area
 13 where they can or they're asked, so there's no title.
 14 Q So to be considered on staff --
 15 A Mm-hmm.
 16 Q -- how much time do you have to spend volunteering?
 17 A Well, that's flexible according to each person, how
 18 much time they can give, because it's a volunteer
 19 staff.
 20 Q Well, I understand that. But -- because opposed to
 21 somebody who occasionally volunteers as opposed to
 22 someone who gets the -- the title of being on staff?
 23 A We don't have no distinctions like that. The only
 24 thing is any time the person can volunteer for the
 25 ministry, then, that's, you know, that's their

1 contribution as a volunteer. That's what volunteer
 2 means, to voluntarily use their free time to work.
 3 Q So is every single person who volunteers in any
 4 manner considered on staff?
 5 A Not necessarily. They have to come in, say, well, we
 6 would like to be a part of the integral -- the bigger
 7 workings of the ministry.
 8 Q Okay. That's what I'm talking about.
 9 A Okay. So what are you -- can you rephrase it or make
 10 it plainer so I can understand you.
 11 Q All right. So she -- Debbie Frazier is considered on
 12 staff?
 13 A Yeah, mm-hmm.
 14 Q Okay. And so, to have become on-staff she would have
 15 to come and ask to be an integral part for the
 16 ministry?
 17 A Yes.
 18 Q And it doesn't matter whether she could participate
 19 once every three months or daily?
 20 A Right.
 21 Q Okay. Does she have any specific functions, locally,
 22 in Taylor?
 23 A Well, anything that she's probably told to do, like
 24 the other volunteers that -- or that can be done
 25 through her, yes, you know, that would be

- 1 appropriate.
- 2 Q So tell me some things Debbie does for the ministry.
- 3 A The only thing that I'm aware of that she does is
- 4 more so ushering or, you know, being hospitable to
- 5 the people as they come into the doors.
- 6 Q But she goes to the Taylor location almost daily?
- 7 A Yes.
- 8 Q So what --
- 9 A That's the --
- 10 Q You don't have --
- 11 A That's --
- 12 Q Well, let me just say, you don't have daily things
- 13 where she would be ushering at that?
- 14 A No, no, no. Of course not. So those -- that will be
- 15 more behind the scene work.
- 16 Q All right.
- 17 A So I don't --
- 18 Q What is the behind the scene work?
- 19 A I really can't tell you, I honestly don't know.
- 20 Q You have no idea?
- 21 A No. Because I have other staff who -- they are
- 22 running that part of the ministry and they give
- 23 orders to whatever volunteers come in and tells them
- 24 what they should do.
- 25 Q Who's in charge of that?

- 1 A Michelle Brannon.
- 2 Q Both in Michigan and in --
- 3 A Yes, mm-hmm.
- 4 Q -- St. Louis?
- 5 A Yes.
- 6 Q So how much time does Michelle spend in Michigan?
- 7 A Not that much. Most of it is in St. Louis. Our
- 8 Michigan base is like an adjacent base or you'll call
- 9 it a remote location, you know, that we are doing
- 10 business out of, too. But her main time is spent in
- 11 St. Louis.
- 12 Q So who is in Taylor on a daily or weekly basis
- 13 directing Debbie Frazier with what work should be
- 14 done?
- 15 A Like I say, Michelle Brannon is the one over that.
- 16 She's the one that gives the orders -- allowed to
- 17 oversee that part of it as well.
- 18 Q Even though she's not here?
- 19 A Right. She can call by phone from St. Louis and take
- 20 -- do that.
- 21 Q And what kind of work happens at the Taylor location?
- 22 What happens there? You've got an office there?
- 23 A Yes.
- 24 Q Okay.
- 25 A Offices there.

- 1 Q So what -- what do you -- what kind of work do you do
- 2 there?
- 3 A Now, you know, when you say -- doing ministry time or
- 4 behind the scene time?
- 5 Q Well, what kind of work would Debbie Frazier be going
- 6 there to do on a daily or weekly basis?
- 7 A Like I say, I think that will be better answered by
- 8 the person that I have over her because I'm not
- 9 involved in all the intricate details of those
- 10 things.
- 11 Q You don't know what Debbie Frazier does there?
- 12 A No, I really don't. Other than I know -- I've seen
- 13 her doing the services when she ushers and doing
- 14 things like that.
- 15 Q No, I'm -- I'm not really talking about services
- 16 because that's really, what, once a month?
- 17 A Well, that's the time I see -- you know, because I'm
- 18 basically in most of the time and out.
- 19 Q All right. Can you give an estimate as to the number
- 20 of times you have seen or -- not ushering, but
- 21 personally seen or interacted with Debbie Frazier?
- 22 A It's very rare. It's usually in passing, very
- 23 sporadically in a service or something like that.
- 24 Q Aside from an actual service --
- 25 A Mm-hmm.

- 1 Q -- describe your contact with Debbie Frazier.
- 2 A Well, I really don't have any contact with her like
- 3 that at all other than if I pass and see her among
- 4 all the staff and I say hello to all of them and it's
- 5 -- that's basically it.
- 6 Q So you -- you never minister to her?
- 7 A What do you mean minister?
- 8 Q Meet with her.
- 9 A No, of course not.
- 10 Q Well, why do you say of course not?
- 11 A No, because you're saying do I ever meet with her?
- 12 Q Right.
- 13 A But, no, I don't.
- 14 Q Well, for example, a minister -- or someone may come
- 15 to minister or a pastor or someone they perceive to
- 16 be a minister or pastor, with their troubles or
- 17 concerns.
- 18 A Oh, ask for counsel? You -- that's what you're
- 19 saying?
- 20 Q Right.
- 21 A What you're referring to?
- 22 Q Right.
- 23 A No, I don't. Actually, I have people set up to do
- 24 that.
- 25 Q And who are those people?

- 1 A Michelle Brannon is really the key.
 2 Q It sounds like she does everything?
 3 A Not everything, but she's really the executive in the
 4 ministry that helps keep the --
 5 Q Who --
 6 A -- administrative order.
 7 Q Who else besides, you know, I said she does
 8 everything and you kind of laughed and said, no, not
 9 everything. So who -- who fills in what Michelle
 10 doesn't do?
 11 A Well, I don't understand how to share this with you
 12 other than that I have one point person who
 13 administrates the staff or the volunteer group of
 14 people and they give out the orders, and she has a
 15 staff conference call every Tuesday and she gives out
 16 the orders that way. So, you know, it may look like
 17 it's difficult for her to do, but really with
 18 technology it's -- it's simplified.
 19 Q So your right-hand person, then, is Michelle?
 20 A Yes.
 21 Q All right. And besides Michelle, who is the next
 22 person that you rely on the most?
 23 A Well, she's the -- mostly the only one at this time.
 24 Q So you don't have any contact with any other staff to
 25 delegate responsibilities or jobs?

- 1 A Well, that's -- that was the point of making her the
 2 executive, to take on all that for me.
 3 Q So you don't -- you don't have contact with other
 4 staff?
 5 A Oh, it's not that I don't have contact. I don't -- I
 6 don't think it's the kind of contact that you are
 7 referring to.
 8 Q Well --
 9 A Mm-hmm.
 10 Q -- differentiate, then, for me.
 11 A Well, the kind of contact I think you're referring to
 12 is if I'm sitting with them, giving them orders like
 13 that, and I -- I don't actually because I'm so busy,
 14 honestly, and tired a lot of times, so this is why I
 15 hired Michelle to come in and to be the executive,
 16 and I trained her so she could --
 17 Q What are you -- you said you're so busy. What are
 18 you so busy with?
 19 A Traveling. Itinerary.
 20 Q What do you mean?
 21 A Ministering. Traveling different places preaching
 22 the Gospel.
 23 Q Can you tell me places you traveled last year?
 24 A Yeah. North Carolina, Virginia, California, Ohio,
 25 Florida, West Palm Beach. So many other places.

- 1 I -- I -- I -- so many places, I don't remember all
 2 of them but these are just some of the places I
 3 remember.
 4 Q Out of the country?
 5 A Last year I stopped my international travel to work
 6 on TV ministry but --
 7 Q You stopped your -- I didn't -- I didn't hear you.
 8 A Yeah. I postponed my international travel so that I
 9 could -- well, I was supposed to pick up at the end
 10 of last year but we were doing a TV launching so I
 11 needed to stay in the states for that.
 12 Q A TV launching?
 13 A Mm-hmm.
 14 Q You have to answer yes or no.
 15 A Yes, mm-hmm.
 16 Q And what does that mean?
 17 A TV ministry, a national TV broadcast.
 18 Q And --
 19 A But the year before that, you know, and all the years
 20 before that I did all the international travel, and
 21 so I had to postpone most of the international travel
 22 to this year -- back to this year again.
 23 Q And when you did travel internationally where did you
 24 go?
 25 A Korea, Jamaica -- I mean, not Jamaica -- I'm sorry --

- 1 the Bahamas, to Budapest, Hungary, to -- those were --
 2 I think I spent the majority of my time in Korea last
 3 year, back and forth there so --
 4 Q So when --
 5 A -- I wasn't --
 6 Q When you go there do you take other people from JMMI?
 7 A Yes, mm-hmm.
 8 Q Who goes with you?
 9 A Michelle goes. It depends on who I choose to go or
 10 who she will choose to go for -- so Michelle went,
 11 Joseph -- Pastor Joseph goes.
 12 Q How do you spell his name?
 13 A J-o-s-e-p-h.
 14 Q Who was he? What's his last name?
 15 A Busch.
 16 Q B-u --
 17 A Mm-hmm.
 18 Q -- s-c-h or --
 19 A Yes. B-u-s-c-h, uh-huh. Then I'll allow other
 20 constituents beside this administrative group, like
 21 if they want to go on a ministry trip and -- of
 22 course, Debbie went on one of those trips and a few
 23 other people went.
 24 Q And which one did Debbie go on?
 25 A Korea.

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- 1 Q And when there are these trips, who pays their way?
 2 A Normally our ministry take care of it, but the --
 3 that's for the administrative. But people who want
 4 to volunteering go, they pay their own way.
 5 Q So Debbie paid her own way?
 6 A I think so, yeah.
 7 Q So when you're in these stateside locations, do you
 8 rent or lease out a church to preach out of?
 9 A No. I'm invited by leaders in different cities and
 10 countries.
 11 Q So who would be a leader in Korea that would invite
 12 you?
 13 A There's a number. I was with the Presbyterian
 14 leaders there, I don't remember their names, and I
 15 was with Kim.
 16 Q Kim?
 17 A Apostle Kim.
 18 Q How do you spell that?
 19 A K-i-m.
 20 Q Who -- who was that?
 21 A She is a leader over there that's pioneered in Korea
 22 for a long time.
 23 Q What do you mean by leader?
 24 A Leader like --
 25 Q Pardon me?

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- 1 A A leader or a pastor. Just a pastor. She's a pastor
 2 over there.
 3 Q So when you go there do they pay your way?
 4 A Yes. Actually, they -- well, I pay my own way to get
 5 over there, but they -- they support the ministry.
 6 Q What does that mean they support the ministry?
 7 A They give finances or whatever else support that we
 8 need, the place to stay, hotels.
 9 Q So they pay for that?
 10 A We actually pay for it ourselves but they reimburse
 11 or they'll give a donation that will cover that
 12 expense for that.
 13 Q Would that be Kim -- C-h-i-m? Chim?
 14 A Yeah. Chini (phonetic) Kim.
 15 Q Pardon me?
 16 A Chini. Chini Kim.
 17 Q C-h-i-m Kim?
 18 A Oh, okay.
 19 Q Chim Kim?
 20 A Yeah, yeah.
 21 Q Is that who that is?
 22 A I think -- yeah. Is that how it is --
 23 Q That --
 24 A -- spelled there?
 25 Q Yes.

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- 1 A Okay, great, then that probably Kim.
 2 Q Okay. So the Koreans donate to your ministry, you're
 3 saying?
 4 A Mm-hmm.
 5 Q You have to answer --
 6 A Yes, mm-hmm.
 7 Q Okay. So when you're stateside, for example, in
 8 Florida or West Palm Beach, are you saying you're
 9 just a guest preacher?
 10 A Yes.
 11 Q And is the goal to get donations?
 12 A No. It's to preach the gospel actually.
 13 Q And do you ask for donations there?
 14 A Yes, we have before, mm-hmm.
 15 Q And do you receive cash from these areas?
 16 A Yeah.
 17 Q Can you name one church you went to in West Palm
 18 Beach?
 19 A I know -- I don't remember the name of the church,
 20 but the pastor I do. Pastor Artrick (phonetic) and I
 21 can't remember the name of his church.
 22 Q So where do you physically spend most of your time?
 23 A I'm sorry. I don't understand what --
 24 Q In what state are you most present physically?
 25 A St. Louis.

Page 25

- 1 Q And -- and would second be Taylor, Michigan?
 2 A I wouldn't say that because I'm traveling so much. I
 3 think most of my time is spent traveling around the
 4 nation and different parts of the world.
 5 Q All right. So you're saying at Victory Lane, the
 6 only person that lives with you there is Joshua; is
 7 that correct.
 8 A Mm-hmm.
 9 Q You have to answer yes.
 10 A Yes.
 11 Q Okay. And has anybody else lived with you there in
 12 the last three years?
 13 A No. I've had people help me as the ministry got
 14 bigger, and so I wouldn't say people just live with
 15 me but they support it by coming to help me.
 16 Q Okay. I'm not sure what that means.
 17 A Well, I mean, just I may have some staff come over
 18 and they may spend the night here or there, that kind
 19 of thing, and help me out whatever I need for to get
 20 out of town or something like that.
 21 Q You described the Victory Lane place as a very small
 22 apartment.
 23 A Mm-hmm. Yeah, a two bedroom.
 24 Q Okay. So you're saying you have staff that come and
 25 spend the night there?

1 A Well, they will if they have to if I've got to -- I
 2 got to get out of town the next day and we're taking
 3 care of business and things like that, so it's --
 4 it's -- it's -- I wouldn't say that they just stay
 5 there, you know.
 6 Q Is there anybody that spends more than two nights in
 7 a row there?
 8 A No.
 9 Q What is JMMI's relationship to the property at 11833
 10 South Branridge Road in St. Louis?
 11 A Say that again. I'm sorry.
 12 Q The property at 11833 South Branridge Road in St.
 13 Louis, you're aware of that property?
 14 A I'm not by the address. If you will give me a little
 15 bit more information which one.
 16 Q Well, I'll show you a picture of the house.
 17 A Okay.
 18 Q I guess if that's called a house.
 19 A Yes.
 20 Q Is that familiar to you?
 21 A Oh, yeah, the ministry. That's the ministry. It's
 22 -- that don't even look like the house there. That
 23 don't look like the -- yeah, that's why I'm not
 24 knowledgeable -- knowledgeable that --
 25 Q JMMI --

1 A Yeah.
 2 Q -- is listed under them?
 3 A Yeah. But that -- we probably use that like for a
 4 start-up place for -- I can't -- this was -- this is
 5 not where we are now. I -- I -- I can't say. I
 6 don't know what place that is. I don't know if that
 7 was just -- that really don't look like the -- the
 8 house that we currently have as the ministry. I
 9 don't --
 10 Q You don't know?
 11 A No. I mean, that -- that don't look like the
 12 location we have now.
 13 Q Do you have more than one ministry house?
 14 A We have just one, that's it, other than the
 15 residential center that's on Timpaige. We have one
 16 other --
 17 Q Have you ever had more than one simultaneously with
 18 another?
 19 A Not really, no.
 20 Q Is the house that's 5209 Trail Oaks Drive, Black
 21 Jack, Missouri, is that --
 22 A Yeah, this is the one here. Yeah.
 23 Q So are you saying that at some time you may have used
 24 the South Branridge home but you don't currently?
 25 A Yeah, right. Maybe that's what happened and that's

1 why it looks that, but that is not current. This is
 2 what I know that the ministry rents out in our own
 3 name. Mm-hmm.
 4 Q So can you give a timeframe for when the South
 5 Branridge Road house was used?
 6 A I can't. I'm -- I'm not sure of that.
 7 Q All right. But is it your testimony that it has no
 8 relationship to JMMI or you at this point?
 9 A No.
 10 Q Is it your testimony that --
 11 A Yes. No, no, it doesn't. I don't --
 12 Q It has no relationship to you?
 13 A No, no.
 14 Q Now, this one on Trail Oaks, that's the one you
 15 referred to as the ministry house where you didn't
 16 know the address before?
 17 A Right, mm-hmm. I don't.
 18 Q Is this in a residential area?
 19 A Yes, it is.
 20 Q And do you own this house?
 21 A No. We're leasing it.
 22 Q You lease. And what happens at this house?
 23 A Well --
 24 Q It's purpose?
 25 A Well, I think I shared last time, it's a place where

1 I allow those who may be volunteering and they come
 2 to the city to want to work for the ministry, and so
 3 they may not have a place to stay so I'll allow them
 4 to stay there if they want or if they need that, you
 5 know, maybe one or two people. But it's also a place
 6 where we have done like -- in St. Louis it's one of
 7 our start-up places until we build the facilities
 8 that we are saving money for.
 9 Q What do you mean start-up?
 10 A Well, like, you know a small business start in
 11 garages, that kind of thing. Yeah.
 12 Q Do you hold meetings there?
 13 A No, mm-uh.
 14 Q And this was in a residential -- it looks almost like
 15 a sub -- a subdivision kind of house?
 16 A Mm-hmm.
 17 Q You have to answer yes or no.
 18 A Yes, mm-hmm.
 19 Q All right. And the subdivision allows you to run a
 20 ministry out of that house?
 21 A Well, actually we've talked with them and it's not
 22 wrong that we are -- because we're not doing no kind
 23 of big operation out of it, it's just like a start-up
 24 business like many American companies start in
 25 garages here in this country.

1 Q So when Debbie Frazier goes to St. Louis --

2 A Mm-hmm.

3 Q -- does she stay at this residence?

4 A Not that -- no, not that I know of. I'm not positive

5 about that. I don't -- I don't think there's room

6 there for that.

7 Q What do you mean there's not room?

8 A Room to stay there like that.

9 Q I thought you said you allowed people to stay there?

10 A Yeah, I said, you know, if there's room or -- but I

11 don't think there's room for nothing like that.

12 Q Okay. So what do you --

13 A I'm sure she may get a hotel when she's in town. I

14 don't know. But she -- it would be good if you could

15 ask Michelle because she deals with that.

16 Q So what is that place used for? What's the

17 residential used for if people don't stay there?

18 A Well, I just shared what it's used for. That it's,

19 you know, one of our start-up locations to help the

20 ministry save money as an overhead until we build

21 what we're going to build there as the global

22 headquarters.

23 Q And so what happens at that residential house?

24 People don't stay there. You said Debbie Frazier

25 doesn't stay there. I thought it was for volunteers

1 to stay. So what do people go to that house to do?

2 A Well, there are computers there that, you know, they

3 just do minimum work, tasks to organize the ministry

4 or answer phones or stuff like that.

5 Q It's a work center?

6 A I wouldn't call it a work center. It's more of a

7 start-up place like -- like a small business -- you

8 know, like a small business that Americans do, they

9 start up in the garage.

10 Q I -- I know, you keep saying that. But what is it

11 that happens in there? Is it -- it's work --

12 A Yeah.

13 Q -- is that what you're saying?

14 A It's volunteer work, yeah. You could do -- you could

15 say that. Every --

16 Q Okay. So it's like an office?

17 A Almost, yeah, like a start-up. It's the same thing

18 of a small American company in a garage.

19 Q Okay. I'm not interested in small American

20 companies.

21 A I'm just telling you --

22 Q Sir.

23 A Yeah.

24 Q We have to not talk at the same time.

25 A Okay, mm-hmm.

1 Q I'm trying to figure out what the purpose of this

2 location is, and your -- is it your testimony that

3 this is an office where people go to work for JMMI?

4 A Yeah. I mean, the only way -- I'm trying to explain

5 to you what it is. Do you understand what a small

6 business is in America?

7 Q Sir, that -- that's not -- you don't get --

8 A Well, I'm trying to answer your question. If you

9 don't listen to what I'm saying, then, you're not --

10 Q This is not a dialogue. I ask you questions and you

11 respond.

12 A I'm answering them.

13 MR. POTTS: Do the best you can to

14 answer the question. If you don't understand the

15 question, you have to just -- if you don't answer

16 it --

17 THE WITNESS: Mm-hmm.

18 MR. POTTS: -- that's one thing.

19 THE WITNESS: Okay.

20 MR. POTTS: But you have to answer the

21 question that's asked of you to --

22 THE WITNESS: Yes.

23 MR. POTTS: -- to the best of your

24 ability.

25 THE WITNESS: And I'm answering the

1 only way I know to explain to you what we're doing is

2 like a small business out of a garage.

3 MS. RONAYNE: Okay.

4 BY MS. RONAYNE:

5 Q So is it --

6 MR. POTTS: That's -- that's an

7 analogy. You can tell him, do you answer the phones?

8 Do you greet the greeters?

9 THE WITNESS: Yeah. I just --

10 MR. POTTS: Do you send out mail?

11 Whatever you do.

12 THE WITNESS: Yeah.

13 MR. POTTS: Things like that. What do

14 you do there?

15 BY MS. RONAYNE:

16 Q So it's an office?

17 A I do -- we do minimum office work or answer phones.

18 Q So it's an office?

19 A I guess, if that's what you want to call it. I don't

20 know what --

21 Q No. It's not what I want to call it.

22 A What --

23 Q I'm trying to get a handle on --

24 A Well, that's not what we call it so I -- I can't -- I

25 can't --

- 1 Q What do you call it?
- 2 A I call it a start-up place.
- 3 Q Go to the start-up place --
- 4 A Okay.
- 5 Q -- is that what you say?
- 6 A Yeah -- no, I don't say that. I just call it a place
- 7 where -- you know, we don't have a name for it. We
- 8 just know what we are doing with the place so.
- 9 Q All right. When you are talking about somebody being
- 10 there, how do you refer to this location?
- 11 A What do you mean?
- 12 Q What do you call it, go to the office? Go to -- what
- 13 do you say? What do you refer to this place as?
- 14 A Well, we surely don't call it an office. We just --
- 15 we call it a house, you know, go to the place.
- 16 Q Go to the place?
- 17 A House. Yeah, mm-hmm.
- 18 Q But is there any activity that goes on at that house
- 19 that is not, in essence, office work for the
- 20 ministry?
- 21 A No, not that I know of. No.
- 22 Q Okay. So it's an office where people are phone
- 23 calling, doing mail; is that what you're saying?
- 24 A Yeah. Some of that takes place, yes.
- 25 Q Okay. And what else takes place?

- 1 A That's it. That's all I know for that, honestly.
- 2 Q Because you've been there?
- 3 A Yes, mm-hmm. That's why I know what goes on.
- 4 Q When Debbie Frazier goes to St. Louis to do work for
- 5 the ministry, is that where she goes?
- 6 A She has been there, yes.
- 7 Q Where else would she go to do work for the ministry
- 8 other than this location?
- 9 A That's the only place I know she goes from my
- 10 understanding.
- 11 Q Are there any people who sleep at this house
- 12 regularly?
- 13 A Yes, there are people that do sleep there.
- 14 Q Who is that?
- 15 A Honestly, I don't know those, you know, know who
- 16 does. It's kind of --
- 17 Q You have no idea who sleeps there?
- 18 A No. So -- but you can ask Michelle, she should know
- 19 those answers.
- 20 Q Do you know how many sleep there?
- 21 A No.
- 22 Q Are -- and this is a three-bedroom house?
- 23 A Actually, I really don't know how many bedrooms it
- 24 is.
- 25 Q And you don't know who sleeps there on a regular

- 1 basis?
- 2 A No.
- 3 Q Are they staff members?
- 4 A They would be volunteers, yes. Yes. Someone who
- 5 needs a place to stay.
- 6 Q Was JMMI paying any of your auto expenses?
- 7 A Yes.
- 8 Q And how much?
- 9 A Auto expenses? I wouldn't -- I wouldn't know exactly
- 10 how much.
- 11 Q You don't know how much you got?
- 12 A No.
- 13 Q Who would know?
- 14 A The board takes care of that.
- 15 Q Who's the board?
- 16 A You can ask Michelle. She's another person to refer
- 17 to.
- 18 Q What about your housing, does JMMI pay any of that?
- 19 A Yes, mm-hmm.
- 20 Q You get a housing allowance?
- 21 A Yes.
- 22 Q And how much is that?
- 23 A I'm not sure.
- 24 Q And do you report these allowances as compensation on
- 25 your tax return?

- 1 A Honestly, I don't know how all that work. I have
- 2 other people who does -- do that so you can refer to
- 3 Michelle all that.
- 4 Q Michelle does your taxes?
- 5 A No. I have other people do it, but she's over a lot
- 6 of that, the financial aspect, too.
- 7 Q So who does your taxes?
- 8 A I -- some firm. I -- I don't know. I have a
- 9 financial board that Michelle runs and they have all
- 10 that so you can ask her.
- 11 Q So does she handle your personal finances in addition
- 12 to JMMI's finances?
- 13 A Yes, all of it.
- 14 Q Your personal and JMMI's?
- 15 A Yes.
- 16 Q On the November 11th, 2014, JMMI Balance Sheet that
- 17 you produced at your last deposition, that lists over
- 18 a million dollars as an asset labeled Collectibles.
- 19 A Mm-hmm.
- 20 Q You have to answer yes.
- 21 A Yes, mm-hmm.
- 22 Q And, What are those?
- 23 A Well, those collectibles that a donator, who donated
- 24 over a million dollars in collectibles to the
- 25 ministry. So it -- it comprises of all these

1 different things that -- that values to that much.
 2 Q What kind of things?
 3 A Old toys, you know, stuff like that. Collectibles,
 4 you know, the old things that people would spend
 5 certain amounts of money for.
 6 Q Is this an antique collector or something?
 7 A Not an antique -- I don't remember antiques. But
 8 baseball cards, you know, that's -- things like that.
 9 Barbie dolls.
 10 Q Where are those things located?
 11 A They're in St. Louis.
 12 Q Where?
 13 A In -- I thought they were in a storage place.
 14 They're in a storage place.
 15 Q And what's the plan for those?
 16 A Oh, to liquidate that and -- for the ministry.
 17 Q Well, who's the person donated that?
 18 MR. POTTS: Objection.
 19 MS. RONAYNE: We have an order that
 20 he is required to disclose anybody that's over
 21 \$5,000.
 22 MR. POTTS: Can I see that?
 23 MS. RONAYNE: Yeah, but it will take
 24 -- I'll forget it and then -- mm-hmm?
 25 MR. POTTS: I have (inaudible)

1 MS. RONAYNE: Well, can't you --
 2 MR. FRAZIER: It's on the Balance
 3 Sheet. It's on the 990 which are public documents.
 4 MS. RONAYNE: Yeah. It's on public
 5 documents that the ministry has to file.
 6 MR. POTTS: Well, if they've been
 7 filed, that's one thing.
 8 MS. RONAYNE: Yeah, it's on their
 9 Balance Sheet, 2014.
 10 MR. POTTS: Well, they don't have to
 11 file their Balance Sheet.
 12 MS. RONAYNE: Yeah. They have to file
 13 their -- their financial information with the IRS,
 14 and there's --
 15 MR. POTTS: Well, they -- it depends.
 16 They have to file certain information with the
 17 return.
 18 MS. RONAYNE: Which includes donors.
 19 MR. POTTS: Well --
 20 MS. RONAYNE: I can tell you the
 21 November 12th, 2014, order covers only individuals
 22 who donate less than \$5,000.
 23 MR. POTTS: Well, if they're required
 24 to file --
 25 MS. RONAYNE: He's required to produce

1 objection.
 2 MS. RONAYNE: Yeah, what is the
 3 objection.
 4 MR. POTTS: Well, first of all it may
 5 be -- it may be privileged. It may be somebody
 6 else's identification of who they are, so to the
 7 extent that it's public, I have no problem.
 8 MS. RONAYNE: It has to be public
 9 because it's --
 10 MR. POTTS: If it's already been --
 11 MS. RONAYNE: -- a charity.
 12 MR. POTTS: -- publicized and
 13 reported, that's one thing. If it's not, then,
 14 that's another question. I -- I just need to see it.
 15 MS. RONAYNE: It has to be reported
 16 with the charity because they have to --
 17 MR. POTTS: But I don't know that it
 18 has been, so I just -- I just need to know.
 19 BY MS. RONAYNE:
 20 Q When did you receive these? Well, it's on there.
 21 2014.
 22 MR. POTTS: It could be on a P&L, it
 23 could be a -- it could be somehow disclosed, being
 24 held by another entity. I just need to know what the
 25 scope of this is because --

1 the --
 2 MR. POTTS: If the entity -- no,
 3 that's not my --
 4 MS. RONAYNE: Yeah.
 5 MR. POTTS: -- my objection. My
 6 objection is: If they are required -- if the
 7 ministry's required to file any kind of forms, state,
 8 federal, or otherwise, then I have no objection.
 9 MS. RONAYNE: It -- they are.
 10 MR. POTTS: All right. Now I need to
 11 see the scope of the order so that it defines what
 12 has to be produced. Just --
 13 MS. RONAYNE: Any -- it all has to be
 14 produced.
 15 MR. POTTS: Just because the Court
 16 decides it wants to order something to be produced,
 17 doesn't mean that it's appropriate. It --
 18 MS. RONAYNE: But a court order is a
 19 court order.
 20 MR. POTTS: No. Yeah. But --
 21 MS. RONAYNE: It's a court order.
 22 MR. POTTS: It is as far as --
 23 MS. RONAYNE: If he has to disclose --
 24 or JMMI has to disclose who their donors are, so
 25 that's what I'm asking: Who's the donor?

1 MR. POTTS: Well, first of all this is
2 the witness. He's not JMML.
3 MS. RONAYNE: He -- for all intents
4 and purposes, he is JMML.
5 MR. POTTS: But he's not. He's not.
6 MS. RONAYNE: He's the president and
7 CEO.
8 MR. POTTS: Okay. We'll allow this
9 because this -- the order requires it not be
10 disseminated.
11 MS. RONAYNE: No, it only -- I can
12 only not disseminate --
13 MR. POTTS: This information --
14 MS. RONAYNE: -- the less than \$5,000.
15 MR. POTTS: -- cannot be disseminated
16 by defendant until -- it says this -- until further
17 order of the court, period.
18 MS. RONAYNE: Let me read the whole
19 thing, that's not what it says.
20 MR. POTTS: Well, it says this
21 information referring to the amount of the
22 definition.
23 MS. RONAYNE: It says the protective
24 order shall be applicable to govern any and all
25 information -- things that obtained, received, or

1 regarding individuals who donate less than five. You
2 still have to supply it, but it will not be
3 disseminated. Only --
4 MR. POTTS: Okay. Fine.
5 MS. RONAYNE: Only less than five.
6 MR. POTTS: That's my point.
7 MS. RONAYNE: So if he's over five,
8 it's public information.
9 MR. POTTS: It doesn't say -- if it's
10 public information.
11 MS. RONAYNE: It is.
12 MR. POTTS: Look, I need to know that.
13 I need to see that --
14 MS. RONAYNE: It's reported on the tax
15 returns who their donors are if they're over five.
16 MR. YATOOMA: If I can intermit.
17 MR. POTTS: Yeah.
18 MR. YATOOMA: The IRS 990 requires
19 charities --
20 MR. POTTS: I know what a 990 is and I
21 don't represent he had any, that's my concern. I
22 don't -- Mr. Colon represents the entity, and to the
23 extent he has an objection on the 990 --
24 MS. RONAYNE: Is he representing me on
25 it? I thought that was just for show?

1 MR. POTTS: No, he's represented on it
2 as well.
3 MS. RONAYNE: Well, if the order says
4 that the only thing it protects are people that are
5 under 5,000 because they don't have to be named,
6 people that are over 5,000 get named.
7 MR. POTTS: To the extent that they
8 have been disclosed in a form filed federally, then I
9 have no objection.
10 MS. RONAYNE: That's -- that's what
11 happens if you do over five.
12 MR. POTTS: To the extent that they
13 have done that. I have no objection if they've been
14 previously required to do -- forward to the federal
15 government, state agency, or any reporting agency.
16 MS. RONAYNE: This protective order --
17 MR. POTTS: Well, that's if they did.
18 MS. RONAYNE: -- only refers to 5,000
19 and less donors. Otherwise --
20 MR. POTTS: I see that.
21 MS. RONAYNE: -- it's not protected.
22 MR. POTTS: Well, then, the objection
23 would only be to the extent that these have been
24 previously disclosed and they're there, then, I have
25 no objection --

1 MS. RONAYNE: Well --
2 MR. POTTS: -- to him answering the
3 question if he knows the information.
4 MS. RONAYNE: I don't know if he has
5 filed 2014 returns and --
6 MR. POTTS: I -- I don't --
7 MS. RONAYNE: -- he's going to have to
8 and disclose them.
9 MR. POTTS: -- know that yet, but I
10 know you got -- I believe you got '12 and '13. I
11 don't know the Court's --
12 MS. RONAYNE: It's on their balance
13 sheet which we'll -- I don't think that there's any
14 privilege. I don't think that there's any legitimate
15 objection to it. The order covers only people with
16 less than five because they don't have to be named or
17 given statements.
18 MR. POTTS: This is what I don't want
19 to do. I don't want to go back and fight the war
20 that apparently was or was not fought over disclosure
21 over what I think are irrelevant. It's irrelevant
22 information. But I'm not going to fight that.
23 MS. RONAYNE: Okay.
24 MR. POTTS: I do want to make sure,
25 though, if you ask a question, that there's already

1 been a disclosure -- a public disclosure of the form
 2 -- it can be -- it could be a 990, it could be any
 3 kind of mandated requirement that he or the entity --
 4 not he, but the entity -- has to file because of its
 5 charitable status. I think it's probably a not-for-
 6 profit corporation. He files under some sort of
 7 charitable designation as to the federal agency --
 8 MS. RONAYNE: And they have to list
 9 them.
 10 MR. POTTS: -- and they have to file
 11 forms. If those are filed, then I have no objection
 12 to the question.
 13 MS. RONAYNE: Well, they're going to
 14 be if they haven't, so I don't --
 15 MR. POTTS: If they haven't been, then
 16 they -- you know, they can't talk about something
 17 that will be that hasn't been done, hasn't been
 18 published.
 19 MS. RONAYNE: But there's no --
 20 MR. FRAZIER: He produced the last
 21 balance sheet. They disclosed it so produce that.
 22 MS. RONAYNE: Yeah. I'm not -- there
 23 isn't a basis for your objection. It's not
 24 privileged. It's not subject to a protective order.
 25 I understand you don't like it, but I don't see that

1 status. It's a life --
 2 MS. RONAYNE: Right.
 3 MR. POTTS: -- entity. He is an
 4 individual here --
 5 MS. RONAYNE: That's true.
 6 MR. POTTS: -- subject to subpoena.
 7 MS. RONAYNE: Who also is a CEO.
 8 MR. POTTS: But he's not --
 9 MS. RONAYNE: Of JMML.
 10 MR. POTTS: -- here in that capacity.
 11 MS. RONAYNE: We didn't differentiate
 12 what his capacity was.
 13 MR. POTTS: Well, you should have
 14 because --
 15 MS. RONAYNE: But I didn't.
 16 MR. POTTS: Well --
 17 MS. RONAYNE: Nobody cared.
 18 MR. POTTS: I care.
 19 MS. RONAYNE: You may but it hasn't
 20 happened so far.
 21 MR. POTTS: Well, I'm caring and
 22 making an objection --
 23 MS. RONAYNE: Okay.
 24 MR. POTTS: -- that he's not the real
 25 -- the party to be -- he's the witness. He is a

1 it's not answerable.
 2 MR. POTTS: Well, I can make a
 3 relevancy objection and then I could let you take it.
 4 MS. RONAYNE: Then he's -- right. Go
 5 ahead and object and let me take the answer.
 6 MR. POTTS: Will you let me have a
 7 continuing relevancy objection to the form of the
 8 question, objection, or do I have to make it every
 9 time you ask him.
 10 MS. RONAYNE: No. You've got it every
 11 single -- they're ongoing OTTS: So they're ongoing?
 12 MS. RONAYNE: Yes.
 13 MR. POTTS: Okay. Then you can answer
 14 the question. Go ahead.
 15 BY MS. RONAYNE:
 16 Q Who was the person that donated the --
 17 MR. POTTS: Let me just -- form
 18 another -- form a response. He's not the entity even
 19 though he's the officer of the entity, so the
 20 questions aren't posed to him in that capacity. He's
 21 not -- the entity's not a party to these proceedings,
 22 it's not even a witness to these proceedings.
 23 MS. RONAYNE: Okay.
 24 MR. POTTS: It's a separate entity.
 25 It's a not-for-profit corporation, it has legal

1 witness. The entity can be brought here, if it could
 2 be, or a deposition could be taken or documents
 3 produced pursuant to something commonly referred to
 4 like in Purgatory -- in Missouri. If you want to
 5 bring that entity before some sort of body to get
 6 orders and get information from him. If Mr. Poling
 7 were here, maybe he would or would not have had an
 8 objection. If he's not the entity even though he may
 9 be an officer of it, it has separate corporate
 10 identity.
 11 MS. RONAYNE: Okay. All I want to
 12 know is if he knows who this person is that gave a
 13 million dollars in collectibles.
 14 MR. POTTS: Yeah, that's okay if it
 15 has been disclosed.
 16 MS. RONAYNE: Yeah.
 17 MR. POTTS: Give her that.
 18 THE WITNESS: Elsie Clark.
 19 BY MS. RONAYNE:
 20 Q Who is it?
 21 A Elsie. Her name is Elsie.
 22 Q A woman's name?
 23 A Yes
 24 Q E-I --
 25 A Yeah.

1 Q -- s --
 2 A E-I-i-s-e.
 3 Q E-I?
 4 A L -- E-I-i-s-e.
 5 Q Elise?
 6 A I think Elsie. I think you put s after the l.
 7 That's the --
 8 Q All right. So spell it one more time for me.
 9 A E-I-i-s-e.
 10 Q All right. And her last name?
 11 A I'm not sure about that because she -- I think she
 12 was recently married so.
 13 MR. POTTS: What was the name at the
 14 time of the gift.
 15 THE WITNESS: See, I was going -- I
 16 thought it was Clark but I don't want to do what I
 17 did here last time because I don't want them to
 18 accuse me of --
 19 MR. POTTS: Do the best you --
 20 BY MS. RONAYNE:
 21 Q You thought it was who?
 22 A I don't know. I really -- I just rather say I don't
 23 know.
 24 Q No, you don't get a rather. What did you --
 25 A I don't know.

1 Q You said you --
 2 A I don't know.
 3 MR. POTTS: Give your best estimate of
 4 the name, if you recall. Go ahead.
 5 THE WITNESS: Because I think I'm
 6 getting it confused with somebody else's name.
 7 BY MS. RONAYNE:
 8 Q That's okay.
 9 A That's the thing. Elsie Clark, I think.
 10 MR. POTTS: To the best of your
 11 recollection.
 12 THE WITNESS: I don't know.
 13 BY MS. RONAYNE:
 14 Q I think you --
 15 A I'm just confusing it with another. I think that's
 16 wrong. I'm mixing the two names.
 17 Q Is that something Michelle would know?
 18 A Yeah, she would probably know that.
 19 Q And you think these collectibles are in some storage
 20 center in St. Louis?
 21 A Yes.
 22 Q And ultimately it would be to liquidate them?
 23 A Mm-hmm.
 24 Q Yes?
 25 A Yes.

1 Q Okay. Have any of -- is there any inventory of the
 2 collectibles?
 3 A Yes, there should be inventory.
 4 Q And who would have that?
 5 A Michelle would know that.
 6 Q Have any of your ministries, including JMMI, been
 7 audited by the IRS?
 8 A No.
 9 Q Investigated by the FBI?
 10 A No.
 11 Q You or your ministries, that applies to?
 12 A No.
 13 Q So neither you nor your ministries?
 14 A No.
 15 Q Okay. And have you ever been arrested?
 16 A No.
 17 Q Ever been charged criminally with any crime?
 18 A No.
 19 Q Ever been indicted by a grand jury?
 20 A No.
 21 Q Have you ever been sued personally or in any other
 22 capacity?
 23 A No --
 24 MR. POTTS: Think about that, because
 25 that's a large --

1 THE WITNESS: Right. I don't know.
 2 MR. POTTS: I may need to object. I
 3 just don't want to get involved in --
 4 THE WITNESS: I need to kind of
 5 understand what --
 6 MR. POTTS: A lawsuit. Have you ever
 7 been a defendant? Have you been a plaintiff? A
 8 party in a lawsuit? Were you divorced?
 9 THE WITNESS: Yeah. So, yeah.
 10 MR. POTTS: You were --
 11 THE WITNESS: Okay.
 12 MR. POTTS: You were involved in a
 13 divorce.
 14 THE WITNESS: Okay.
 15 MR. POTTS: That's one lawsuit.
 16 THE WITNESS: That's one. Okay.
 17 BY MS. RONAYNE:
 18 Q Did you file or did your wife?
 19 A My wife.
 20 Q All right. Any other lawsuits that you were involved
 21 in?
 22 A Not that I know of.
 23 Q Never been sued by anybody else but your wife?
 24 A No.
 25 Q Never sued anybody else?

1 A No, I don't think -- I don't think I've ever been,
 2 not like --
 3 Q Has JMMI ever been sued?
 4 A I think they have.
 5 THE WITNESS: Is that -- can I say
 6 that?
 7 MR. POTTS: You can answer that.
 8 THE WITNESS: I think they have.
 9 BY MS. RONAYNE:
 10 Q And when was that?
 11 A It was just recent. I think that's what you will
 12 call that. I don't know if that's what you'd call
 13 it. I don't know.
 14 Q All right.
 15 A But I know there's a -- a -- a man named Jim Patrick
 16 that -- that used to be a part of the building, and
 17 he was falsifying things about the ministry owing him
 18 any money and a lot of it was, from my knowledge, was
 19 thrown out, so I don't know if you'd call that a
 20 suit. That was just --
 21 Q Well, was there a lawsuit filed in court?
 22 A I -- yeah, I think we had to go to court so that's
 23 probably what it is.
 24 Q All right. So was Jim Patrick the plaintiff?
 25 A Yeah.

1 Q And he was suing JMMI?
 2 A I guess that's what you'd call it. Is that what
 3 you'd --
 4 Q Well, you --
 5 A I don't know. I really don't know, honestly.
 6 Q Did you go to court?
 7 A No, I didn't go to court.
 8 Q Did you hire a lawyer?
 9 A Yes. The ministry, JMMI did, that is all.
 10 Q And did this occur in St. Louis?
 11 A No. Here in Michigan.
 12 Q In Michigan. Do you know what -- was it downtown in
 13 Wayne County? Was it Taylor court?
 14 A I really don't have the information. I don't know.
 15 Q And what were the basic allegations that were made?
 16 A Just that, you know, he -- he was owed so much money
 17 for so much equipment. He said that it was -- he
 18 owns that he don't have and it wasn't true.
 19 Q I'm sorry. He was owed money for equipment?
 20 A Mm-hmm.
 21 Q You have to --
 22 A Not owed money for equipment, but he was trying to
 23 say equipment was his that wasn't his, which they
 24 found out to be not true what he was saying.
 25 Q So is that resolved and over with?

1 A I'm not sure. You'd probably have to ask Michelle.
 2 I'm not positive.
 3 Q So he was saying, in essence, he wanted the return of
 4 office equipment from JMMI?
 5 A No. I don't know all the details of it so I can't
 6 speak on it. I was not involved in that.
 7 Q What kind of equipment would it be?
 8 A I don't know. I don't have any -- I really don't
 9 have any understanding of the total thing, because
 10 what he's trying to do is really sue the church
 11 before we got the building who -- that he was a part
 12 of.
 13 Q Okay. Wait. Back -- back up.
 14 A Because we bought the building, he's -- I guess he
 15 thought we had his equipment.
 16 Q So what building are you referring to that you
 17 bought?
 18 A In Taylor, Michigan.
 19 Q What building?
 20 A Ministry bulk (phonetic), mm-hmm.
 21 Q What building?
 22 A On the 20320 Superior Road.
 23 Q So you own that building and you lease it to the
 24 church?
 25 A Yes.

1 Q And how much do you get in lease money?
 2 A 3k.
 3 Q A month?
 4 A Yeah.
 5 Q And you also run offices out of there?
 6 A Yes.
 7 Q What about the lawsuit filed in 2006 by GE Capital
 8 Information Technology Solutions where you and
 9 Resurrection Media Ministries were named as
 10 defendants?
 11 A I can't remember everything that that was about. But
 12 I do remember something like that and -- because I
 13 filed bankruptcy, I think, in --
 14 Q Personally?
 15 A Yeah, mm-hmm. And --
 16 Q When did you personally file bankruptcy?
 17 A I think that was in -- was that -- I -- I don't know
 18 the exact year but I know we were having proceedings
 19 around that.
 20 Q Well, approximately? I understand you don't know
 21 exactly but --
 22 A Maybe '05, '06, I don't know (inaudible).
 23 Q All right. So you filed personal bankruptcy and was
 24 it the result of -- or in some way related to the GE
 25 Capital Information lawsuit?

1 A I think. That's been so long ago I don't remember
2 all the details to that.

3 Q What was the essence of the lawsuit?

4 A That's the thing, I don't remember that.

5 Q No idea? Anything about it?

6 A No. I remember the GE name, I just don't remember
7 what it was about.

8 Q But it was significant enough that you filed
9 bankruptcy?

10 A Well, that wasn't the reason why I filed bankruptcy.
11 I just remember the bankruptcy thing happening around
12 that time.

13 Q Why did you file bankruptcy then?

14 A Because of the -- the ratio to debt.

15 Q What kind of debt did you have at the time?

16 A I'm -- what debt did I have? I can't remember all of
17 it, but it's not something I remember in detail. Mm-
18 hmm. I can't -- I can't remember.

19 MR. POTTS: Can I ask a question? To
20 ask you --

21 MS. RONAYNE: Mm-hmm.

22 MR. POTTS: -- where did he file
23 bankruptcy?

24 MS. RONAYNE: Well, I'm going to --

25 MR. POTTS: Just -- if it was here,

1 that is fine.

2 MS. RONAYNE: Well, I'm going to get
3 to that.

4 BY MS. RONAYNE:

5 Q Were you residing in St. Louis when you filed it?

6 A Mm-hmm.

7 Q You have to answer --

8 A Yes, mm-hmm.

9 Q And so did you file it in --

10 A St. Louis.

11 Q -- in the St. Louis Federal District Court?

12 A Yes, mm-hmm.

13 Q And where was this lawsuit by GE Capital? Where was
14 that filed?

15 A I think it's in St. Louis, yeah.

16 Q So would it be fair to say that there probably was a
17 judgment against you that you wanted to discharge in
18 bankruptcy?

19 MR. POTTS: Don't speculate. If you
20 don't know --

21 THE WITNESS: I don't know.

22 MR. POTTS: -- don't speculate.

23 THE WITNESS: I don't know.

24 BY MS. RONAYNE:

25 Q Well, you started to answer questions about GE you

1 mentioned you filed bankruptcy so I assume there was
2 some relationship.

3 A I don't think so. I just -- that came to me and I --
4 I wonder what that was about so I'd just rather say I
5 don't know. I really don't know. It's been so long
6 ago.

7 Q Do you -- if you were guessing, even would you say
8 that you had a judgment against you for that?

9 A I -- I think that was, I guess, for -- I -- I don't
10 know if that was for -- what that was about.

11 Q And you have no recall of what that was? It was
12 about?

13 A No.

14 Q And at that time it was Resurrection Media
15 Ministries?

16 A Yes, mm-hmm.

17 Q And when did that name come into play?

18 A That came in 2000 -- I mean -- I'm sorry -- 1995.

19 Q To --

20 A Because it was legally filed in '98 or maybe before
21 '98. I'm not sure. But around 1994 and '98, around
22 that time.

23 Q And when did it end?

24 A I think 2007 or '06.

25 Q And why?

1 A We just wanted to start a new name.

2 Q Were there debts against this ministry?

3 A Yeah, there was some debts.

4 Q What was your role in this Resurrection Media
5 Ministries?

6 A I was the CEO, yeah.

7 Q Was Michelle involved in that one?

8 A No.

9 Q Who else was on the board for Resurrection?

10 A I don't remember. It's been so long, honestly.

11 Q So did you, in essence, just abandon that name and
12 ministry?

13 A I don't know what you mean by abandon.

14 Q No longer called yourself that? No longer
15 participated under that label?

16 A Right, mm-hmm.

17 Q And you believe -- and you believe that there were --
18 there were debts associated with that?

19 A Yeah, that was --

20 Q Was that part of your reasoning in changing the name?

21 A No. I don't think that was the reason, no.

22 Q Who else was part of the decision to change the name
23 from Resurrection to JMMI?

24 A No one but me.

25 Q Just you?

1 A Mm-hmm.
 2 Q And so why did you do that?
 3 A I wanted to start under a new name.
 4 Q Why?
 5 A I just felt we needed to start under a new name.
 6 Q So there wasn't anybody else on the board but you?
 7 A No. I'm sure there was a board but I don't
 8 remember --
 9 Q Okay.
 10 A -- who they were then.
 11 Q And was there anything in between Resurrection and
 12 Joshua Media Ministries?
 13 A No.
 14 Q So you went from one directly to the other?
 15 A Mm-hmm.
 16 MR. POTTS: That's a yes?
 17 THE WITNESS: Yes, mm-hmm.
 18 BY MS. RONAYNE:
 19 Q What about the lawsuit filed by All Winners
 20 Investments with you and CompuCom IT Solutions that
 21 were named as defendants. Tell us about that one.
 22 A I don't -- I don't remember anything about that other
 23 than that being a -- a company that my ex was
 24 involved in.
 25 Q When you say your ex, who are you referring to?

1 A Tabitha Taylor.
 2 Q But you were named as a defendant.
 3 A Probably, yeah. Because that's -- that was a company
 4 she was in or company she was working with her
 5 business.
 6 Q And what's the timeframe for that?
 7 A Timeframe?
 8 Q When this lawsuit was filed?
 9 A I'm not sure. I think it was around '05. I think
 10 when real estate dropped, because that's what that
 11 was concerning, a real estate business or venture.
 12 Q What is All Winners refer to?
 13 A I don't know.
 14 Q You don't know what the company is?
 15 A No, that -- that wasn't her company, I don't think.
 16 That was a company I said she was working with that
 17 was --
 18 Q Okay. And what was the name of her business?
 19 A I don't know.
 20 Q Was it CompuCom?
 21 A I'm not sure.
 22 Q Would Michelle know about this one?
 23 A No.
 24 Q Was this in St. Louis?
 25 A Yes.

1 Q Was there a judgment against you and or your wife?
 2 A Yea, I think there was a judgment.
 3 Q So that may have also factored into your reasoning to
 4 file bankruptcy, was it this judgment?
 5 A I don't think that was the only thing.
 6 Q I'm not saying the only reason.
 7 A Right, mm-hmm.
 8 Q But one of the factors?
 9 A It might be, mm-hmm.
 10 Q You have to answer yes or no.
 11 A Yes, mm-hmm.
 12 Q You had criminal charges filed against you in Clay
 13 Circuit Court in 2007. What was that about?
 14 A I don't know. I don't remember no criminal charges
 15 against me.
 16 Q You don't remember any criminal charges in Clay
 17 Circuit Court?
 18 A No, mm-uh. I don't ever remember going to any court
 19 about no criminal activity.
 20 Q What about the criminal charges filed against you in
 21 Pettis 18th Circuit Court in 2007 and 2013?
 22 A I don't -- I don't -- I don't know what you're
 23 talking about. The criminal in 2007?
 24 Q 2007 and '13, or any for that matter?
 25 A I don't know. I have never been to court for no

1 criminal charges.
 2 Q Did you ever hire a --
 3 A I understand --
 4 Q Pardon me?
 5 A Go on.
 6 Q Did you ever hire an attorney to represent you in any
 7 criminal defense manner?
 8 A Yes, I have. And that was the only thing I could
 9 think of in '13 is me, you know, when I discipline my
 10 child and that was the only thing so I -- I don't
 11 know anything other than that.
 12 Q Tell me about that one. Was that in St. Louis?
 13 A Yes, mm-hmm.
 14 Q And which child was that?
 15 A That was last year, I think, or the year before last
 16 if I'm not -- '13, that's --
 17 Q Which child?
 18 A Destiny.
 19 Q Your 18-year-old daughter?
 20 A Yes, mm-hmm.
 21 Q And was this done through Children's Protective
 22 Services?
 23 A I think so, yeah.
 24 Q And what were the allegations?
 25 A Well, that -- that I had disciplined her because she

1 skipped class 20 times and -- and they felt me -- my
 2 discipline measure of using a belt was abusive.
 3 Q All right. So you -- you used a belt in disciplining
 4 Destiny?
 5 A I don't know if I could speak on that.
 6 THE WITNESS: Can I speak on this?
 7 Because my -- my lawyer's told me don't --
 8 MR. POTTS: Then, not knowing the
 9 status of this proceedings --
 10 BY MS. RONAYNE:
 11 Q Is it resolved? Is it all done?
 12 MR. POTTS: I'm going to object to the
 13 question.
 14 BY MS. RONAYNE:
 15 Q Well, let me just ask if it -- what the status is.
 16 MR. POTTS: If you know.
 17 THE WITNESS: I don't know.
 18 BY MS. RONAYNE:
 19 Q All right. I'm not asking you to say what you did,
 20 I'm just asking if the allegations were that you
 21 disciplined your daughter with a belt and caused --
 22 just allegations.
 23 MR. POTTS: You may ask, but I'm --
 24 I'm going to pose a Constitutional protection on
 25 that.

1 concerned about it as well.
 2 BY MS. RONAYNE:
 3 Q Well, is this -- is this -- let me ask you. Did this
 4 rise to the level of court intervention by the local
 5 court in St. Louis that -- that does --
 6 MR. POTTS: Don't speculate if you
 7 don't know.
 8 THE WITNESS: I --
 9 MS. RONAYNE: Well, please don't
 10 testify for him.
 11 THE WITNESS: I don't know. I'm not
 12 sure.
 13 BY MS. RONAYNE:
 14 Q Did you go to court on it?
 15 A What court? What do you --
 16 Q Any court? Did you ever go to any court about these
 17 allegations that you disciplined Destiny
 18 physically --
 19 A I don't --
 20 Q -- with a belt?
 21 A So, what, would Family Court be --
 22 Q Yeah.
 23 A -- known as --
 24 MR. POTTS: If you know.
 25 THE WITNESS: Yeah, Family Court.

1 MS. RONAYNE: What's the
 2 Constitutional --
 3 MR. POTTS: He said I don't know.
 4 MS. RONAYNE: I'm not asking him to
 5 say what he did or didn't do.
 6 MR. POTTS: Anything that might lead
 7 to or otherwise we might be considered incriminating,
 8 I think he's got a right to circumfit (phone --
 9 MS. RONAYNE: I think he can tell me
 10 what the allegations are. That is not privilege with
 11 Amendment or otherwise.
 12 MR. POTTS: Well, I think that it is
 13 because he doesn't -- if he doesn't know.
 14 THE WITNESS: I don't.
 15 MR. POTTS: He's speculating and I
 16 think it's privilege.
 17 MS. RONAYNE: Well, he's not saying
 18 that.
 19 THE WITNESS: I just don't know.
 20 MR. POTTS: Well, I'm going to say
 21 it's privilege. It's absolute. So if somebody wants
 22 to take it -- you know, I don't know -- I don't know
 23 who the lawyer is. He doesn't seem to know that --
 24 the condition of the matter, so to avoid any kind of
 25 drift, and I think maybe you -- you might be

1 BY MS. RONAYNE:
 2 Q So you did go to Family Court, yes?
 3 A Yes, mm-hmm.
 4 Q And what was the outcome of that? Is it done? Is it
 5 pending?
 6 A I don't know.
 7 Q You -- you have no idea?
 8 A No, I don't know everything.
 9 Q Is that why Destiny doesn't live with you now?
 10 A Yes.
 11 Q When was the last time you were in the Family Court
 12 about this?
 13 A I can't remember the exact day. It was last year
 14 sometime.
 15 Q It don't have to be the last --
 16 A Last year sometime.
 17 Q The beginning? Do you know what season? Just
 18 approximate.
 19 A I can't remember. I really don't know. But I know
 20 it was in last year.
 21 Q You have no idea if it is was in January versus
 22 December?
 23 A Oh, I know it was not in January. But I really don't
 24 know what month it was.
 25 Q Okay.

1 A I don't.
 2 Q Is there any continuing court date?
 3 A I think there is, but I don't know when.
 4 Q Who would know that?
 5 A Michelle would know that.
 6 MR. POTTS: Do you have a lawyer in
 7 these proceedings?
 8 THE WITNESS: Yes.
 9 MR. POTTS: What's the lawyer's name?
 10 THE WITNESS: Mark.
 11 MR. POTTS: Do you got another name?
 12 THE WITNESS: Uh?
 13 MR. POTTS: Full name? Full name?
 14 THE WITNESS: His last name is
 15 skipping me. I don't always know his last name, but
 16 if you need me to, I can get that for you afterwards.
 17 BY MS. RONAYNE:
 18 Q Was he court-appointed or did you retain him?
 19 A I retained him. Mark --
 20 Q Did you retain him through JMMI or through your own
 21 personal checking account?
 22 A I don't --
 23 MR. POTTS: Objection, relevancy as
 24 to how he retained him. First of all --
 25 MS. RONAYNE: You can do --

1 MR. POTTS: And we preserve it and
 2 we'll see how we'll produce it. But I don't want to
 3 do that. I'm not trying to be obstructive.
 4 MS. RONAYNE: I know.
 5 MR. POTTS: I'm trying to protect his
 6 rights, and I think we ought to be very careful about
 7 not knowing what's going on in another jurisdiction
 8 when he doesn't know and he's got a lawyer.
 9 MS. RONAYNE: He seems to know.
 10 MR. POTTS: Well, he doesn't know. He
 11 doesn't know.
 12 MS. RONAYNE: I think he knows. He's
 13 already said he was -- it's alleged that he
 14 disciplined her for skipping class with a belt.
 15 That's pretty straight forward.
 16 BY MS. RONAYNE:
 17 Q On --
 18 MR. POTTS: Well, then that ought to
 19 be enough.
 20 MS. RONAYNE: Well, I'm not done.
 21 BY MS. RONAYNE:
 22 Q In April of 2014 you wrote a check for \$3,000 and
 23 another one for \$382 to the Marks Law Firm.
 24 A Mark --
 25 Q Which is a St. Louis law firm specializing in divorce

1 MR. POTTS: -- we don't know who this
 2 guy is.
 3 MS. RONAYNE: You can do relevancy,
 4 but I'm still asking --
 5 THE WITNESS: I don't know.
 6 MR. POTTS: First of all, this whole
 7 line of questioning's irrelevant.
 8 MS. RONAYNE: That's fine. Well, it
 9 certainly does matter when he has pronounced in his
 10 last deposition that Debbie Frazier's a fine mother.
 11 So the fact that he's involved --
 12 MR. POTTS: Well, that has nothing to
 13 do with his sense of his --
 14 MS. RONAYNE: Sure, it does.
 15 MR. POTTS: -- experience.
 16 MS. RONAYNE: Sure.
 17 MR. POTTS: It's opinion.
 18 MS. RONAYNE: Right.
 19 MR. POTTS: You can challenge his
 20 opinion, but you don't have to -- I -- I think this
 21 whole line of questioning --
 22 MS. RONAYNE: That could be.
 23 MR. POTTS: -- is really way out of
 24 line, frankly.
 25 MS. RONAYNE: Okay.

1 cases.
 2 A Okay.
 3 Q So is it his last name is Marks?
 4 A Okay, yeah, that probably was. Jonathon Marks, yes.
 5 That's his name now, good, exactly.
 6 Q And you retained him?
 7 A Mm-hmm.
 8 Q And JMMI wrote the check?
 9 A I don't know. I really don't know.
 10 Q I can show it to you as part of the discovery. So
 11 why would JMMI be paying for your personal legal
 12 fees?
 13 A I don't know.
 14 Q You don't know?
 15 A Mm-uh. I mean, I had -- you can ask Michelle. The
 16 financial board knows all the IRS laws and they know
 17 what to be done and not to be done so.
 18 Q They know the -- what did you say?
 19 A The IRS laws.
 20 Q IRS laws, was that what you said?
 21 A Yeah. I don't -- yeah.
 22 Q So Michelle knows the IRS laws?
 23 A Well, we have a firm who knows all of that. But it
 24 would be better to ask her because I don't --
 25 Q What firm are you talking about?

1 A I don't know, yeah.
 2 Q A law firm or an accounting firm?
 3 A Accounting firm.
 4 Q And you think the accounting firm --
 5 MR. POTTS: Well, clearly they can
 6 reconcile the distribution and give --
 7 MS. RONAYNE: I understand.
 8 THE WITNESS: Exactly, yeah. So I
 9 don't know how they're doing so I -- I can't answer
 10 on that.
 11 BY MS. RONAYNE:
 12 Q Well, I'm going to show you two checks.
 13 A Okay.
 14 Q Made out to Marks Law Firm and ask you if that is
 15 your signature on both of them?
 16 A Yes, of course.
 17 Q Okay. So you wrote the checks from an account that
 18 is Joshua Media Ministries --
 19 A Do it say that on --
 20 Q -- expense account.
 21 A Where are you saying?
 22 Q Right there.
 23 A Yes, mm-hmm.
 24 Q So you wrote the checks to Marks Law Firm, signed the
 25 check from a JMMI expense account?

1 A Yeah. I think I signed the checks but, like I say,
 2 Michelle would know better what these went for.
 3 Q You don't know what they went for?
 4 A No. I mean, well, I see what they went for, but,
 5 like I say, it would be better to ask her because I
 6 don't know. I have checks signed so they can deal
 7 with business or whatever, so I don't know how
 8 they're all allocating everything so it would be
 9 better to ask her.
 10 Q But you acknowledge that you signed this check to
 11 Marks --
 12 A Yes.
 13 Q -- from an expense account at JMMI?
 14 A Yes, mm-hmm.
 15 Q Who is attorney Jeff Weisman?
 16 A I'm not -- that name isn't registering with me.
 17 Q JMMI paid a retainer of \$2,000 to him in September.
 18 A I don't know.
 19 Q You have no idea?
 20 A No.
 21 Q Would that be a check you also signed?
 22 A I don't know. I mean, any checks that go out that me
 23 or my board can sign, then I'm not always notified on
 24 every intricate detail of where the check is going.
 25 I have trusted people who make sure that is done.

1 Q Who has signatory power on the check -- checking
 2 account?
 3 A I know I'm one of them. I don't know everybody we
 4 do.
 5 Q You don't know all the people that are authorized to
 6 sign checks?
 7 A No. I know one of them.
 8 Q What is Miracles in America?
 9 A It's -- it's the name of the crusades I do in the
 10 American country.
 11 Q Say that again.
 12 A It's the name of the crusades that I do in the
 13 American country.
 14 Q In the American country?
 15 A Mm-hmm.
 16 Q What does that mean? What American country?
 17 A Well, that -- what we're on right now.
 18 Q Are you talking about the United States?
 19 A The United States of America, yeah.
 20 Q So Miracles in America is the crusade?
 21 A Yes, the name of the crusade. It's a title theme.
 22 Q Title theme? And what -- tell me about it.
 23 A Well, it's just a campaign I do to love sick people.
 24 (Inaudible, cell phone ringing.)
 25 MS. RONAYNE: Do you want to take a

1 minute.
 2 MR. POTTS: Can I do this, it's Rich?
 3 MS. RONAYNE: Yeah. Go ahead.
 4 MR. POTTS: Hey, Ricky.
 5 VIDEOGRAPHER: We are going off the
 6 record --
 7 MS. RONAYNE: Yes.
 8 VIDEOGRAPHER: -- at 11:54 a.m.
 9 (WHEREUPON, a brief recess was held on
 10 the record at 11:54 a.m. to 12:12 p.m.)
 11 VIDEOGRAPHER: We are back on the
 12 record, it is 12:12 p.m.
 13 MS. RONAYNE: Ready?
 14 THE WITNESS: Yes.
 15 BY MS. RONAYNE:
 16 Q All right. We were talking about Miracles in
 17 America. So explain to me what that is.
 18 A It's a -- it's a ministry outreach of -- that
 19 minister to hurting people.
 20 Q What do you mean hurting people?
 21 A Sick people, people on drugs who are in kind of a
 22 form of hurt, emotional, mental, physical.
 23 Q So what does the ministry do?
 24 A Pray for people. Feed the poor.
 25 Q Where do you feed the poor?

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- 1 A Well, we was doing it out of the building in Taylor
2 up until last year.
- 3 Q Until --
- 4 A The beginning part of last year.
- 5 Q Until early 2014?
- 6 A Yeah, I think so. Yeah.
- 7 Q And why did it stop?
- 8 A It's just that we needed new structure of people to
9 run that part because the people who we had running
10 it left and went to another place.
- 11 Q So does Miracle -- Miracles in America, is that a
12 separate banking account?
- 13 A Miracles in America?
- 14 Q Right.
- 15 A I don't remember. I don't -- I don't understand.
- 16 Q You don't understand?
- 17 A Well, I mean, I don't understand the question
18 totally.
- 19 Q Does Miracles in America have a separate banking
20 account from JMMI?
- 21 A Not that I know -- I know of, maybe -- probably you
22 need to ask Michelle, she would know.
- 23 Q So do -- when you say it's a crusade, tell me what a
24 crusade is.
- 25 A It's just a campaign.

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- 1 Q What does a campaign mean?
- 2 A A campaign is a -- a -- a purposeful ministry
3 endeavor to achieve a -- a specific objective.
- 4 Q So is it a request for money?
- 5 A No, it was not. That's not what the campaign is for.
6 It's -- the campaign is to help hurting people.
- 7 Q So what do you do to help hurting people?
- 8 A Well, we pray for the sick. We --
- 9 Q When you say we, who are you talking about?
- 10 A Well, the whole organization.
- 11 Q So do you ask for donations to help --
- 12 A Oh, of course. Yeah.
- 13 Q Okay.
- 14 A Donations, that's normal in a charity.
- 15 Q So you ask for a donation --
- 16 A Mm-hmm.
- 17 Q -- and then you pray for these people that you think
18 are hurting?
- 19 A Mm-hmm. No, that ain't how we do it.
- 20 Q Okay. Well, tell me. I'm trying to figure this out.
- 21 A Well, I mean, our objective is to help hurting people
22 and in the process, you know, when most of that's
23 finished, we give people an opportunity to donate to
24 the ministry.
- 25 Q You mean when --

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- 1 A Like every other ministry does in church.
- 2 Q Okay. What do you mean when it's finished?
- 3 A Well --
- 4 Q I don't understand this so you're going to have to
5 explain it.
- 6 A Mm-hmm.
- 7 Q You say when it's finished then you give them an
8 opportunity to donate?
- 9 A Yeah. When I -- when we finish helping them, or
10 whatever, we give people opportunity to give and
11 donate to the ministry.
- 12 Q So are you talking about at a specific gathering, for
13 example, the Taylor --
- 14 A Mm-hmm.
- 15 Q You have to answer yes or no.
- 16 A Yes, uh-huh.
- 17 Q That you -- what, you call people up who need to be
18 helped, is that what you're talking about?
- 19 A I don't know if it's just calling people up who need
20 to be helped. Only we -- we have X people to come --
21 if they need help, prayer, needs to come up. But
22 that ain't normally just the way we're flowing that.
23 But --
- 24 Q Well, tell me what you do in Miracles in America
25 that's different from your normal ministry?

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- 1 A Well, there are many ministries that does what we do.
2 I mean --
- 3 Q I just want to know about yours.
- 4 A Yeah. Well, I mean, it's normal, they pray for the
5 sick just like every pastor does in a church, they
6 pray for sick members and people who are hurting.
- 7 Q So you say after you've helped them, is that -- are
8 you saying you helped them at one meeting, is that
9 what it would be?
- 10 A Well, we have multiple meetings so we offer
11 counseling and all kind of other forms of ministry.
12 Drug rehab.
- 13 Q You offer drug rehab?
- 14 A Mm-hmm.
- 15 Q Where?
- 16 A There at the Taylor building.
- 17 Q You run a drug rehab?
- 18 A Well, not -- not something for -- more along the
19 spiritual lines of counseling and helping them to get
20 off that kind of life, you know.
- 21 Q Who does the counseling?
- 22 A I think her name is Mary Jessikee (phonetic).
- 23 Q Mary?
- 24 A Jessikee.
- 25 Q How do you spell that?

- 1 A I don't know.
- 2 Q Jessikee?
- 3 A Mm-hmm.
- 4 Q And she offers drug rehab counseling?
- 5 A Yes.
- 6 Q Is she a certified drug rehab counselor?
- 7 A No. I don't know. But it's just ministry. I don't
- 8 -- I think you are getting more technical into the
- 9 legal aspect of it where I'm talking about spiritual
- 10 ministry and giving people advice to stop using drugs
- 11 and to pray for them that they will be free from
- 12 that.
- 13 Q Is she a minister?
- 14 A Yeah, mm-hmm.
- 15 Q She is a minister?
- 16 A Yes.
- 17 Q With what organization?
- 18 A Well, she's with us, but I don't know if she -- if
- 19 it's an organization she's a part of.
- 20 Q She's a minister with JMMI?
- 21 A Yes, mm-hmm. She's part of the church that's leasing
- 22 the building from us.
- 23 Q Oh, she's part of the church -- the Taylor church
- 24 that leases the building. So that's JMMI, though?
- 25 A No, mm-uh.

- 1 Q Okay. So it's not part of JMMI? This is something
- 2 that is done independently through the people that
- 3 lease the building from you in Taylor?
- 4 A No. No. This is JMMI that has put that in place and
- 5 I let ministers from that church be a part of it.
- 6 Q So do you pay for that?
- 7 A Pay? I'm sorry. What do you mean?
- 8 Q What do you mean you put it in place? Do you pay for
- 9 it in some fashion?
- 10 A I don't understand what you're asking. That don't
- 11 make sense.
- 12 Q Well, I mean, it -- it costs money to run these
- 13 things so who -- who --
- 14 A Of course, I mean, I -- JMMI pays for the overhead of
- 15 -- I mean, whatever happens in that building so.
- 16 Q Don't they lease it from you?
- 17 A We lease it --
- 18 Q Don't they pay you?
- 19 A Yeah, but not normally, you know, it's sporadically.
- 20 Q What do you mean not normally?
- 21 A Well, I don't -- I don't make them stick to that, you
- 22 know, if -- if there are things that the church need
- 23 I -- I'll waive that fee, you know, so.
- 24 Q So you have the ability to waive fees of the Taylor
- 25 church that leases from you?

- 1 A Yeah, of course. Yeah.
- 2 Q What's the name of that church?
- 3 A Kingdom Family Church.
- 4 Q So that's not run by JMMI?
- 5 A Actually, no, it's a separate entity. It's run by
- 6 KFC.
- 7 Q What's KFC?
- 8 A Kingdom Family Church.
- 9 Q Okay. So they're -- they are separate unto
- 10 themselves?
- 11 A Yes. They're just a part of the movement, you know.
- 12 Q I don't know.
- 13 A Okay. Well, JMMI is a movement. It's a global
- 14 movement, and there are a lot of churches who are a
- 15 part -- around the world is a part of what we do, and
- 16 they're one of the churches that do -- they happen to
- 17 be leasing the building from us.
- 18 Q All right. So when you say that there is a drug
- 19 rehab component, you're referring to that's Kingdom
- 20 Family Church, that's not JMMI?
- 21 A Well, no, that's not Kingdom Family Church. That is
- 22 JMMI.
- 23 Q So J --
- 24 A We just have somebody from KFC, who is a minister,
- 25 that we allow to run that.

- 1 Q Are you on the board of Kingdom Family Church?
- 2 A Yes.
- 3 Q In what capacity?
- 4 A I -- I don't know. I know I'm on the board, but I --
- 5 I don't know what official title that you will say.
- 6 Q So you're saying that the drug rehab ministry that
- 7 runs out of the Taylor building is JMMI and not KFC?
- 8 A Right.
- 9 Q Does Debbie Frazier participate in that?
- 10 A Not that I know of.
- 11 Q She's not working with the drug rehab part?
- 12 A That I know of.
- 13 Q Are there any other ministries that you say are run
- 14 out of the Taylor that are JMMI's obligation or --
- 15 A No.
- 16 Q No? Just the drug rehab?
- 17 A Right.
- 18 Q All right. So when you say Miracles in America,
- 19 you've claimed that you can cure cancer?
- 20 A No, I've never claimed I can cure cancer.
- 21 Q No? Have you brought people up to the front when
- 22 you're preaching and laid your hands on them --
- 23 A Yes, mm-hmm.
- 24 Q -- and cured them?
- 25 A The Lord does it through me. It's not me that's --

1 Q Okay. So the Lord does it through you?
 2 A Right.
 3 Q So has the Lord ever, through you, cured cancer?
 4 A Yes.
 5 Q Yes?
 6 A Mm-hmm.
 7 Q And how many times do you think that's happened?
 8 A I don't know. I haven't kept --
 9 Q So let me -- procedurally, let me see. So would the
 10 scenario be that you bring people up that you say are
 11 sick in some -- or hurting in some fashion --
 12 A Mm-hmm.
 13 Q -- and you lay your hands on them and through the
 14 Lord they're cured and that's when you ask them to
 15 make contributions because you've helped them?
 16 A No.
 17 Q Okay. Explain it to me then.
 18 A Well, I mean, there are people who come that are sick
 19 and they all know basically what I say that I'm not
 20 the one who has the power to cure you, God do, but as
 21 ministers he's given us the obligation and
 22 responsibility to pray for the sick to see them heal
 23 -- that they may be healed. I can't -- I can't say
 24 if they completely will be or not, I'm not the one
 25 who makes the decision, God does, or whatever. But I

1 do my job to pray for them and as a result of doing
 2 that basically there are some that are healed, some
 3 that are not so.
 4 Q What kinds of ailments are healed? Are there people
 5 that come up on -- on crutches and are able to walk
 6 away?
 7 A Yeah.
 8 Q People that come up in wheelchairs and are able to
 9 get up and walk?
 10 A Right.
 11 Q And do you know these people before they come up and
 12 approach you?
 13 A No.
 14 Q Anybody at JMMI know them?
 15 A Not that I know of.
 16 Q So you're saying that of all the -- the ministries of
 17 the world, you've been selected to lay your hands on
 18 these folks and to cure them of their physical
 19 ailments through God?
 20 A Well, Catholics lay hands on sick people. They don't
 21 all --
 22 Q They do not say that they have cured them, though.
 23 A Oh, no. I mean, they pray. I didn't say I cure
 24 them. I say I pray for them.
 25 Q You say that the Lord does it through you, that's

1 what you said.
 2 A Yeah. He does it through others, too --
 3 Q Okay.
 4 A -- not just me.
 5 Q Can you name some other people that have done this?
 6 A Catholics do it.
 7 Q Catholics don't.
 8 A They do.
 9 Q I'm Catholic. It doesn't happen.
 10 A No. You're -- you're a part -- you're a part of a
 11 certain Catholic. There are Catholics who do that.
 12 Q Who believe that they can cure physical illnesses by
 13 laying their hands on them --
 14 A No. You're --
 15 Q -- through God?
 16 A Yeah, you're misquoting that again. They're not
 17 saying that they can do it, but they believe in
 18 prayer.
 19 Q Through --
 20 A They believe in prayer.
 21 Q Well, okay, so are you saying that all you do is pray
 22 and that these people end up being cured?
 23 A Some of them, yeah.
 24 Q Can you give me some people that have been?
 25 A I can't.

1 Q And so, then, after you've -- is that -- is that what
 2 you're referring to, the Miracles in America, is that
 3 part --
 4 A Mm-hmm
 5 Q -- where you bring them up and lay your hands on them
 6 and pray, that's the miracles part?
 7 A Yes.
 8 Q Okay. That's the campaign?
 9 A Mm-hmm.
 10 Q And then you were -- and then you say if you've been
 11 cured you should donate?
 12 A No.
 13 Q Or consider donating?
 14 A No.
 15 Q No? I thought you said after --
 16 A The heal --
 17 Q -- the people that you've helped --
 18 A The healing is not a part of any money donations.
 19 The -- the -- the donation and financial part is more
 20 of me asking for support to continue these kind of
 21 meetings to get broader and reachable people.
 22 Q I thought you had said that after these people have
 23 been helped that -- after you've --
 24 A I was just stating the -- the -- the succession or
 25 whatever. It has nothing to do with the way you're

1 trying to word that, you know, about the --
 2 Q Well, you're -- feel free to reword it. I'm just
 3 trying to --
 4 A Well, I --
 5 MR. POTTS: Just answer the question.
 6 You don't have to paraphrase or anything.
 7 THE WITNESS: Okay. Yeah, I'm just
 8 saying that's what happens.
 9 BY MS. RONAYNE:
 10 Q Is that you call people up, you lay your hands on
 11 them, you believe that through you the Lord cures
 12 them?
 13 MR. POTTS: I think this question's
 14 been asked and answered at least a dozen times.
 15 MS. RONAYNE: Okay.
 16 MR. POTTS: So we're not going to do
 17 it again.
 18 BY MS. RONAYNE:
 19 Q And that -- and then at some point -- at the end of
 20 this service, you ask for donations?
 21 A Yes.
 22 Q Okay.
 23 A Sometimes, yeah.
 24 Q There has been some talk among your ministry that
 25 you're able to cure AIDS. Is that something you --

1 not you, personally, but through the Lord, have you
 2 ever been able to cure AIDS through the Lord?
 3 A Yes.
 4 Q You have?
 5 A Mm-hmm.
 6 Q And when did that happen?
 7 A This has happened at different times over the years.
 8 Q Do you have any proof?
 9 A It is verified by doctors, yeah.
 10 Q And is this in St. Louis or here or --
 11 A Just different places.
 12 Q Just different places. And then do you go to the
 13 follow-up doctors' appointment with these people and
 14 see that their --
 15 A No. I don't have time to do all --
 16 Q -- blood work is --
 17 A I don't have time to do all that. I let them do
 18 that.
 19 Q How do you know --
 20 A Because if -- if the Lord heals them, then it should
 21 show in the medical report.
 22 Q How do you know they're cured?
 23 A Well, those who are, they come back with doctor
 24 reports -- statements, and they give witness to it.
 25 The people give witness to it, not, you know, not me.

1 Q So they come back and report that they were cured?
 2 A Mm-hmm.
 3 Q Have you ever, through the Lord, cured -- cured a
 4 blind person?
 5 A Yes.
 6 Q And where did that occur?
 7 A Well, it's happened in different places over the
 8 years.
 9 Q So, so many times that you can count?
 10 A No, I can't.
 11 Q And what about people that were crippled, who were
 12 unable to walk, the same thing?
 13 A Right.
 14 Q And then do these people follow you around to your
 15 crusades and ministries?
 16 A Some end up -- do, yeah. But we just -- mainly just
 17 get a whole new group of people because it's not a
 18 church, it's more of, you know, a place where they
 19 come to get ministered to, you know, and go back out.
 20 Q How do you receive your donations?
 21 A How do I receive them?
 22 Q Right. How do you go about asking them and funding
 23 this?
 24 A I ask them to give.
 25 Q Who? How?

1 A The people who are there in my meetings.
 2 Q So the people that are in your meetings, you request
 3 funds from them?
 4 A Yeah, I ask them to so.
 5 Q So when you're having a -- what do you call the -- a
 6 service of some sort in Taylor, then you ask for
 7 financial contributions?
 8 A Yes.
 9 Q Are there any -- any other outreach for financial
 10 contributions other than at the time of the service?
 11 A Of course, yeah. There are financial campaigns that
 12 go on all the time.
 13 Q All right. Tell me about that.
 14 A Okay. What do you mean now? What do you mean?
 15 Q What do you mean by financial campaign?
 16 A Well, I mean, like at the end of a service I'll ask
 17 people if they want to donate and give to this
 18 ministry, then let them do that. When I'm traveling
 19 to different places I do the same thing. So that's
 20 all part of the financial aspect of our ministry, how
 21 we receive finances.
 22 Q Right. So I ask you other --
 23 A And in the mail. Donate --
 24 Q Okay.
 25 A Sending mail to us.

1 Q Tell me about that.

2 A Well, we just send mail out, letters, tapes,

3 products, you know, and we give people the

4 opportunity to give, my mailing list, people who have

5 been supporters.

6 Q I'm sorry.

7 A People who have been supporters --

8 Q You give people an opportunity and I didn't hear what

9 you said.

10 A Yeah. To donate, mm-hmm.

11 Q So do you send them products and tapes without their

12 asking --

13 A Well --

14 Q -- and hope they pay you?

15 A No. Sometimes we just give them out free. We give a

16 lot of things out free.

17 Q And then hope that they'll donate in appreciation?

18 A Well, the gift is not in hope that they'll donate.

19 We just ask people, standardly, to give to the

20 ministry because of the ongoing vision of what we're

21 trying to do around the world.

22 Q What's the ongoing vision?

23 A Well, to reach the world and America through media,

24 television, and all kind of other minister

25 outreaches.

1 Q So that's when you -- but you said that you had a

2 dream.

3 A Yes, I did.

4 Q Okay. No, not that dream. A dream later that you

5 were supposed to tell somebody something?

6 A I don't --

7 Q And you claimed privilege during that.

8 A I don't -- you have to be more specific. I'm not

9 quite sure what you're --

10 Q Okay. Let's see.

11 MR. POTTS: Do you want to refresh his

12 recollection, is that what --

13 MS. RONAYNE: I'm going to read it

14 into the transcript. I'm just trying to find out

15 which is the best parts to pick, and I'll -- I'll

16 give you this so you can look at it.

17 BY MS. RONAYNE:

18 Q So this -- at the last deposition we were talking

19 about your face-to-face visits with Jesus.

20 A Okay.

21 Q And you answered before 2010, 2007, and then I asked

22 you where it is -- and I'll show this to you, you can

23 review this -- and said you were asleep in a dream.

24 And I asked where you were sleeping, and you said,

25 "St. Louis, at your residence," and you said, "Mm-

1 Q Reach them to say what?

2 A I'm sorry. Reach --

3 Q What do you want to reach them about?

4 A Oh, I want to tell them about the Lord Jesus Christ.

5 Q Where do you get your mailing list? How do you know

6 who to send mail to?

7 A Just people who -- who gives us their mailing list or

8 their information through the service.

9 Q How do they do that? Oh, it's from people that are

10 in the service?

11 A Yes. Will call into the office or whatever.

12 Q How do they know to call -- how do they know about

13 you to call?

14 A From TV outlets and different exposure through media

15 outlets.

16 Q Your previous testimony, and the judge specifically

17 in her opinion said you had to answer this: You said

18 that Jesus appeared to you in a dream --

19 A Mm-hmm.

20 Q -- in St. Louis of 2007. Can you tell me about that

21 dream?

22 A In 2007? No. I said he appeared to me when I got

23 saved in 1989 when I was 17 years old.

24 Q Is this when you were in culinary school?

25 A No. I was in the 12th grade.

1 hmm."

2 And I said, "What was that experience

3 like?" And you said, "Well, he just basically

4 appeared to me and showed me something that he wanted

5 me to say." And then when I asked you to explain it,

6 you said, "It's private, it's priestly." And the

7 Judge, in her opinion, said that you had to answer

8 that.

9 MR. POTTS: Well, she don't say that.

10 She said she had -- he had to answer a certain

11 classification of questions, not a specific question.

12 MS. RONAYNE: That -- including that

13 one.

14 MR. POTTS: No, it doesn't say

15 anything about that. But I will tell you, you can

16 answer that question as long as it doesn't relate to

17 any communications --

18 THE WITNESS: Mm-hmm.

19 MR. POTTS: -- confidences, anything

20 that is necessary to your relationship with the

21 party --

22 MS. RONAYNE: Right.

23 MR. POTTS: -- in an (inaudible) --

24 MS. RONAYNE: Penitent further --

25 MR. POTTS: -- the plaintiff in this

1 action which is another party. But as to those kinds
 2 of generic things, go ahead.
 3 THE WITNESS: Yeah. Basically, he
 4 spoke to me about our country, America, and --
 5 BY MS. RONAYNE:
 6 Q Now, you -- you said very specifically that it was --
 7 and telling you to tell somebody else that, and you
 8 didn't want to disclose who it was or what it was
 9 about, not about the country. It wasn't something in
 10 general --
 11 MR. POTTS: Well, you said he invoked
 12 the privilege and not say anything about it.
 13 MS. RONAYNE: No. He said --
 14 MR. POTTS: I thought he said -- you
 15 said he wouldn't tell.
 16 THE WITNESS: I don't remember. What
 17 you're reading --
 18 MR. POTTS: Hold on one second. My
 19 mic fell off.
 20 THE WITNESS: Yeah.
 21 MR. POTTS: I got to rewire it. Thank
 22 you. I'm sorry.
 23 BY MS. RONAYNE:
 24 Q Here's what -- it says in the transcript, "Well, he
 25 just basically appeared to me and showed me something

1 wanted me to say to somebody.
 2 Q Okay. Who is the somebody?
 3 A I guess the kind of talking it is, it's country, you
 4 know, from Memphis, Tennessee. So when I say
 5 somebody --
 6 Q No.
 7 A -- I don't mean one person, I mean --
 8 Q Okay. So --
 9 A -- a group of people that he wants to say it to.
 10 Q -- it wasn't --
 11 A -- a specific person, no. It's a group of people,
 12 not a country.
 13 Q Well, see, it's interesting, because later I say,
 14 "I'm asking you what Jesus said to you in the dream?"
 15 And you said, "I can't tell you. It's for a person."
 16 A Yes.
 17 Q That I --
 18 A Oh, did I say person?
 19 Q Yeah, you said person, right here.
 20 A I don't remember saying that. I don't know if you
 21 got that right.
 22 Q Well, it's not me. It's the transcript.
 23 A Right.
 24 Q "I can't tell you. It's for a person." Do you want
 25 to read that?

1 that he wanted me to say." And then you say, "He
 2 basically appeared to me to share what he wanted me
 3 to say to somebody. And I said, "Can you tell me
 4 what that is?" And he said, "It's private. It's
 5 priestly." So that's what I'm asking you.
 6 MR. POTTS: He's going to answer that
 7 question.
 8 MS. RONAYNE: Okay.
 9 MR. POTTS: He will.
 10 BY MS. RONAYNE:
 11 Q So who were you supposed to --
 12 A I was -- I --
 13 Q What -- who is the somebody that you were supposed to
 14 say something to?
 15 A I don't remember it being one specific person as
 16 you're wording it. It was --
 17 Q Well, it's not how I worded it. You can read your
 18 answer right there and read it into the record.
 19 A I understand what you're saying --
 20 Q Would you please read this, sir.
 21 A Yeah. I've already read it. Oh, you want me to say
 22 physically.
 23 Q Yeah.
 24 A He basically appeared to me to show -- he basically
 25 appeared to me to show -- to me to share what he

1 A What I meant is personal, yeah. "I can't tell you.
 2 It's for a person," that I -- I don't remember that,
 3 but --
 4 Q Okay. So, now, you're changing that story.
 5 A No.
 6 MR. POTTS: No. He's expanding on --
 7 THE WITNESS: I'm explaining.
 8 MR. POTTS: -- it to answer the
 9 question.
 10 MS. RONAYNE: I want the record --
 11 THE WITNESS: It's personal.
 12 MS. RONAYNE: I'll let the record
 13 speak for itself.
 14 THE WITNESS: Yeah.
 15 MR. POTTS: You may. But now you're
 16 asking him to -- ask what he meant. Because he
 17 invoked the penitent privilege, I'm saying go ahead,
 18 he'll now explain it. It's not related to any
 19 confidential communications with any individual.
 20 MS. RONAYNE: Right. So I'm not sure
 21 why you interrupted because --
 22 MR. POTTS: No, no, no. I'm --
 23 BY MS. RONAYNE:
 24 Q Your testimony is that it was for somebody.
 25 MR. POTTS: Well, you can argue that

1 all you want. I'm going to let him answer the
 2 question as it doesn't relate to any particular
 3 communication with any --
 4 MS. RONAYNE: It's a dream.
 5 MR. POTTS: It's a dream.
 6 MS. RONAYNE: It's not a
 7 communication. Right, and in there, if you read the
 8 opinion, dreams are not privileged. Not privileged,
 9 clearly.
 10 MR. POTTS: I'm not asserting. It's
 11 his opinion.
 12 MS. RONAYNE: Okay. But he should
 13 just answer.
 14 MR. POTTS: He's trying to and you
 15 don't like the answer.
 16 THE WITNESS: Right.
 17 MS. RONAYNE: No.
 18 BY MS. RONAYNE:
 19 Q You interrupted when I said so you're changing what
 20 the testimony is before when you said I had -- I
 21 wanted to -- or I was told by Jesus to talk to
 22 somebody. Now you're saying -- or to tell somebody
 23 something. Now you're saying that's not what it was.
 24 A Well, you know, I'm expounding upon what I was trying
 25 to say. It's not changing it. You just -- whatever

1 is written there, I just didn't have the time I'm
 2 having now to explain what I'm saying. It was
 3 personal. It something personal for a group of
 4 people.
 5 Q Okay. Tell me what do you mean by that?
 6 A Well, I mean, there are things that, you know, the
 7 Lord wants to say to, you know, certain groups of
 8 people in our country.
 9 Q Well, what -- what group and what did he say in the
 10 dream?
 11 A Well, he begin to speak to me about, you know, them
 12 giving their life to him.
 13 Q Them being?
 14 A And repenting of their sins. They're just sinners.
 15 Q So just in general?
 16 A Mm-hmm.
 17 Q You have to say yes or no.
 18 A But that's a group -- yes, mm-hmm. But that's a
 19 group --
 20 Q So it wasn't any specific group that God -- you're
 21 saying that God just appeared to you and said people
 22 need to repent for their sins?
 23 A Yes. I mean, that is a specific group.
 24 Q Aren't we all sinners?
 25 A Sinners saved by grace is one group, and there are

1 sinners who will just -- they don't know God and they
 2 are not -- they're not trying to live for God at all,
 3 so those are the people we want to reach, help them.
 4 Q The sinners that are not repentant?
 5 A Right.
 6 Q So God appeared to you and said what?
 7 A That's what he said.
 8 Q -- about this group?
 9 A He just said for me to tell them that he was the son
 10 of God, that he had risen from the dead, and that he
 11 died for their sins.
 12 Q Do you claim to be a prophet?
 13 A Yeah, that's one of my calls.
 14 Q One of your?
 15 A One of my calls, yeah.
 16 Q Calls?
 17 A Mm-hmm.
 18 Q What does that mean? What does it mean to be a
 19 prophet?
 20 A There's a spokesperson for God, a messenger.
 21 Q So you believe you have direct communication with
 22 God?
 23 A Yes.
 24 Q You posted a video on the Internet in 2014 and it was
 25 about the Super Bowl --

1 A Mm-hmm.
 2 Q -- and you said, and this is a quote, "It was shown
 3 to me that the Denver Broncos are going to win the
 4 Super Bowl," end of quote.
 5 A Mm-hmm.
 6 Q Then you went on to say, quote, "I understand by the
 7 spirit, the interpretation of these dreams, and I
 8 know them to be true," end of quote. And then
 9 further went on to say, as a quote, "The holy spirit
 10 has borne witness to me that the Broncos are going to
 11 win," end of quote.
 12 A Mm-hmm.
 13 Q Did the Broncos win?
 14 A No.
 15 Q Did you take that video down?
 16 A Oh, of course, yeah.
 17 Q Because it was wrong?
 18 A Yes. That was a -- really a miscommunication.
 19 Q Between whom?
 20 A Someone had a dream they gave me and I tried to
 21 interpret it and thought that I had help from God in
 22 doing that and -- and it's obviously that I didn't,
 23 so just like other prophets in the Bible who missed
 24 it at times, I missed that. So it was --
 25 Q Other prophets have missed things like Super Bowls.

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- 1 A Not Super Bowls, we're talking about things --
- 2 Q Did --
- 3 A -- they miscommunicated messages God gave them and
- 4 they made mistakes, too.
- 5 Q But not about Super Bowls, or that kind of secular
- 6 kind of --
- 7 A No, God is -- God is in everything.
- 8 Q God's even in the Super Bowl?
- 9 A No. God is just in everything. Wherever people are,
- 10 he's there.
- 11 Q So --
- 12 A Yeah.
- 13 Q -- you think that --
- 14 A But that wasn't about -- to prophesize (sic) about a
- 15 Super Bowl, that was basically to show people that as
- 16 the -- who was that? The guy who won the cup? He
- 17 even testified how he had a dream that he would win
- 18 and he did win in this last -- in the thing that was
- 19 in Brazil I think that -- the huge World Cup or -- I
- 20 forget what it is, but anyway, I -- you know, my
- 21 point was trying to show that God speaks to people in
- 22 dreams but the dream the person had was not accurate
- 23 so.
- 24 Q Was --
- 25 A But the dreams I have are very accurate.

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- 1 Q Okay. So who is the dreamer?
- 2 A This was just -- I don't remember who it was. It was
- 3 -- it was something sent in to me and I was --
- 4 Q Was being sent in to?
- 5 A -- to interpret. It was sent in by email.
- 6 Q Somebody sent you --
- 7 A Somebody's dream -- yeah. Someone sent me a dream by
- 8 email.
- 9 Q So you didn't meet this person?
- 10 A I knew of them. But I'm trying to remember if it was
- 11 them who had it or they were saying that they had a
- 12 friend who told them and they really believed it
- 13 and --
- 14 Q You just pass on somebody saying something to
- 15 somebody who's saying something and it becomes a
- 16 prophecy from God?
- 17 A Well -- no. I have reputable people who have
- 18 dreamed.
- 19 Q Reputable people?
- 20 A Yeah. Who have dreamed accurately so sometimes I
- 21 trust their word. Unlike, in this case, I -- I don't
- 22 think I should have used my global platform to do
- 23 that, so, anyway.
- 24 Q Did you --
- 25 A Mm-hmm.

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- 1 Q -- post any sort of explanation about why this wasn't
- 2 accurate?
- 3 A Of course, mm-hmm.
- 4 Q You did?
- 5 A I apologized, mm-hmm.
- 6 Q I don't see that -- I looked. I don't see that
- 7 posting. How long was that up?
- 8 A It was up a long time. It's still out there.
- 9 Q You think there's a posting, then tell me what it
- 10 says.
- 11 A I just explained to the people my heart, what I was
- 12 trying to do and how I misguided that -- that
- 13 communication and so -- and told them I was sorry.
- 14 But they've known my track record to be accurate,
- 15 that they know that I wasn't giving the dream. They
- 16 know when I'm -- I have a dream and prophesize it's
- 17 accurate. But I explained to them that I was trying
- 18 to actually be, I guess, open to hearing God through
- 19 other people, interpreting what they saw.
- 20 Q Even when it comes to football games?
- 21 A It don't matter what it is. It could be anything.
- 22 Q You said on the video that it was shown to you that
- 23 the Denver Broncos were going to win.
- 24 A No, I didn't say --
- 25 Q Yeah, that's what you said. That's a quote.

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- 1 A -- completely -- listen to me. I specifically told
- 2 them that the dream came from somebody else and as a
- 3 interpreter of that dream I felt that God was showing
- 4 me that. Which I've said to you that I missed that
- 5 point. I thought God was helping me to communicate
- 6 that and I was wrong about that so.
- 7 Q Well, you went on to say -- and this is a quote, "I
- 8 understand by the spirit, the interpretations of
- 9 these dreams, and I know them to be true," that's end
- 10 of quote. And then another quote, "The whole spirit
- 11 has borne witness to me that the Broncos are going to
- 12 win," end of quote.
- 13 A Mm-hmm, yeah.
- 14 Q You said those things?
- 15 A Of course.
- 16 Q Of course?
- 17 A Yeah.
- 18 Q Okay. So the holy spirit bore witness to you. Tell
- 19 me how that happened.
- 20 A It was wrong so it wasn't the holy spirit so why are
- 21 we still going over this question?
- 22 Q You don't get to ask questions, you get to answer.
- 23 A I'm just telling you, you're being redundant. It
- 24 don't make no sense.
- 25 Q No.

1 A I've shared what happened.
 2 Q Excuse me. If you -- you put on -- on the whole
 3 world-wide Internet that the holy spirit has borne
 4 witness to you that the Broncos are going to win,
 5 right?
 6 A Yeah.
 7 Q Okay. And why is this funny?
 8 A You're just funny.
 9 MR. POTTS: Let me make an objection.
 10 MS. RONAYNE: I understand, you're
 11 going to object to --
 12 MR. POTTS: I'm sure somewhere in this
 13 line of questioning there's some nexus, your motion
 14 to either modify child support, change alimony, or
 15 somehow deal with custody and parenting time.
 16 MS. RONAYNE: Right.
 17 MR. POTTS: It's a little bit tenuous
 18 in my --
 19 MS. RONAYNE: Well, I understand
 20 that's your opinion.
 21 MR. POTTS: Well, it's an objection.
 22 MS. RONAYNE: Okay.
 23 MR. POTTS: But this -- there's no
 24 reason --
 25 MS. RONAYNE: I understand you've got

1 MR. POTTS: Is he recording these
 2 conversations?
 3 MS. RONAYNE: No, he's playing her --
 4 MR. POTTS: That's another thing. I
 5 certainly hope he's not because it's violating --
 6 MS. RONAYNE: He's not.
 7 MR. POTTS: -- of criminal statutes if
 8 he's tape-recording these conversations and he's now
 9 playing it.
 10 MS. RONAYNE: Look it, I don't want
 11 that put on the record.
 12 MR. POTTS: No, I'm just making a
 13 statement.
 14 MS. RONAYNE: Some accusation --
 15 MR. POTTS: I'm not.
 16 MS. RONAYNE: -- that my client is
 17 violating a criminal statute.
 18 MR. POTTS: I'm not. I just want to
 19 know, he just played something off a recording and I
 20 don't know where --
 21 MS. RONAYNE: He's playing your
 22 client's --
 23 MR. POTTS: We don't know that.
 24 MS. RONAYNE: -- vision that the Super
 25 Bowl was going to be won by the Broncos.

1 an ongoing --
 2 MR. POTTS: -- more than relevant.
 3 And I understand that, so, go ahead and answer.
 4 MS. RONAYNE: Why --
 5 MR. POTTS: There's got to be a point
 6 in time where this becomes argumentative, and
 7 therefore we're wasting time.
 8 MS. RONAYNE: Right.
 9 MR. POTTS: Time is money, and I have
 10 no objection. No opinion --
 11 MS. RONAYNE: I understand.
 12 MR. POTTS: --we're trying to be as
 13 accommodating as we can, but, you know, I -- I could
 14 say they pass the plate in my church and they take
 15 collections, and I know they do it in the Catholic
 16 churches.
 17 MS. RONAYNE: I'm not asking you and
 18 you haven't taken --
 19 MR. POTTS: Your opinion is --
 20 MS. RONAYNE: -- \$1.4 million from a
 21 woman who has now --
 22 MR. POTTS: But you know what --
 23 MS. RONAYNE: Turn that down.
 24 (WHEREUPON, an audio recording begins
 25 to play.)

1 MR. POTTS: I don't know that.
 2 MR. FRAZIER: Do you want me to again?
 3 MS. RONAYNE: Sure. Play it again.
 4 MR. POTTS: I don't want to hear it.
 5 MS. RONAYNE: Well, then don't --
 6 MR. POTTS: His presentation --
 7 (WHEREUPON, audio recording plays
 8 again.)
 9 MR. POTTS: It is playing. You know,
 10 we don't have to do this.
 11 MS. RONAYNE: Well, you're -- and he's
 12 showing you what he -- what is --
 13 MR. POTTS: I don't care what he's
 14 playing.
 15 THE WITNESS: It's fine. I mean, it's
 16 old.
 17 MR. POTTS: It's fine. I believe we
 18 don't --
 19 MS. RONAYNE: He just said it happens
 20 to be me that was shown the dreams in this.
 21 THE WITNESS: I didn't say that. You
 22 didn't --
 23 MR. POTTS: You know what?
 24 THE WITNESS: Yes.
 25 MR. POTTS: Don't.

1 THE WITNESS: Okay.
 2 MR. POTTS: Don't be argumentative.
 3 THE WITNESS: I won't.
 4 MR. POTTS: You're not supposed to ask
 5 questions.
 6 THE WITNESS: Okay.
 7 MR. POTTS: You answer, no matter how
 8 absurd --
 9 THE WITNESS: Okay.
 10 MR. POTTS: -- tangential --
 11 THE WITNESS: Okay.
 12 MR. POTTS: -- elongated, irrelevant,
 13 or otherwise burdensome they are.
 14 THE WITNESS: Okay.
 15 MR. POTTS: You just answer the
 16 questions and we'll move through this.
 17 THE WITNESS: Okay.
 18 BY MS. RONAYNE:
 19 Q Okay. What's a false prophet?
 20 A Well, first of all, what a false prophet is not is
 21 not someone who won't miss the prophecy.
 22 Q I'm sorry. What?
 23 A A false prophet --
 24 Q You had a lot of negatives in there.
 25 A No. I said a false prophet is not somebody who don't

1 miss a prophecy, number one, that's what they're not.
 2 What they are is someone who have deviated from
 3 following God, that's the real meaning of a false
 4 prophet.
 5 Q According to you?
 6 A No. According to the Bible.
 7 Q The Bible says that's what a false prophet is?
 8 A Yes. Anyone who deviates from following God and
 9 misleading people to follow the Lord. They don't say
 10 that a false prophet is someone who don't have false
 11 -- because obviously a lot false prophets have --
 12 Q No, not false. But people that claim to know things,
 13 for example, in the future who is going to win a
 14 Super Bowl and are wrong, isn't that a false prophet?
 15 A No, that's not what the Bible preaches. Mm-uh.
 16 Q What does the Bible teach on that?
 17 A The Bible just teaches that a false prophet is
 18 someone who do not turn people to God.
 19 Q And what cite do you have for that?
 20 A I'm sorry.
 21 Q What cite -- what biblical cite, you said it's in the
 22 Bible.
 23 A It's in the Bible.
 24 Q Right. Where?
 25 A If you read -- I can't give you all the scriptures

1 right now.
 2 Q You don't know the scripture?
 3 A I do know them but I can't give you point and verse,
 4 I've got to go through the Concordance and show you
 5 where they are.
 6 Q So you wouldn't say it's a false prophet to go on the
 7 Internet and claim to have heard from God what the
 8 outcome of something was going to be and -- and have
 9 it be completely wrong, and that's not a false
 10 prophecy?
 11 A No. That's a false prophecy, but not a false
 12 prophet.
 13 Q Okay. So people can make a lot of false prophecies
 14 and you don't think they're false prophets?
 15 A And the reason why I would believe that is because,
 16 you know, there are people who are sincere and
 17 they're trying to hear from God and they can miss God
 18 according to where the development of their gift is
 19 so.
 20 Q Okay. So let's -- we were doing this in the last
 21 deposition about -- in your book you state you have
 22 seen Jesus face-to-face a thousand times.
 23 A Mm-hmm.
 24 Q In your last deposition you could only state a couple
 25 and they were in a dream. So how many times have you

1 actually seen Jesus?
 2 A I don't --
 3 Q Face-to-face?
 4 A I don't know. It's just been so many times over 20
 5 years.
 6 Q Tell me what happens when you see Jesus face-to-face?
 7 A Well --
 8 Q Has it been over a thousand times?
 9 A It's been -- yes. Many times.
 10 Q Pardon me?
 11 A Yes.
 12 Q It's been over a thousand times?
 13 A Yes.
 14 Q Okay. So when you see Jesus face-to-face, describe
 15 where -- give me an example of one.
 16 A Well, I mean, when I first saw him in a dream in --
 17 at 17 in the 12th grade year.
 18 Q Okay. The next one?
 19 A I mean, what do you want? How many do you want me to
 20 list?
 21 Q As many as you can.
 22 A There's so many. Many, many different times I can't
 23 really go through all of them, but it's just --
 24 Q So many times you can't list them? Give me another
 25 example.

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- 1 A I mean, my book "Face-to-Face" lists a lot of them
2 so.
- 3 Q Well, you wrote the book, I assume?
- 4 A Yes.
- 5 Q Okay. So tell me what's in the book. How many
6 places and times have you seen them? Are they always
7 dreams?
- 8 A A lot of them are dreams.
- 9 Q Do you ever sit down in communication with him?
- 10 A Usually we're standing in the dream. He's relaying a
11 message to me.
- 12 Q Only in dreams?
- 13 A Mostly in dreams.
- 14 Q What about the clouds?
- 15 A Yes. Well, not from the clouds, you know, I never
16 say he spoke to me from the cloud.
- 17 Q Never in the clouds?
- 18 A No. In dreams in the physical realm here.
- 19 Q From the physical realm here. So tell me about
20 those.
- 21 A Well, he just comes unannounced and then he tells me
22 what he wants to say and then he leaves.
- 23 Q So you're saying he -- he sits in the physical realm
24 with you and talks to you?
- 25 A Not sit.

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- 1 Q Stands. He stands in a room with you and converses
2 in the physical realm?
- 3 A (Indicating.)
- 4 Q You have to answer out loud.
- 5 A Yes, mm-hmm.
- 6 Q Tell me what that's about. Where did that occur?
- 7 A Just different places if I'm fasting and praying in
8 the church. He does it just like he did Paul in the
9 Bible, came in the physical realm and talk to --
- 10 Q So you're equating yourself with Paul in the Bible?
- 11 A No, not equating.
- 12 Q Okay.
- 13 A It's just -- I'm equating the same experience, not
14 the same person.
- 15 Q Okay. So give me an example of where it occurred and
16 when, that you saw him in the physical presence like
17 you just said.
- 18 A Well, I just shared with you when I'm fasting and
19 praying in the church.
- 20 Q He comes in?
- 21 A He has.
- 22 Q Has anybody else seen him?
- 23 A No, I'm by myself.
- 24 Q So nobody else can see him or they just didn't happen
25 to see him?

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- 1 A What are you saying again? What context? Are you
2 talking about when he comes to me or if he's separate
3 going to them personal? What are you saying? What
4 are you saying?
- 5 Q I'm saying when the two of you are talking and having
6 your -- your visit and someone else walks in, will
7 they see him?
- 8 A Oh, yeah, I mean, it's possible. But that didn't
9 happen so.
- 10 Q It's never happened that someone else saw him while
11 you were seeing him?
- 12 A No.
- 13 Q So no one else could verify this?
- 14 A No.
- 15 Q So give me an example of where you were and what
16 approximate time, very specifically, when you saw him
17 face-to-face in the physical realm.
- 18 A Well, I can't give you a time. I just know I was in
19 the church and --
- 20 Q What church?
- 21 A A church in Port Huron I go to to pray. So it was --
- 22 Q What's the name of that --
- 23 A -- in 2010. New Covenant Fellowship.
- 24 Q And what happened?
- 25 A Well, he just appeared to me and told me, you know, a

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- 1 few things that he wanted me to share with his
2 people.
- 3 Q And what is that?
- 4 A There's just so much, you want to sit here and listen
5 to the whole thing?
- 6 Q Sure. Yeah.
- 7 A Yeah, well, basically, you know, just certain
8 spiritual laws concerning the word of God, his word.
- 9 Q What does that mean?
- 10 A Well, it's factors about using his power to love
11 people that -- to help them basically.
- 12 Q Have there been any physical encounters since 2010?
- 13 A Yes, there has.
- 14 Q And when's that?
- 15 A In '12.
- 16 Q Okay.
- 17 A Okay.
- 18 Q Where was that?
- 19 A It was also in the church.
- 20 Q Which church?
- 21 A The same church.
- 22 Q The Port Huron church?
- 23 A Mm-hmm.
- 24 Q And what occurred there?
- 25 A Basically him sharing another message of what he

1 wanted me to share.
 2 Q And what is that?
 3 A This one was different, it was more concerning what
 4 he wanted me to do in America.
 5 Q And what did he want you to do in America?
 6 A Basically to hold crusades and to tell people about
 7 the Gospel and what he did for them 2,000 years ago.
 8 Q So this was a big vision that he shared with you?
 9 A Yes.
 10 Q And you were standing up in the church in Port Huron?
 11 A Well, I was on my knees, but, yes.
 12 Q But I thought you both stood up?
 13 A I told you he stands.
 14 MS. RONAYNE: Oh, okay. We got to
 15 stop.
 16 THE WITNESS: Okay.
 17 MS. RONAYNE: He's changing the disc.
 18 VIDEOGRAPHER: We are going off the
 19 record, it is 12:57 p.m.
 20 (WHEREUPON, a brief recess was held at
 21 12:57 p.m. to 12:58 p.m.)
 22 VIDEOGRAPHER: We are back on the
 23 record, it is 12:58 p.m.
 24 MS. RONAYNE: I just inquired what
 25 people wanted to do in terms of lunch, it's one

1 time?
 2 A Yeah, she works full-time.
 3 Q And who is Christian Ware?
 4 A That's their child.
 5 Q And how old is that child?
 6 A I'm not sure. I don't know.
 7 Q Infant or teenager? In between?
 8 A No. I know he's definitely not a teenager. Young,
 9 very young so.
 10 Q And who is Clifton Ware?
 11 A That's her husband.
 12 Q Are you related to them?
 13 A No.
 14 Q No -- no biological relation?
 15 A No.
 16 Q Did they live with you in 2013?
 17 A No, not in '13. No.
 18 Q When -- did they live with you at any time?
 19 A Yes. They did when they first came and that was more
 20 in 2008, '09. Somewhere around there.
 21 Q What do you mean when they --
 22 A When they first came --
 23 Q First came from where?
 24 A From Cleveland, Ohio, and I helped them out and their
 25 children.

1 o'clock. Mr. Potts, do you have any --
 2 MR. POTTS: I suggest we be back here
 3 at two o'clock.
 4 MS. RONAYNE: I don't object. Okay.
 5 That's fine.
 6 VIDEOGRAPHER: We are going off the
 7 record, it is 12:58 p.m.
 8 (WHEREUPON, a recess was held at 12:58
 9 p.m. to 2:29 p.m.)
 10 VIDEOGRAPHER: We are back on the
 11 record. It is 2:29 p.m.
 12 MS. RONAYNE: Mr. Taylor, you are
 13 still under oath.
 14 THE WITNESS: Yes.
 15 MS. RONAYNE: You understand?
 16 MR. POTTS: Can you hold ten seconds
 17 so I can sign this and him have maybe -- I can wait.
 18 MS. RONAYNE: Go ahead. I don't care.
 19 (WHEREUPON, a brief pause was held on
 20 the record.)
 21 BY MS. RONAYNE:
 22 Q Mr. Taylor, who is Ashely Ware?
 23 A She's a volunteer staff that works in the ministry on
 24 the side.
 25 Q She's a volunteer. Does she work full-time or part-

1 Q Children or one?
 2 A Well, they had more than one so.
 3 Q And so they lived with you?
 4 A Yeah.
 5 Q In your apartment?
 6 A Yes.
 7 Q The two bedroom apartment?
 8 A Mm-hmm.
 9 Q You have to answer yes.
 10 A Yes, mm-hmm.
 11 Q Along with your two children?
 12 A Well, you know, my two children weren't there every
 13 day so -- according to the court order.
 14 Q So --
 15 A So I have my children half the week.
 16 Q So where would these folks stay every day?
 17 A Well, they had -- I also had other friends in the
 18 city that I allowed them to go stay with and they
 19 opened their home --
 20 Q You allowed them to go?
 21 A When they opened their home to them.
 22 Q What do you mean you allowed them to go?
 23 A You just misworded it.
 24 Q Okay.
 25 A Mm-hmm.

1 Q On your 2012 tax return -- or who's Brooklyn
 2 Mitchell?
 3 A Brooklyn? I don't know.
 4 Q You don't remember who Brooklyn Mitchell is?
 5 A No, mm-uh.
 6 Q You have no idea?
 7 A No.
 8 Q Never heard of that person?
 9 A No. Brooklyn Mitchell? Nope.
 10 Q On your 2012 tax return you claimed Brooklyn Mitchell
 11 as a dependent through an exemption.
 12 A No, I don't think that's true or accurate.
 13 Q Well, this is what you gave us today.
 14 A Yeah. Or it's -- I don't know if it's -- that must
 15 be someone -- I don't know who that is. Michelle
 16 probably can answer that. I'm not sure about this
 17 because I don't do my own taxes so. But I did carry
 18 them because I supported them that year so. I mean,
 19 I know I carried -- supported Clifton and his wife
 20 and their children. I helped them.
 21 Q But you have no idea who Brooklyn Mitchell is?
 22 A No, I don't -- I don't know that name and I don't
 23 know why that's there so -- it could be something
 24 that I'm not aware of.
 25 Q You wouldn't be aware that they were one of your

1 exemptions and dependencies?
 2 A Well, I don't know. I didn't handle that so I would
 3 rather you ask her about that. Michelle.
 4 Q Ask her about your personal tax return?
 5 A Yes.
 6 Q And --
 7 A I don't fill them out.
 8 Q You said that Christian, Ashely, and Clifton did not
 9 live with you in 2012?
 10 A No. Not in '12, I don't think. I'm not sure. I
 11 can't -- maybe my days are mixed up so I'm not
 12 accurate.
 13 Q Well, you said it was back in '08 and '09, not '12.
 14 A I know -- I know it was '08, '09 -- I can remember
 15 those times. Yeah.
 16 Q But you, under oath, claimed all these people as your
 17 exemptions?
 18 A Of course.
 19 Q Brooklyn -- of course?
 20 A Well, no, I mean, whatever happened in this was under
 21 oath and it was the truth, so, like I say, you need
 22 to go ask Michelle about this.
 23 Q No, I mean, it's your life. You're -- hold on.
 24 A It may be mine, but I have somebody taking care of
 25 this part.

1 Q Okay. So these folks -- none of those four folks
 2 lived with you in 2012?
 3 A That's not true.
 4 Q And in 2013?
 5 A I don't -- I don't remember. I don't know which --
 6 what I'm looking at so I can't answer this.
 7 Q What's your -- okay. Okay.
 8 A I can't answer it.
 9 Q It's 1040 U.S. Individual Income Tax Return 2012 --
 10 A I know --
 11 Q -- is it not?
 12 A Yes, I know what this is.
 13 Q And this was given to me --
 14 A Mm-hmm.
 15 Q -- by your attorney today.
 16 A Okay.
 17 Q And on it it has these four dependency exemptions,
 18 does it not?
 19 A Yes.
 20 Q Brooklyn, Christian, Ashley, and Clifton?
 21 A Yes.
 22 Q Okay. And you're telling me you have no idea who
 23 Brooklyn Mitchell is?
 24 A No. I -- it may be a name in there -- I don't know
 25 if I know their nickname or whatever, I'm just

1 telling you I don't know, so I'm not going to answer
 2 anymore on that.
 3 Q All right. So who was it that you support? What is
 4 it that you do to support these people then?
 5 A Well, I mean, they didn't have a job, they didn't
 6 have nowhere to stay so I provided food and clothing,
 7 shelter, for them.
 8 (WHEREUPON, a cell phone begins
 9 ringing.)
 10 MS. RONAYNE: I don't know whose
 11 phone that is.
 12 THE WITNESS: That's mine.
 13 BY MS. RONAYNE:
 14 Q So you provided to these four people food, clothing,
 15 and shelter?
 16 A Mm-hmm.
 17 Q You have to answer yes or no.
 18 A Yes, mm-hmm.
 19 Q On your salary?
 20 A Yes.
 21 Q And your salary is listed as \$28,897.
 22 A Yes, mm-hmm.
 23 Q And on that salary you're saying you supported these
 24 four people?
 25 A Yes.

1 Q These four people?
 2 A Yes.
 3 Q Including Brooklyn, who you don't know?
 4 A Yes. I don't -- like I say, I can't answer certain
 5 things at this time because someone takes care of my
 6 1040. But, you know, I have money saved up, you
 7 know, so I can -- I can spend that money on helping
 8 other people if I want.
 9 Q How is the money saved up after you're earning
 10 28,000? Where do you get money to save up?
 11 A Well, I save money from my paycheck so, so.
 12 Q Is that because the ministry covers most of your
 13 overhead?
 14 A Yeah.
 15 Q With your allowances?
 16 A That's the -- that's the -- that's the blessing of
 17 non-profit ministry.
 18 Q Is what?
 19 A They let -- allow for different allowances that even
 20 though my salary may be low, I still can have a
 21 little bit extra to help a family like that so.
 22 Q But your allowances, like your -- your car allowance
 23 and your housing allowances, those are taxable to
 24 you, aren't they?
 25 MR. POTTS: If he knows. He's not an

1 A Pay their rent? I mean, they were living with me, so
 2 I --
 3 Q Not in 2012 you say or '13, that was in '08 and '09.
 4 A No, I don't pay their rent. No.
 5 Q So you don't pay their rent.
 6 A Mm-uh.
 7 Q Do you give them a check for some funds?
 8 A No.
 9 Q No check?
 10 A Mm-uh.
 11 Q No check, cash, but not large amounts, you don't pay
 12 their rent. Do you buy them food?
 13 A Yes, mm-hmm.
 14 Q When do you buy food? How does that work? Do you
 15 give them money or do you go out and do their grocery
 16 shopping?
 17 A No, I just give them money.
 18 Q Cash?
 19 A My card. Bank card.
 20 Q Credit cards?
 21 A Banking, debit card or -- you know, but when are you
 22 saying I do this because I don't do this now.
 23 Q Well, this was 2012 and 2013.
 24 A Okay. You keep asking me for those years.
 25 Q Right.

1 expert.
 2 THE WITNESS: I don't know. Yeah, I
 3 don't know all that stuff.
 4 BY MS. RONAYNE:
 5 Q Do you report those on your taxes?
 6 A I don't know if I'm supposed to. I don't know.
 7 Q You have no idea? Well, you signed --
 8 A I have other people handle this for me.
 9 Q But you sign your tax returns, don't you?
 10 A I have to, don't I? I think, yeah.
 11 Q Okay. And you sign them and you're not sure of what
 12 they mean?
 13 A Not so much. I have professional people who know
 14 what they're doing so.
 15 Q Who would the professional people be?
 16 A I don't know, you can ask Michelle.
 17 Q She knows who prepares your taxes?
 18 A Yes.
 19 Q Do you keep receipts for all the expenditures that
 20 you say you have for these folks? These followers?
 21 A I'm not sure. I'm not positive.
 22 Q When you give them support, do you give them cash?
 23 A I have helped them with cash before, but nothing
 24 large, no.
 25 Q Do you pay their rent?

1 A You're asking --
 2 Q When you claimed them.
 3 A Yeah, well, that's probably the way I did it when I
 4 did do it.
 5 Q That's probably the way you did it?
 6 A Maybe. I have cash. I have debit -- debit card.
 7 Q You would hand them your debit card?
 8 A Yeah.
 9 Q To go spend?
 10 A Yeah.
 11 Q Okay. And how much do you think they used on your
 12 debit card?
 13 A I don't know.
 14 Q Was it your personal debit card or JMMI's?
 15 A Most likely it was my personal card.
 16 Q Most likely, but maybe not?
 17 A Yes. No, I think it was my personal card.
 18 Q Not JMMI's?
 19 A Mm-uh.
 20 Q You have to answer yes or no.
 21 A The only time they used JMMI card is on ministry
 22 business, and they were handling a lot of ministry
 23 business so that's separate.
 24 Q So were they being given money from the ministry's
 25 debit card if they were doing ministry business?

1 A Yeah, of course. And any time any volunteer does
 2 anything on the ministry business, you know, they are
 3 able to -- like if they are going out of town,
 4 whatever, they're able to buy food because the
 5 ministry takes care of all those expenses. It's
 6 normal.
 7 Q So the ministry does but not you personally?
 8 A Like I said, on ministry business, that's when the
 9 card is used.
 10 Q Okay.
 11 A When it's something personal, I've helped them with
 12 my own money.
 13 Q So are you saying that you provided more than 50
 14 percent of the support for these four people?
 15 A I -- yeah, of course. I mean, they didn't have
 16 nowhere to stay, nothing --
 17 Q But you didn't pay their rent? Do you know where
 18 they were living?
 19 A Pay their rent? What are you saying?
 20 Q I asked you if you paid their rent and you said no.
 21 A No, I mean, they live with me, right. Are you
 22 talking about the times that they live with me?
 23 Q I'm only talking about '12 and '13?
 24 A Oh, okay. No, no, of course not. I don't --
 25 Q Of course not, what?

1 percent of their support?
 2 A Mm-hmm.
 3 Q So you claimed them as exemptions but you can't tell
 4 me how?
 5 A Actually, I will like to say I don't know, ask
 6 Michelle. That's all I will --
 7 Q She would know what you spent daily on these folks?
 8 A They will know because they handle all my personal
 9 and ministry stuff.
 10 Q Who's they, when you say they?
 11 A Well, I mean, Michelle handles all personal and
 12 ministry so.
 13 Q How much have you personally donated to JMMI in the
 14 last five years?
 15 MR. POTTS: If you know.
 16 BY MS. RONAYNE:
 17 Q Approximately, that's okay.
 18 A I don't -- I don't really know. Yeah, I can't say,
 19 from all the sacrifices I can't say.
 20 Q What does that mean from all the sacrifices?
 21 A I mean, the sacrifices of, you know, giving up
 22 things.
 23 Q No, no. I'm talking about financially, not --
 24 A Oh, no.
 25 MR. POTTS: Money.

1 A I don't -- I didn't pay their rent --
 2 Q Okay.
 3 A -- from my --
 4 Q But to claim them you have to provide a certain level
 5 of support. So are you saying that you spent or --
 6 I'm sorry -- that you supported them in more than 50
 7 percent of their expenses?
 8 A It has to be if it's on that thing.
 9 Q But you can't tell me how or anything about it?
 10 A Yeah, I don't handle all those things anymore. I'm
 11 -- I'm totally out of that, so I would rather you ask
 12 someone who knows. I'd rather just say to you I
 13 don't know so there's no proprietorship of me --
 14 MR. POTTS: There's a tax preparer
 15 name on the return.
 16 BY MS. RONAYNE:
 17 Q Okay. But what I'm -- what I'm trying to figure out
 18 -- and I don't want to depose him. I want to just
 19 get a handle on this. You're saying that this is not
 20 JMMI expenditures?
 21 A Mm-hmm.
 22 Q These are personal expenditures that you
 23 personally --
 24 A No.
 25 Q Let me finish. That you personally paid more than 50

1 THE WITNESS: So -- no, I can't tell
 2 you.
 3 BY MS. RONAYNE:
 4 Q But you do tell people how much you've given, don't
 5 you?
 6 A I have told them the sacrifices I've made.
 7 Q You put a dollar amount on that, haven't you?
 8 A Oh, sometimes I -- I've given up -- yes, I've told
 9 them that over years I have given a large sum of
 10 money to this ministry.
 11 Q Okay. So what sum of money do you say when you do
 12 that?
 13 A Well, you said in dollar amount. I'm talking about
 14 sacrifices.
 15 Q No, you put a dollar amount on it when you talk.
 16 A I know, because it is a dollar amount.
 17 Q Okay. So, then, tell me what dollar amount you use
 18 when you tell people?
 19 A Oh, millions. I've given up millions for this.
 20 Q Given up --
 21 A Sacrifices.
 22 Q -- or -- oh, only in sacrifice?
 23 A In sacrifice, yes.
 24 Q Millions?
 25 A Yes.

- 1 Q How do you arrive at that figure?
- 2 A Well, I mean, from the opportunities I've had to do
- 3 other things and that kind of thing.
- 4 Q That would have paid you over a million -- that would
- 5 have paid you millions?
- 6 A Way more than millions.
- 7 Q Really?
- 8 A Yes, of course.
- 9 Q What kinds of things would those be?
- 10 A Well, for number one, I'm a chef. I completed my --
- 11 in college, a degree, and so I could, number one,
- 12 have my own business, like my brother, who's a chef,
- 13 does, and that alone could bring --
- 14 Q Is he a millionaire?
- 15 A No, but --
- 16 Q Chef's usually aren't.
- 17 A That's if they don't write books and do multiple
- 18 chains. There's a way you can do it where I know a
- 19 lot of my friends can have different --
- 20 Q But you said you've said -- you used the word donate,
- 21 you haven't used the word sacrifice. When you're
- 22 talking on your --
- 23 A well, that's what I --
- 24 Q Wait, let me finish.
- 25 A Okay.

- 1 Q When you're talking on your radio or your conference
- 2 call or up on stage, you say, "I have donated
- 3 millions to JMMI."
- 4 A That's right.
- 5 Q But you're not talking dollar amount?
- 6 A No. And the people know what I'm talking about.
- 7 Q Oh, you think they understand?
- 8 A Oh, because I've explained, of course. You can't
- 9 just listen to one show that I do and expect to
- 10 understand what I'm saying if you don't follow --
- 11 Q Well, I've listened to more than one show.
- 12 A Well, you've got to listen to more than three, four,
- 13 20 or a hundred to hear everything, yeah.
- 14 Q The JMMI contribution report for 2013 shows that you
- 15 donated \$42,000 to JMMI in 2013. Is that true?
- 16 A If that's what the report says.
- 17 Q How can you donate more than you actually have made
- 18 in the last several years after a bankruptcy?
- 19 A Because in this kind of ministry people will walk up
- 20 to me and want to give me personal gifts of this
- 21 amount of money and I give it over to the ministry
- 22 instead of receiving it, and I have them write it out
- 23 to the ministry instead of me.
- 24 Q So you're saying that if -- isn't that a double dip
- 25 if you're saying that people go up and give you money

- 1 and you say write it to the ministry, and then you
- 2 get credit for that donation as does the person who
- 3 made it?
- 4 A Well, you know, that's my personal way of showing
- 5 also contribution. But people who want to give me
- 6 money personally for my life and I just tell them to
- 7 give it to the ministry.
- 8 Q Do you report that as gift income to you?
- 9 A No, because I tell them to write it out to the
- 10 ministry.
- 11 Q So how do you come up with \$42,000 that you donated
- 12 when it didn't come from you, it came from a third-
- 13 party?
- 14 A Well, we use those records to show. But I am, you
- 15 know, besides my ties and offerings that I give out
- 16 of my paycheck to show just, kind of what, is being
- 17 given to me on a yearly basis or presented to me
- 18 actually. So, you know, sometimes it's higher or
- 19 lower but --
- 20 Q Do people come up and give you cash?
- 21 A No.
- 22 Q Never cash?
- 23 A No.
- 24 Q Do they write a check out to you, David Taylor?
- 25 A They have, but I don't receive it. I tell them to

- 1 scratch it out and write it in the ministry's name.
- 2 Q But then you get credit for the \$42,000?
- 3 A To show that I -- I channel that money there instead
- 4 of to myself.
- 5 Q So you're saying you don't accept cash?
- 6 A No.
- 7 Q If somebody were to give cash who would it go to?
- 8 A JMMI.
- 9 Q Personally? I mean --
- 10 A JMMI.
- 11 Q But who?
- 12 A The offering bucket. Offering place. I don't --
- 13 Q Well, if somebody's going to give you \$5,000 in cash,
- 14 who would that be handed to?
- 15 A The people who take up the money and count the money,
- 16 and that could be anybody.
- 17 Q What if it wasn't -- do you think -- I'm not talking
- 18 about somebody putting in a donation bucket.
- 19 A Yeah.
- 20 Q I'm talking about somebody who's got \$5,000 cash and
- 21 they want to give it to JMMI. Who would be the
- 22 person that would be designated to receive that kind
- 23 of donation?
- 24 A Well, our financial committee, Michele is over that
- 25 so you could just say her. Her.

1 Q So Michelle would be who was designated to receive
 2 cash donations of a large amount?
 3 A Yeah, to put it in the ministry. Yeah. That's
 4 really -- I don't know how to answer that question.
 5 Q Why?
 6 A I really don't, because mostly it don't -- people
 7 don't give like that. They give in to the offering
 8 plate. They never give it to us personally. They
 9 give in to our envelopes and they -- or if they're
 10 going to put cash, they give it in the bucket. So,
 11 honestly, I think we should scratch that. We've
 12 never received money like that. The money we receive
 13 comes through donation plates, and then it's taken in
 14 the back and counted and deposited in the ministry.
 15 Q So it would have to be at a service?
 16 A Yes.
 17 Q So when Debbie gave you a couple -- you know, 1.2
 18 million or wherever we are on that, she did it at a
 19 service?
 20 A I don't -- I don't recall. I'm not quite sure when
 21 -- I know she gave a wire.
 22 Q Yeah.
 23 A What I know it's a wire so.
 24 Q A wire transfer?
 25 A Yeah. And people --

1 Q So how --
 2 A People do that all the time in our ministry.
 3 Q So how would that be that that would be set up? Who
 4 would be doing that at your ministry?
 5 A I know Michelle is over that.
 6 Q So did you talk to Debbie about this wire transfer?
 7 A No, Michelle.
 8 Q You had no conversation with Debbie about that?
 9 A No.
 10 Q Did you ever request or in any way talk to Debbie
 11 about contributions to the ministry?
 12 A No. I mean, I talk to everybody who comes to the
 13 meeting about that, so that will be yes.
 14 Q Well, other than at the general meeting, did you have
 15 any smaller group conversations with her about money?
 16 A Really, no.
 17 Q None?
 18 A No, not that I know of. Other than when she had
 19 already given money and that she wanted to give so I
 20 had Michelle finish up talking to her about that.
 21 Q So you did talk to her after she had given money?
 22 A Yeah, mm-hmm. I wanted to know what was going on and
 23 so Michelle filled me in and I talked with her
 24 briefly, you know.
 25 Q So what did Michelle tell you?

1 A Just that she wanted to donate and that she had given
 2 the wire and that kind of thing.
 3 Q And so, then, you talked to Debbie?
 4 A Yeah.
 5 Q And what did you say to Debbie?
 6 A I just told her thank you and I was -- I did, you
 7 know, the ministry would appreciate that.
 8 Q Did you inquire of her the source of those funds?
 9 A No, because I never usually do that when people give
 10 money like that.
 11 Q Would it be a concern to you if it meant that she was
 12 ultimately going to be homeless in the next year?
 13 Would it be a concern to you?
 14 A Of course, I would never have allowed that. I didn't
 15 find out until afterwards.
 16 Q What did you find out?
 17 A I just -- what you was telling me, you know
 18 (indicating).
 19 Q What Mr. Potts shared with you?
 20 A Mm-hmm, right.
 21 Q Anybody else?
 22 A Rick, of course, came up to me in the first court
 23 proceedings and started saying stuff like that but I
 24 didn't believe him because of his kind of spirited
 25 character, yeah, so I didn't really take nothing he

1 said true. But when Mr. Potts shared with me certain
 2 things because I did -- I saw this whatever had
 3 happened.
 4 Q And what was your understanding of what had happened?
 5 A That she had donated a large sum and she gave a lot
 6 of money that she didn't really -- a lot of it she
 7 didn't have to give. I mean, besides the stuff she
 8 has to pay for.
 9 Q I'm sorry. Say that again.
 10 A I said that I found out that she gave a lot of her
 11 money that she didn't have to give, she couldn't
 12 afford a lot of that.
 13 Q Did Debbie ever talk to you about her finances?
 14 A No. That's the thing, I --
 15 Q Did she ever talk to Michelle, if you know?
 16 A No.
 17 Q Did you have any understanding of what her financial
 18 wherewithal was?
 19 A No, I sure didn't.
 20 Q Do you understand there's a court order that says she
 21 can't give any money to JMML or any other --
 22 MR. POTTS: If you know.
 23 MS. RONAYNE: I said did you know.
 24 THE WITNESS: No.
 25 BY MS. RONAYNE:

1 Q You are aware of the court order?
 2 A No.
 3 Q The court order says she can't give you any money.
 4 A No, that's just what's --
 5 Q No, it's been in effect for a long time.
 6 A Okay. No, I didn't know that.
 7 Q Okay. She didn't tell you that?
 8 A No.
 9 Q Did Debbie tell you that she was not seeing her
 10 children or severely cut back seeing her children
 11 based on her finances?
 12 A No.
 13 Q She didn't share anything about that with you?
 14 A The only thing I found out through Michelle, that she
 15 had told Michelle is just that what her ex-husband
 16 was doing to her.
 17 Q And what was that?
 18 A Well, basically trying -- just keeping her from the
 19 children, took them with a written order.
 20 Q You understand he can't do that personally but the
 21 court has to issue orders?
 22 MR. POTTS: Irrelevant.
 23 THE WITNESS: (Inaudible).
 24 MS. RONAYNE: Well --
 25 MR. POTTS: Who cares. That's --

1 MS. RONAYNE: No, I want his
 2 understanding.
 3 MR. POTTS: For what purpose?
 4 MS. RONAYNE: So that Debbie doesn't
 5 repeat --
 6 MR. POTTS: Debbie's not on trial
 7 here.
 8 MS. RONAYNE: No. He said --
 9 MR. POTTS: He's not on trial here.
 10 MS. RONAYNE: It's not about trial.
 11 MR. POTTS: What's it for?
 12 BY MS. RONAYNE:
 13 Q Do you understand there are court orders issued from
 14 the Judge about Debbie's parenting time?
 15 MR. POTTS: If you know.
 16 THE WITNESS: No, I don't. I'm not
 17 involved in that.
 18 BY MS. RONAYNE:
 19 Q So you were led to believe that somehow her ex-
 20 husband Rick is doing this?
 21 A Yeah.
 22 Q Okay. Did Debbie ever tell you that she had violated
 23 court orders?
 24 A No, I don't know.
 25 Q She didn't tell you anything about that?

1 A No.
 2 Q Do you know if she told Michelle?
 3 A I don't know. You can ask Michelle.
 4 Q All right. Given -- and you understand that Mrs.
 5 Frazier cashed out about \$600,000 in retirement
 6 assets that generated a very significant IRS bill?
 7 Are you aware of that?
 8 A No. After he told me.
 9 Q You weren't aware of it before then?
 10 A No, of course not.
 11 Q But you're now aware that she's got a big IRS bill?
 12 A Yeah, I would never have let her give that if I knew
 13 that.
 14 Q Were you aware at one time she owned her house free
 15 and clear?
 16 A No.
 17 Q Are you aware that because she's given everything
 18 else away that she now has a significant mortgage
 19 that means she doesn't have any equity in her house
 20 anymore?
 21 A I think I heard from Mr. Potts or Michelle, one, that
 22 she's, I guess, got a lot of credit off her home to
 23 pay lawyers through what the situation that her ex-
 24 husband has taken up. So that's -- that's all I know
 25 about that.

1 Q Do you know she also had to pay taxes, though, on
 2 these?
 3 A Yeah, I would never have let her give that to the
 4 ministry if I had known she'd pay taxes. I teach
 5 people to pay taxes, pay their taxes to the
 6 government so.
 7 Q That's one of your tenants?
 8 A Hmm?
 9 Q That's one of your tenants, to pay your taxes?
 10 A Yes, mm-hmm.
 11 Q Would you accept any more money from Debbie Frazier?
 12 A No.
 13 Q You would not?
 14 A No.
 15 Q Going forward?
 16 A Right.
 17 Q Have you told her that?
 18 A Of course. I mean, since I found this out I had a
 19 phone conversation and just told her, you know, to --
 20 I just asked her why she didn't tell us, you know,
 21 all of these things.
 22 Q And what'd she say?
 23 A She just felt like she didn't feel like she needed to
 24 tell me anything. She just felt led to give the
 25 money so.

1 Q So you called her on her cell phone or house phone?
 2 A No. I had my -- Michelle called her for me and
 3 patched me in.
 4 Q Okay. So you and Michelle were sort of on a
 5 conference call with her?
 6 A Yeah, mm-hmm.
 7 Q Okay.
 8 A Just recently.
 9 Q When would that have been?
 10 A Maybe in the last week or two, something like that.
 11 Q So you had a conversation where you told Debbie
 12 you're not going to take any more money from her?
 13 A Yeah. Well, I don't think I worded it like that, but
 14 I told her that she shouldn't have -- she should have
 15 communicated better with her financial situation and
 16 if she had bills to pay, like the IRS and things like
 17 that, I wouldn't have never taken the money in the
 18 first place if I had known that information.
 19 Especially that I'm now -- even if she wanted to
 20 donate, I would have told her don't give this amount,
 21 you need to keep some for your life and that kind of
 22 thing.
 23 Q So if --
 24 A I don't get involved in all of our contributors' life
 25 like that.

1 Q But when somebody gives you like a really big number,
 2 like over a million dollars, you don't say to them,
 3 "Can you afford this?"
 4 A I really haven't done that because I think it
 5 probably would be wise now for this to start doing
 6 that. But usually people who are giving are very
 7 responsible and they can do it, you know, so I -- you
 8 know, caught me totally off guard.
 9 Q Do you realize there are court orders telling Debbie
 10 Frazier that she cannot bring her children to St.
 11 Louis and participate in JMMI ministries?
 12 A I heard about that. Michelle told me about that.
 13 Q When was that?
 14 A That was some time ago, I can't tell you when
 15 exactly.
 16 Q Ballpark it. This year? Last -- give me --
 17 MR. POTTS: Don't guess.
 18 BY MS. RONAYNE:
 19 Q Just a ballpark.
 20 A I just don't know.
 21 Q So you're aware that she can't bring the children to
 22 JMMI?
 23 A Yeah.
 24 Q And since you became aware of that, has she brought
 25 them?

1 A No, I haven't seen them around at all.
 2 Q Did you meet with the children?
 3 A Meet with them? What do you mean?
 4 Q Did you have conversations with them?
 5 MR. POTTS: Ever.
 6 THE WITNESS: Oh, yeah. They came to
 7 the church so, yeah, at -- at the church, say hello
 8 and --
 9 BY MS. RONAYNE:
 10 Q What else? What was the conversation?
 11 A That's about it, just hello and just greeting them
 12 like I've greeted others.
 13 Q Did you talk to them about face-to-face visits with
 14 Jesus?
 15 A In a meeting?
 16 Q No. With them?
 17 A No.
 18 Q No?
 19 A Mm-uh.
 20 Q You have to answer yes or no.
 21 A No.
 22 Q Did you give them any of your books or DVDs?
 23 A No.
 24 Q Did somebody else, if you know, from your ministry
 25 maybe?

1 A I don't know what to say.
 2 Q Given that -- that Debbie is basically destitute, you
 3 understand that?
 4 A (Indicating).
 5 Q You have to answer yes or no.
 6 A Yes, mm-hmm.
 7 Q Okay.
 8 MR. POTTS: Is that an assumption for
 9 the question he doesn't know that except what you
 10 tell him what happened.
 11 MS. RONAYNE: Right.
 12 BY MS. RONAYNE:
 13 Q Given that you understand from --
 14 MR. POTTS: Given this is separate --
 15 okay.
 16 BY MS. RONAYNE:
 17 Q -- us, would those be circumstances under which you
 18 would be willing to give Mrs. Frazier back some of
 19 her money?
 20 MR. POTTS: Object to the form of the
 21 question.
 22 BY MS. RONAYNE:
 23 Q Go ahead.
 24 A Say that again.
 25 MR. POTTS: Excuse me.

1 BY MS. RONAYNE:
 2 Q Given that you understand Mrs. Frazier to be
 3 destitute and it's impacted her ability to have
 4 housing, her ability to see her children, under those
 5 circumstances, are you willing to give Mrs. Frazier
 6 back some of her money?
 7 THE WITNESS: Should I answer this?
 8 MR. POTTS: Yes, you can go ahead and
 9 answer.
 10 THE WITNESS: Yes. You know, I'm sure
 11 that with the board -- I took what he told me back to
 12 the board concerning her present circumstance and I
 13 would love to do that if we have the money, presently
 14 we don't. But I told them that I'm willing to -- if
 15 the money comes in through what we raise to support
 16 and help her, of course.
 17 BY MS. RONAYNE:
 18 Q So would that mean you would give her a check back
 19 for some of the funds that she had given?
 20 A I don't know how we would do it, but I will find out
 21 the legal right way to do that and -- and issue her
 22 that.
 23 Q Those funds? Issue those funds --
 24 A Yeah.
 25 Q -- to her?

1 MR. POTTS: Objection, form of the
 2 question. First of all, he's going to require
 3 guidance professionally --
 4 MS. RONAYNE: I understand that.
 5 MR. POTTS: -- on how he can, should
 6 otherwise collect the source. So the concept is fine
 7 to talk about specifics. He certainly --
 8 MS. RONAYNE: I'm not asking him to --
 9 MR. POTTS: -- isn't qualified to
 10 answer those kinds of questions.
 11 THE WITNESS: Right.
 12 BY MS. RONAYNE:
 13 Q Has Debbie talked about relocating to St. Louis
 14 recently with anyone that you know?
 15 A Not that I know of.
 16 Q Has anybody talked to you about her oldest daughter
 17 going to college there?
 18 A No.
 19 Q Katie? Do you know if she's talked to Michelle about
 20 that?
 21 A I'm not sure.
 22 Q Are you aware that Debbie refers to JMMI in the
 23 presence of the children as their second family?
 24 A No.
 25 Q Are you aware that Debbie had people from JMMI

1 staying at her residence for overnight at least some
 2 period of time?
 3 A Yes, I did know. I had heard about that.
 4 Q What had you heard?
 5 A Just that whatever -- have some come from St. Louis
 6 in town that she let them stay there for a day or
 7 two.
 8 Q Do you know how many people it would be at any given
 9 time?
 10 A Just one from what I knew.
 11 Q And that were the times, you understand, that at
 12 times it would be when her children were having
 13 parenting time with her, back when that was allowed?
 14 A No.
 15 Q You didn't know that?
 16 A No.
 17 Q Now, when you came into town there were times whether
 18 or not that you used Deborah Frazier's vehicle? Or
 19 someone that was driving you used Deborah Frazier's
 20 vehicle?
 21 A Maybe, I don't know. I wasn't aware.
 22 Q You weren't aware of whose car you were driving?
 23 A No. We rent cars when I come in so if they switched
 24 up the cars I wouldn't know or -- I'm just going for
 25 the ride wherever they take me.

1 Q You have no input about any of that?
 2 A I don't handle that.
 3 Q So you wouldn't recognize that you were repeatedly
 4 driven in the car that was owned by -- the same car
 5 that was owned by Debbie Frazier?
 6 A Well, I know what her car looks like now. But what
 7 I'm saying is during those times I didn't know. We
 8 rent cars when I come to town. They rent the cars
 9 for me.
 10 Q Did you think it was always the same car that got
 11 rented?
 12 A It was usually different --
 13 Q Right.
 14 A -- you know, but they usually rent the same kind of
 15 car, too, so.
 16 Q So you didn't realize it was rather regularly just
 17 Debbie's car?
 18 A Because I -- I was never in that car regularly.
 19 Q Did she ever drive you around?
 20 A No.
 21 Q When you say it's up to the board, now the board
 22 includes Michelle?
 23 A Yes.
 24 Q You?
 25 A Yes.

- 1 Q And who else?
- 2 A I'm not sure. You can ask Michelle.
- 3 Q You don't know who's on the board?
- 4 A Totally I would rather you get the accurate
- 5 information because I don't want to be accused of
- 6 answering falsely like I have been other times when
- 7 I've tried to guess. So I just you'd rather -- I'm
- 8 telling you I don't know, just ask her.
- 9 Q How many people are on the board?
- 10 A I don't know. Just --
- 11 Q You don't know?
- 12 A No.
- 13 Q Don't you have to have board meetings?
- 14 A Yes, we do have board meetings.
- 15 Q So can't you count around the table how many people
- 16 there are?
- 17 A Well, our board also grows at the same time. So I
- 18 just rather you just get that information from her.
- 19 Q The last time you had a board meeting was when?
- 20 A I was on the phone, I think the beginning -- it was
- 21 in the beginning of the year in January. I can't
- 22 exactly tell the date, but --
- 23 Q It was on the phone?
- 24 A Yeah.
- 25 Q How did you meet Deborah Frazier?

- 1 A She came to the meetings that we hold in --
- 2 Q In Taylor?
- 3 A -- Taylor church.
- 4 Q When Deborah Frazier volunteers, do you pay her
- 5 travel costs when she comes to St. Louis?
- 6 A No.
- 7 Q No?
- 8 A No.
- 9 Q She's on her own?
- 10 A Yeah.
- 11 Q So if she said that she was being reimbursed for
- 12 that, would you say that's not accurate?
- 13 A If she says she's being reimbursed, then I -- I don't
- 14 know what's going on there. I don't handle that part
- 15 of the ministry.
- 16 Q But your understanding is she's not?
- 17 A From what I know -- I -- I really wouldn't like to
- 18 answer that, I'd just rather say I don't know.
- 19 Q But other people, you do reimburse and assist them
- 20 with their costs, right?
- 21 A Of course, but I don't always know who that is. I
- 22 don't handle that part of the ministry.
- 23 Q All right. So would that be something that Debbie
- 24 Frazier would be eligible for?
- 25 A Of course.

- 1 Q And if you knew she didn't have any personal money or
- 2 it was taking away from her ability to support
- 3 herself, would that be something you would provide
- 4 for her?
- 5 A Of course.
- 6 Q Would you provide her with lodging in St. Louis?
- 7 A Of course.
- 8 Q How would you do that?
- 9 A Well, just like we provide that for others, you know,
- 10 who -- if they're on a ministry trip, that's if
- 11 they're under the ministry (inaudible) take care of
- 12 their expenses.
- 13 Q So if Debbie Frazier moved to St. Louis would you pay
- 14 for her residence there?
- 15 A No, we don't do that. I won't pay for anybody's
- 16 residence to move. They have to get a job or, you
- 17 know, if they're going to relocate, that's not our
- 18 responsibility, the ministry encourages that.
- 19 Q But it was for -- you said for the Ware Family?
- 20 A No, it wasn't. They just -- they didn't have nowhere
- 21 to stay for a few days or however long we were
- 22 helping them. But then I found out they didn't have
- 23 a place to stay so I -- I opened up my home to their
- 24 family.
- 25 Q And you had never met those folks before?

- 1 A Well, it wasn't that. They had been in the ministry
- 2 for a little time. We got a chance to know them so.
- 3 Q How would they have been in the ministry?
- 4 A We --
- 5 Q They lived somewhere else?
- 6 A Yeah. They came down and was active for maybe a few
- 7 months and we got a chance to know them a little bit.
- 8 Q And then they came and you supported them?
- 9 A Yes.
- 10 Q You stated in your last deposition that you would
- 11 like to hire Mrs. Frazier?
- 12 A Mm-hmm.
- 13 Q You have to answer yes or no.
- 14 A Yes, mm-hmm.
- 15 Q Have you explored that?
- 16 A Explore? What do you mean by explore?
- 17 Q Explored whether you're going to hire her?
- 18 A What do you mean by explore? What -- can you
- 19 rephrase.
- 20 Q Well, you said that you would like to hire her. So
- 21 have you done anything about that?
- 22 A Not at this time. We haven't added anybody on yet.
- 23 We have to wait until the finances is there for that
- 24 kind of thing.
- 25 Q So when somebody gives you 1.2 million, where does

1 that money go? To what?
 2 A It goes to ministry operations.
 3 Q So for the running of JMMI?
 4 A Mm-hmm.
 5 Q You have to answer yes or no.
 6 A Yes, mm-hmm.
 7 Q So who has been on the JMMI payroll in the last 90
 8 days?
 9 A Michelle Brannon is really the only one on the salary
 10 payroll, and myself at this time.
 11 Q Just the two of you?
 12 A Mm-hmm.
 13 Q You have to answer yes or no.
 14 A Yes, mm-hmm.
 15 Q Do you have a former or current FBI agent associated
 16 with JMMI now?
 17 A No.
 18 Q Has there been?
 19 A No.
 20 Q You never had anybody with the FBI involved?
 21 A No.
 22 Q At one point your mother and father were on the JMMI
 23 Board of Directors?
 24 A Mm-hmm.
 25 Q You have to answer yes.

1 A Yes, mm-hmm.
 2 Q Okay. And you recall that time period?
 3 A I think it was -- you know, I don't remember. I know
 4 it was a few years ago, so I think -- I'm not quite
 5 sure.
 6 Q Then they resigned, did they not?
 7 A No, they didn't resign.
 8 Q They didn't resign?
 9 A No.
 10 Q You filed paperwork showing they resigned?
 11 A No. It shouldn't say resignation.
 12 Q And then in 30 days they were back on the board?
 13 A No.
 14 Q You don't recall that?
 15 A No.
 16 Q They were on, they were off, they were on, and aren't
 17 they off now?
 18 A No. Yeah, they're off. But the way you were saying
 19 this isn't the way things happened, no.
 20 Q What did they -- did they receive compensation?
 21 A No.
 22 Q They weren't paid at all?
 23 A No.
 24 Q Are they both living?
 25 A Yes.

1 Q What are their names?
 2 A Katie and James Taylor.
 3 Q K-a --
 4 A K-a-t-e.
 5 Q K-a-t-e, not Kate?
 6 A Katie.
 7 Q K-a-t-e and you call her --
 8 A T-i-e. I'm sorry.
 9 Q Okay. And James?
 10 A Taylor, mm-hmm.
 11 Q And where do they reside?
 12 A Memphis, Tennessee.
 13 Q Is James Taylor the same one that prepares your tax
 14 returns?
 15 A Mm-hmm.
 16 Q He's your father?
 17 A Mm-hmm. He has an income tax business.
 18 Q Oh, so your father's prepared your taxes?
 19 A Well, not now. He did at one time. We had him doing
 20 that because he has a very integral business, it's
 21 been around for over 30 years.
 22 Q So when your dad did your taxes, 2012, just a couple
 23 of years ago, and he's listed as the tax preparer --
 24 A Yes, mm-hmm.
 25 Q -- and he's the one that made the judgment then

1 apparently to include these four people as
 2 exemptions?
 3 A Yes.
 4 Q So you're saying that your parents were never off the
 5 board for any period of time other than when they
 6 finally came off now?
 7 A Yes.
 8 MS. RONAYNE: If I could look at that
 9 document. Do you have it with you?
 10 MR. YATOOMA: Keep going.
 11 MS. RONAYNE: Okay.
 12 MR. YATOOMA: I'll look for it.
 13 BY MS. RONAYNE:
 14 Q In June 18th, 2013, -- well, let me ask you first.
 15 Who is Bill Hode? Do you know that name?
 16 A Yes.
 17 Q Who is that?
 18 A He is a minister in the -- in JMMI.
 19 Q He's a -- what do you have to do to be a minister?
 20 A Well, you have to qualify --
 21 Q How?
 22 A -- basically through being trained.
 23 Q By whom?
 24 A Well, in this case I train ministers. But he was a
 25 minister before I knew him so -- in the other church

1 they had. So he was already a minister before he met
 2 me in our organization.
 3 Q Does that mean he's licensed?
 4 A I don't know. You'd probably have to ask him.
 5 Q So how do you -- you just accept that he's a
 6 minister? How do you know he's a minister?
 7 A Well, I can see from the qualification of how he
 8 handles his-self and I'm -- been a minister for 25
 9 years so I know.
 10 Q So you can just tell by looking at somebody if
 11 they're a minister?
 12 A Well, if they say -- if I know they have ties to a
 13 reputable church before and if they come and start
 14 working in our ministry and I see their expertise,
 15 then, yes --
 16 Q You don't have to be --
 17 A -- I can tell.
 18 Q You don't have to be ordained?
 19 A Well, yeah, you can be ordained, but the ordination
 20 is not what makes you a minister.
 21 Q So do you, when you accept someone as a minister, do
 22 you, then, do a background check to see whether they
 23 were legitimately associated with any of these
 24 places?
 25 A Mm-hmm.

1 when you minister or when you do any service for the
 2 ministry we -- we give honorariums.
 3 Q And what do you have to do to get an honorarium?
 4 A Well, speak or minister. Do some form of ministry in
 5 the church or ministry.
 6 Q Do you give these out routinely?
 7 A If I have a guest speaker or if I have somebody come
 8 and do a service for the ministry, yeah.
 9 Q And it's \$2,000?
 10 A It's not normally just 2,000. It depends.
 11 Q It's more than that usually?
 12 A It depends.
 13 Q It could be more than that?
 14 A Yeah, mm-hmm.
 15 Q And how long do they stay and talk?
 16 A It depends, maybe -- a whole service could be for
 17 like two or three hours.
 18 Q And you make \$2,000?
 19 A Yeah, that's -- that's not standard.
 20 Q How is it not standard?
 21 A It's not -- it could be more or less depending on the
 22 qualification or the donation. The work that they do
 23 that night for the Lord.
 24 Q So how much you pay them depends on how much you
 25 receive in donations in some way?

1 Q What do you do?
 2 A Well, I just have people on the staff or board check
 3 backgrounds, do an investigation.
 4 Q Like what?
 5 A Or if I don't need that if I already know the leaders
 6 who already know -- are reputable, then I don't have
 7 to do that.
 8 Q All right. So you're say -- how old is Mr. -- is it
 9 Hode?
 10 A Yes, mm-hmm.
 11 Q How old do you think he is?
 12 A I think -- I'm not sure. I think he's 40. I don't
 13 know. Let me just say I don't know.
 14 Q Forty, somewhere around there?
 15 A No, no, no. He's not 40. I'm just saying I don't
 16 know.
 17 Q Okay. Do you know if he's related to Debbie Frazier?
 18 A Yes. I found out they're cousins.
 19 Q And June 18th, 2013, you paid Debbie Frazier's
 20 cousin, Bill Hode, \$2,000. What was that for?
 21 A That was a ministry gift to bless him.
 22 Q What does that mean?
 23 A I'm sorry?
 24 Q A ministry gift to bless him?
 25 A Or an honorary is what we call it, the name of it,

1 A Sometimes.
 2 Q So you have --
 3 A But this, for him, it was not just any one service.
 4 It was just his involvement in helping the ministry.
 5 Q In general, he didn't give a service?
 6 A Right.
 7 Q And who makes that decision of who to give that kind
 8 of money to?
 9 A The board and myself.
 10 Q So this was just a general gift?
 11 A It was an honorarium as I said.
 12 Q Now, do you give Mr. Hode a 1099?
 13 A I think I did. I'm not sure. I didn't do it,
 14 though.
 15 Q Sure. On your behalf somebody -- somebody gave a
 16 1099.
 17 A Mm-hmm.
 18 Q Because that -- there -- there are lots of payments
 19 to Mr. Hode in several thousands of dollars over the
 20 course of time, right?
 21 A Okay. No. I don't -- I don't know if there's lots.
 22 I don't --
 23 Q Well, they total thousands of dollars, more than the
 24 two. It wasn't a one shot deal, you acknowledge
 25 that?

1 A I only remember giving -- for allowing that to happen
 2 maybe twice. That's it.
 3 Q Okay. And it's your understanding that you do a 1099
 4 to him and he's to report that as his income?
 5 A That's right.
 6 Q So each time that somebody comes and you pay them an
 7 honorarium or if just whatever you think is a good
 8 guy or whatever, you give them a 1099?
 9 A Yes, that's the -- what the law requires.
 10 MS. RONAYNE: Yeah. We did request
 11 the 1099s but we haven't gotten them. Maybe they're
 12 in the package tomorrow.
 13 BY MS. RONAYNE:
 14 Q In June of 2013 there's over \$6,000 worth of charges
 15 for the Disney Resort Hotel in Anaheim California.
 16 Do you remember that?
 17 A Yes.
 18 Q And did you go?
 19 A Yes, I was there.
 20 Q And who were you with?
 21 A I know it was four staff. I can't remember exactly
 22 who all went, but we were down there in Orlando for a
 23 meeting and then we also went on vacation, yes.
 24 Q To Disneyland?
 25 A Yes.

1 Q And JMMI paid for that?
 2 A Yes.
 3 Q And so, do you report that on your income when you
 4 get paid for a vacation?
 5 A I don't -- I don't know, I'm not into that part. I
 6 have people who take care of that for me.
 7 Q Do you give the staff 1099s for paid vacations?
 8 A I -- I don't know the financial --
 9 Q Okay.
 10 A -- I don't --
 11 Q What four staff members were there?
 12 A Like I said, I can't remember who they are.
 13 Q These were in Anaheim, California, so apparently you
 14 did Anaheim and Orlando?
 15 A Mm-hmm.
 16 Q You have to answer yes.
 17 A Yes.
 18 Q So you took staff to Orlando and Anaheim for a
 19 vacation at Disney Resorts?
 20 A It isn't quite like that.
 21 Q Okay.
 22 A So I have different staff that accompany me to
 23 different cities I go into, so when I was in
 24 California that year and we went to Disney World at
 25 the same time, yeah, the staff go. I treated them to

1 that. And so, the same thing in Orlando when that
 2 happened.
 3 Q All right.
 4 A But I'm just stopping, just take them there. We are
 5 having a meeting engagement, and then on the time off
 6 I allow that to happen.
 7 Q And JMMI paid the \$6,000 for the resort charges?
 8 A Yes, mm-hmm. Of course.
 9 Q Of course? Even for the vacation?
 10 A Yes, of course.
 11 Q All right. So who was there in Anaheim -- Anaheim,
 12 California?
 13 A I don't remember.
 14 Q You don't remember who you went with?
 15 A No. It's been so long, you know, and I travel all
 16 the time with different groups so.
 17 Q And all on JMMI's dime?
 18 A Well, that's -- you -- what do you do when you have a
 19 staff who you need to go help and they're not getting
 20 salary but they're volunteering their time. What,
 21 they're supposed to pay their own plane tickets? No.
 22 The ministry take care of that because the ministry
 23 is using them on the road to do things so we take
 24 care of basic expenses, and if there is a vacation
 25 thrown in there, which is not always, we allow that

1 to happen --
 2 Q And you --
 3 A -- as a benefit.
 4 Q And you pay for that?
 5 A Yes.
 6 Q Okay. But you can't say if you issue them any kind
 7 of gift or receipt or 1099s for that benefit?
 8 A You know what, I don't know the legal --
 9 Q Okay. And -- so you went to both Orlando and Anaheim
 10 and paid for vacations for staff members but you
 11 don't know who they are?
 12 A No, I can't remember exactly who it is. I'd rather
 13 not say until -- I'd rather not.
 14 Q Was -- were your children included?
 15 A My children were there with me in Orlando.
 16 Q And --
 17 A And Anaheim.
 18 Q And did JMMI pay for them?
 19 A I think so, but I'm not sure. I don't think -- I
 20 usually -- when I go on a vacation, the ministry give
 21 me a vacation bonus and it comes out of that so.
 22 Q The vacation bonus and -- I don't see that reported
 23 as income anywhere on your tax return?
 24 A Well, I mean, you got to go to the people who handle
 25 that, they can explain.

1 Q You don't know anything about your own finances?
 2 A Not a lot. I have professionals take care of that
 3 and people who know about non-profit business. But I
 4 can assure you I'm not doing anything illegal.
 5 Q Well --
 6 A The only thing we have is open, so there's nothing to
 7 hide. You can see everything we have on our papers.
 8 Q I'm not sure that your conclusion is accurate.
 9 A Well, that's your opinion.
 10 Q Right.
 11 A That's your opinion.
 12 Q Did Debbie Frazier go on either of the Disney Resort
 13 trips?
 14 A Not that I remember. I don't --
 15 Q You know it was --
 16 A She --
 17 Q It was four people and you can't remember who they
 18 are?
 19 A I mean, it's been a while and I have different people
 20 who will go so I -- I don't remember actually, but I
 21 know I had a group with me.
 22 Q Do you go to Disney Resorts every year?
 23 A Not every year, no.
 24 Q But mostly?
 25 A No. Honestly, I hadn't been to Disney World in --

1 before this time in probably, I don't know, three --
 2 three years, four or five, something like that.
 3 Q So where was the meeting that you had in Anaheim?
 4 A It was in Anaheim.
 5 Q Where? I mean, what -- what organization or --
 6 A I can't remember exactly who that was.
 7 Q All right. On September 6th, 2013, JMMI wrote a
 8 check to Charter Place for thirteen hundred and fifty
 9 dollars with a memo line recording it as T. Taylor's
 10 rent. Is JMMI paying rent for your ex-wife Tabitha?
 11 A No, I don't -- I don't know what that is. I can't
 12 answer that.
 13 Q You have no idea why thirteen hundred and fifty
 14 dollars --
 15 A No.
 16 Q -- would be paid and it would be marked rent?
 17 A No.
 18 Q There are actually several monthly payments, October,
 19 November, et cetera, that same year made to Charter
 20 Place with the same notation.
 21 A Mm-hmm. I'm not quite sure, you'd probably have to
 22 ask Michelle about that.
 23 Q Does Tabitha work in your ministry?
 24 A No.
 25 Q But somehow her rent's being paid?

1 A I don't know about that. No, we don't do that, I'm
 2 sure.
 3 Q Who would T. Taylor be made for?
 4 A I'm not sure. You'd probably need to ask the
 5 financial advisors about that.
 6 Q Well, let me show you cancelled checks we've
 7 received. It's from JMMI Ministries, Charter Place,
 8 thirteen hundred and fifty dollars September 6th,
 9 2008, it's marked --
 10 MR. YATOOMA: 2013.
 11 BY MS. RONAYNE:
 12 Q I'm sorry. 2013. And it's marked in the memo line,
 13 T. Taylor's rent.
 14 A Okay.
 15 Q And who is this person's signature on that account?
 16 A That's a lady who has died recently, but she was with
 17 us for many years. Marian France.
 18 Q Marian France?
 19 A Mm-hmm, yes.
 20 Q When did she die?
 21 A About -- it was last year, I think. I'm not sure the
 22 exact date but.
 23 Q Did she -- she obviously had signatory authority on
 24 the check?
 25 A Mm-hmm. Mm-hmm.

1 Q Checking account?
 2 A Yes, mm-hmm.
 3 Q And then there's a September 10th, 2013, check,
 4 sixteen hundred dollars rent for Michelle Brannon.
 5 A Mm-hmm.
 6 Q And I'll show you this one.
 7 A Okay.
 8 Q If you can tell -- the middle line is for Michelle
 9 and it's sixteen hundred dollars. Is JMMI paying
 10 Michelle's rent?
 11 A I really can't answer to you what this line of
 12 financing was for. So, you know, you may see one
 13 thing but not know what's really happening, so it
 14 would be better to ask Michelle in the financial --
 15 those who deal with the finances.
 16 Q So you're saying that you don't watch over the
 17 finances at all, that you do not look at to see who
 18 is receiving money properly or improperly?
 19 A That's not true. I have a firm. My -- my way of
 20 looking is having a professional firm, an accountant
 21 to do that.
 22 Q Who's that?
 23 A Ask Michelle, she knows.
 24 Q You don't know who the firm is?
 25 A I -- I think I know their name, but I'll just -- I

1 don't -- I don't think I have it right so just ask
 2 her.
 3 Q Well, wasn't that when your dad was doing the
 4 accounting?
 5 A What did you say now?
 6 Q Wasn't that when your dad was doing the accounting?
 7 A What are you talking about?
 8 Q During that time period.
 9 A What are -- you're confusing two things. I'm -- he
 10 was doing my personal income taxes.
 11 Q He didn't do JMMI's?
 12 A He may have, I'm not sure on that time. But I also
 13 had firms or accountants.
 14 Q So how many different firms have you had using your
 15 -- or preparing your financial information?
 16 A I can't answer. I don't know.
 17 Q Michelle handles that?
 18 A Mm-hmm.
 19 Q You have to answer yes.
 20 A Yes.
 21 Q Okay. On November 4th, 2013, JMMI made a purchase of
 22 \$9,560 from Amini's Galleries in St. Louis which is a
 23 store that specializes in pool tables and game rooms
 24 and juke boxes.
 25 A Mm-hmm.

1 Q What was that purchase for?
 2 A I'm not sure. You probably need to ask --
 3 Q You have no idea?
 4 A You probably need to ask Michelle. I don't -- I
 5 can't remember what that's about.
 6 Q I mean, that's just, what, a year ago? Did anything
 7 come into -- to any of your buildings that was a pool
 8 table or something resembling that?
 9 A No. We didn't buy a pool table.
 10 Q You didn't buy a pool table?
 11 A No.
 12 Q Did you buy a juke box or ping pong or --
 13 A No.
 14 Q You can't -- a \$9,000 expenditure --
 15 A I mean, you can't go by, you know, just the name of a
 16 company that sounds like it's a juke -- because it
 17 could be something else they have in there that could
 18 serve ministry purpose or whatever their --
 19 whatever's happening.
 20 Q Well, give me an example.
 21 A I don't know.
 22 Q You don't know what \$10,000 would be spent on?
 23 A I have confidence in very integral people with our
 24 finances, so I trust them, so you will have to ask
 25 them.

1 Q So anybody on the board could authorize that kind of
 2 purchase and sign the check?
 3 A Not any one, only those who have the power to sign
 4 checks.
 5 Q And who are they?
 6 A I don't know. I'll share with you I don't know. Ask
 7 Michelle.
 8 Q You have no idea?
 9 A No. I know I'm one of them.
 10 Q And you know Michelle's one of them?
 11 A Yes.
 12 Q Anybody else that you know of?
 13 A No.
 14 Q So Michelle would have complete discretion to spend
 15 almost \$10,000 on something?
 16 A If she knew -- she ran it by the board.
 17 Q But you don't even know who's on the board, you can't
 18 tell me who's on the board.
 19 A Like I shared with you, that you can ask all this
 20 information and they'll share what you want to know,
 21 but I have a process that people go through before
 22 they spend large sums of money.
 23 Q Okay. But you don't know what it is?
 24 A Yes, I do.
 25 Q You don't have price the --

1 A You have to go through the board --
 2 Q All right. And you're on the board.
 3 A Yes, I am on the board.
 4 Q So wouldn't that have been run through you?
 5 A Not smaller purchases like that.
 6 Q Not a \$10,000 purchase that's small?
 7 A No, the board can handle that kind of purchase. They
 8 can decide if that's wise or not.
 9 Q Does it take a board meeting to decide that?
 10 A I don't understand if it will take a board meeting
 11 the way you're thinking of. Maybe they can have a
 12 phone conference or -- if they're not altogether.
 13 Q Right.
 14 A Because this is a traveling ministry so we are always
 15 on the go.
 16 Q So how many people are on the board? How many people
 17 does it take to have a phone call with?
 18 A I don't know.
 19 Q You don't know?
 20 A I told you I don't -- I don't know the accurate
 21 amount. Instead of saying something, I'm telling you
 22 I don't know.
 23 Q All right. So when you're on a phone call during the
 24 board meeting, you have no idea how many people are
 25 on the other end of the phone?

1 A I don't actually. I don't -- I don't -- at that
 2 time, I don't know. I don't -- at this time I do not
 3 know how many people.
 4 Q How do you get appointed to the board?
 5 A Well, you have to go through the right -- I don't
 6 know if we've ever come up with any -- any kind of a
 7 process like that other than credibility, you know,
 8 towards myself and anybody who is qualified.
 9 Q What do you mean anybody that's qualified?
 10 A Yeah, you have to qualify to be able to do ministry
 11 work. I mean, on that level so.
 12 Q All right. Tell me what the means, you have to
 13 qualify.
 14 A I mean, to be an administrator, to be a head in the
 15 ministry.
 16 Q So how does one do that? I asked what the process
 17 was and you don't know.
 18 A Well, I mean, first of all, I need to know their
 19 credentials and what they've done in the past.
 20 Q So do you review every applicant for the board?
 21 A Of course.
 22 Q Do they make a written application?
 23 A Yes, and I don't know all the process -- I don't know
 24 everything because I've stopped handling a lot of
 25 that over the years. So I have other people to

1 Q And so --
 2 A So it's not that I'm not giving you information like
 3 Rick is saying, I'm -- I'm telling you the way you
 4 keep --
 5 Q Well, who hired -- you don't know the number of board
 6 members, you don't know they are, you don't know how
 7 they get to be, and you don't know what happens to
 8 make a \$10,000 purchase.
 9 A When you get bigger in ministry like what I do, you
 10 don't handle all of that. I'm a preacher, I focus on
 11 the spiritual aspect of the ministry, and I have
 12 professionals who do the professional aspect.
 13 Q And that includes -- that's Michelle almost
 14 exclusively, isn't it?
 15 A She's a part of it, so --
 16 Q So it doesn't bother you that -- that Michelle can
 17 write a -- herself a check for her rent and not clear
 18 it with you?
 19 A That's not the way things go. That's not the -- I
 20 mean, you can --
 21 Q Well, we've got a check for --
 22 A -- you just said --
 23 Q -- her rent?
 24 A But that's what you're trying to say. You're --
 25 you're falsifying information.

1 handle those things for me, so I can't answer a lot
 2 of these questions.
 3 Q So you don't know how many are on the board or how
 4 you get to be on the board?
 5 A Not -- I know the process. I know kind of what we
 6 look for, but I, right now, because I am so busy and
 7 I can't do all of the internal stuff. I have --
 8 that's why I hired Michelle as an executive to handle
 9 this. And she was an executive at -- way before.
 10 Q She was what?
 11 A She was an executive for other companies before she
 12 came -- or a good administrator, so I hired her to
 13 handle --
 14 Q Okay. But don't you have as CEO and -- I mean, your
 15 name is kind of associated with this, aren't you
 16 concerned that there could be people that are taking
 17 advantage of the money in the ministry?
 18 A Well, that's why I have CPAs and accountants --
 19 Q CPAs?
 20 A -- who -- I mean, we have hired our firms outward.
 21 Outside the ministry to go through the money to make
 22 sure that it's not happening. You can find out from
 23 Michelle.
 24 Q Who does that?
 25 A Mm-hmm.

1 Q No -- okay, okay. Let's stop right there.
 2 A No.
 3 Q If you're saying I'm falsifying information --
 4 A That's what you're doing.
 5 Q -- I'll pull the check, give me the check, and you're
 6 going to tell me --
 7 A Just because you're pulling a check don't mean you
 8 were given the right information. You are lying
 9 about that.
 10 Q I'm lying about something?
 11 A Yes. Just because that's there don't mean -- your
 12 opinion is a lie. So what I'm saying to you --
 13 Q My opinion is a lie?
 14 A -- go to her and find out what it's about. Don't
 15 show me the check again, I already -- I already saw
 16 it.
 17 Q So you're saying I am lying, that this is -- this
 18 says --
 19 MR. POTTS: No, she's not lying.
 20 THE WITNESS: No, I'm not saying --
 21 MR. POTTS: She's not lying.
 22 THE WITNESS: -- that you're lying
 23 about this on here. I'm saying that your opinion is
 24 a lie.
 25 BY MS. RONAYNE:

1 Q My opinion is nothing other than a check was written
 2 for Michelle's rent.
 3 A You just gave a connotation that so you're saying
 4 that she can just write out a check for herself and
 5 do this. That ain't how we operate. So what I'm
 6 saying to you, go and find out. I can't tell you all
 7 the --
 8 Q And you can't tell me how it operates?
 9 A I can't tell you all the legal --
 10 Q What are the checks and balances?
 11 A -- some are allowed in the IRS for us to operate.
 12 Q Okay. What do the checks --
 13 A You just say --
 14 Q -- and balances that you have to make sure that
 15 nobody's scamming the money?
 16 A A firm -- a CPA firm who checks and audits our books.
 17 Q But you don't know who they are?
 18 Q I know Brown Smith and Wallace -- not Brown Smith and
 19 Wallace. I don't know what to say, I get these names
 20 mixed up and numbers and stuff. But I -- my thing
 21 is, I am not evading the answer, I'm telling you
 22 where you can go get it. So what I'm saying to you
 23 is accurate so I don't go through this rigmarole with
 24 you all about this.
 25 Q What I'm trying to say is, you have millions of

1 A Yes.
 2 Q And who holds the mortgage?
 3 A Harold Lewis.
 4 Q Who's he?
 5 A He's the former -- oh, he's the owner or former owner
 6 for the person we are buying the house from.
 7 Q So -- but you're also -- I recall you testifying that
 8 you're leasing this house and the documents show for
 9 \$6,500 a month?
 10 A That's just the lease to own.
 11 Q You don't have a lease to own?
 12 A Well, that's what our agreement is.
 13 Q Oh, lease to own.
 14 A Our original intentions is to buy the home and that's
 15 what we're doing, and so that's the agreement.
 16 Q What's the agreement?
 17 A That we are buying a home, we are purchasing a home
 18 or we're leasing to own at this time. But the
 19 \$250,000 is our earnest money to purchase the home.
 20 Q Who's Harold Lewis in this? How do you know him?
 21 A He's the owner of the home, that was trying to sell
 22 the home.
 23 Q Do you have a land contract?
 24 A Yes, I think we do. I'm not -- don't quote me on
 25 that, but it's -- I mean, Michelle will be the best

1 dollars coming into this place and you're constantly
 2 asking for money, and you can't tell me who can write
 3 checks, who can make decisions about writing checks,
 4 and how those things get authorized or who's on the
 5 board and who decides, right?
 6 A Because I -- I've done this for 25 years and I've
 7 established from the ground, and I have things
 8 already put in place that I don't have to go back and
 9 check like that. Not like that. I have that system
 10 set up so --
 11 Q What is the system?
 12 A -- what you want to know, ask the person who I have
 13 in charge.
 14 Q And that's Michelle?
 15 A Exactly.
 16 Q Okay. There's an October 24th, 2013, check JMMI
 17 wrote for \$250,000 as a down payment for a
 18 Chesterfield home.
 19 A Mm-hmm.
 20 Q What does that go to?
 21 A That was a down payment to purchase the residential
 22 center in St. Louis on Timpaige.
 23 Q And that came from JMMI --
 24 A Yes.
 25 Q -- funds? Is there a mortgage on it?

1 person to answer that question.
 2 Q So you gave Mr. Lewis \$250,000 --
 3 A Mm-hmm
 4 Q -- as a down payment, and in addition to that, you're
 5 paying sixty-five hundred dollars a month?
 6 A Yes. The ministry does, yeah.
 7 Q But you didn't provide us with a -- with a land
 8 contract, you provided us with a lease?
 9 A Okay. So maybe that's what that is. I can't --
 10 Q I'm going to show you a residential lease for JMMI
 11 for the -- how do you pronounce it Tim --
 12 A Timpaige.
 13 Q -- Timpaige property for \$6,500 a month in rent
 14 beginning November 1st, 2013, and ending on January
 15 1st, 2016.
 16 A Mm-hmm.
 17 Q And it talks about security of sixty-five hundred and
 18 that you're going to pay a lease of \$6,500.
 19 A Yeah.
 20 Q It doesn't anywhere talk about recognition of a down
 21 payment or a --
 22 A Which it should.
 23 Q It should?
 24 A Yep. Or, if it don't, then -- like I say, you need
 25 to -- it would be good to go to Michelle she's

1 handling --
 2 Q This is \$250,000 and you're not up to speed on what
 3 this is about?
 4 A I am up to speed on that.
 5 Q And what is it?
 6 A It was a big purchase, I know what we did on that.
 7 Q What does this say?
 8 A Residential Lease. This is lease to own. I --
 9 Q Show me where it says lease to own? Show me anywhere
 10 residential lease.
 11 A Oh, residential lease.
 12 Q Right.
 13 A Oh, so you're just trying to say that what I'm saying
 14 lease to own is not --
 15 Q It's not on this document, is it?
 16 A Well, I am sharing with you this is the conversation
 17 we had with the owner of the house, and this is why
 18 we put down \$250,000 earnest money for that -- toward
 19 that.
 20 Q Where is the document that says because --
 21 A Well --
 22 Q Hold on. We asked for this.
 23 A Mm-hmm
 24 Q The document that says you're purchasing that.
 25 A Yes.

1 Q Where is that?
 2 A I think you should have that on what we don't --
 3 Q I don't have it.
 4 A Well, maybe we can ask her about that. She should be
 5 able to provide that to you.
 6 Q I would like --
 7 MS. RONAYNE: If you can make note of
 8 this, Dave, I would like a copy of whatever the
 9 purchase agreement is or whatever document that shows
 10 the \$250,000 because it doesn't make any sense.
 11 MR. POTTS: Just let me ask a
 12 question.
 13 MS. RONAYNE: Mm-hmm.
 14 MR. POTTS: Do you understand that
 15 these lease payments are to be applied to the
 16 ultimate purchase price?
 17 MS. RONAYNE: Well, that's the
 18 question. What's the purchase price?
 19 MR. POTTS: I'm just asking him if he
 20 understands that.
 21 THE WITNESS: Yes, of course.
 22 MS. RONAYNE: I mean, you --
 23 MR. POTTS: Do you know what the
 24 purchase of the --
 25 THE WITNESS: Yes.

1 MR. POTTS: -- property is?
 2 THE WITNESS: I do. It's --
 3 MR. POTTS: How much is it?
 4 THE WITNESS: -- \$2.5 million.
 5 MR. POTTS: Okay.
 6 THE WITNESS: And we are putting down
 7 a total of 500k. We have only put down two hundred
 8 and fifty at this time, and the six hundred and --
 9 \$6,500 is the lease. Now, as you know that a lease
 10 for that amount of money -- this was a personal
 11 situation we worked out with the owner.
 12 MR. POTTS: I'm just trying to
 13 understand what she's trying to understand.
 14 THE WITNESS: Yeah.
 15 BY MS. RONAYNE:
 16 Q It doesn't make sense.
 17 A Well, I mean --
 18 Q And it's not legal, I can tell you that. Because any
 19 thing --
 20 A It's not legal?
 21 Q No. Anything that deals with land --
 22 A Uh-huh.
 23 Q -- must be in writing.
 24 A Yes.
 25 Q And you have a lease that expires in 2016.

1 A I -- I just don't think you probably have all the
 2 documents here, but we should have more than that so
 3 I will rather you ask about that because we just got
 4 out of --
 5 MR. POTTS: What's the property
 6 called?
 7 THE WITNESS: Timpaige.
 8 MR. POTTS: T-i?
 9 THE WITNESS: Yeah. That's the -- I'm
 10 sorry. That's the --
 11 BY MS. RONAYNE:
 12 Q Street?
 13 A Yeah.
 14 Q The street name?
 15 A Timpaige, yeah.
 16 Q But they call it the --
 17 MR. POTTS: T-i-m-p --
 18 THE WITNESS: A-i-g-e.
 19 MS. RONAYNE: They call it the
 20 residential center.
 21 THE WITNESS: Mm-hmm.
 22 BY MS. RONAYNE:
 23 Q And the \$250,000 check is written on October 24th,
 24 2013, and the beginning of this lease is November
 25 1st, so it doesn't make any sense.

1 MR. POTTS: Is it 2.25 purchase? Is
2 that the amount?
3 THE WITNESS: Yeah, 2.2 -- 2.5, yeah.
4 MR. POTTS: Two point five.
5 THE WITNESS: Mm-hmm.
6 MR. POTTS: Is the difference, okay.
7 Okay.
8 BY MS. RONAYNE:
9 Q So you put \$250,000 down and then signed a lease
10 saying you'd pay \$600 -- I'm sorry -- six thousand,
11 five hundred thousand (sic) dollars a month more
12 beginning right then and through January 1st, 2016,
13 which is less -- you know, it's ten months -- 11
14 months away.
15 A Yeah.
16 Q So what happens then?
17 A That's -- that's the interest rate on the home
18 actually.
19 Q Six thousand five hundred dollars a month is the
20 interest rate you're paying?
21 A On a -- well, that's what he was paying on that
22 property on a two -- two million -- a two million
23 dollar loan against it. I think he pays \$5,000 and
24 the other fifteen hundred was for the taxes, so
25 that's just the three percent interest rate I think

1 Bank of America locked him into, so we are starting
2 to take over the home and show earnest money to
3 purchase it. We took over also the -- the -- the
4 interest month -- interest payments a month.
5 Q Who provided this lease for you to sign? You signed
6 it, didn't you?
7 A I think I probably did, yeah, mm-hmm. Yeah. So --
8 Q Who provided it?
9 A Harold and his lawyer.
10 Q And who represented you?
11 A Well, I have a lawyer who is -- we just actually had
12 a meeting with him and one of the things he did put
13 in the contract that he forgot to mention was that
14 that was a down payment which is --
15 Q Come on.
16 A -- supposed to be in there. Of course.
17 Q What do you mean of course?
18 A It's --
19 Q This makes no sense.
20 A Then go to the right people and find out what you
21 need to know.
22 Q Well, see, that's what my concern is. Your -- you
23 know, Debbie Frazier gives 1.1 million and then you
24 go and put \$250,000 as a down payment that's not
25 reflected anywhere and it looks like you --

1 A But they don't have to be her --
2 Q Hold on.
3 A -- we have other large --
4 Q Hold on. I'm not through.
5 A -- contributors.
6 Q I'm not through. Oh, you have other large
7 contributors that you -- give you over a million?
8 A Well, they gave it in collesbles. But I raised that
9 money on -- on the road as much as she gave as well
10 that year. That was a high year for us, but I'm
11 telling you --
12 Q Okay. But she was the big bonus.
13 A So don't look and say that that's her money because
14 that money could have come from other parts of the
15 money that came in that year, too. So don't -- don't
16 do that.
17 Q But don't you have an obligation to behave
18 responsibly with these donations?
19 A That is responsible.
20 Q It's not --
21 A I mean, that's --
22 Q Show me where -- excuse me. Show me where the
23 \$250,000 down payment and the rent-to-own comes in.
24 A Well, I will rather you get the information from
25 Michelle because the way you're making this look is

1 not -- this is responsible. You probably don't have
2 everything you need to see here, maybe you don't have
3 enough documents, but I know what we did. I signed
4 this, I remember that, and I'm a very wise business
5 man so.
6 Q This would be in direct conflict with what you've
7 told me was your intent.
8 A Well --
9 Q It didn't get reflected in this document you signed.
10 A You can say whatever you want, you know, you could
11 lie and do whatever you want.
12 Q Sir, I'm not lying. That's a document you provided.
13 A Well -- well, your opinion is a lie, you know. We
14 have total proof of all of this so it's no -- it's
15 nothing --
16 Q And you'll provide it.
17 MS. RONAYNE: Mr. Potts?
18 THE WITNESS: Total proof, of course.
19 BY MS. RONAYNE:
20 Q So when people are going to donate money, do you say
21 we want to buy a \$2.5 million house and that's why we
22 need it? Do you give them any kind of notice of what
23 your -- your game plan is for buying?
24 A No, actually, I'm very transparent with the people,
25 with the money, they know how much comes in. I tell

- 1 them as to how much we raised --
- 2 Q What people are you referring to?
- 3 A The people -- when I'm in front of them, I share with
- 4 them the money that comes in and what we're using it
- 5 for and I'm basically --
- 6 Q Did you disclose that it was going for this \$2.5
- 7 million house?
- 8 A No, because I don't have to share that. But what I
- 9 do share with them is our discussions with the banks,
- 10 what we're trying to get a loan from the bank for
- 11 about two years and were turned down by 15 and so
- 12 they wouldn't --
- 13 Q So you want more money --
- 14 A They want to --
- 15 Q You were turned down by 15 banks?
- 16 A Because they don't give money to -- in this economy
- 17 they weren't giving money to non-profits or churches.
- 18 They don't want to do that, so we were trying to find
- 19 out, you know, what would be their road of integrity
- 20 to show them earnestly, and so they said it would be
- 21 good if we had purchase property and things that
- 22 showed equity, and that's one of the reasons why the
- 23 ministry purchased that home is to start creating a
- 24 bigger portfolio before the banks so.
- 25 Q You didn't accomplish that by that document.

- 1 A We did, you just don't have everything here so you
- 2 can keep your opinion.
- 3 Q So you don't tell them that you're buying the house,
- 4 you just say we need more money to show the bank we
- 5 can borrow more money?
- 6 A Yes, I share with them about purchasing real estate
- 7 and just things like that.
- 8 Q But you --
- 9 A The things the ministry needs to do become strong
- 10 before the bank.
- 11 Q All right. So you don't say we just put a 250,000
- 12 down payment --
- 13 A Yeah, I have shared that with them.
- 14 Q On stage in your group?
- 15 A Yeah, I shared that. Yeah.
- 16 Q I thought you just said I don't have to share with
- 17 the people. I wrote that down.
- 18 A Well, it was the context you said I remember that
- 19 time, but you're asking me now did I share it with
- 20 them? I said I did. I have. I'm very open about
- 21 that.
- 22 Q All right. On March 17th, 2014, there was a check to
- 23 a Hope Jones Associates for seventy-five hundred
- 24 dollars as a retainer.
- 25 A Mm-hmm.

- 1 Q What was that for?
- 2 A That was concerning our -- they're the ones that's
- 3 basically doing the bank hunting and that kind of
- 4 thing for us.
- 5 Q The bank hunting?
- 6 A For -- I don't know what they call it, but they're --
- 7 I don't know the legal word they call it but they are
- 8 -- they are consultants and they have connections
- 9 with the banks and VIPs so.
- 10 Q With the banks and VIPs?
- 11 A Mm-hmm.
- 12 Q You have to answer yes or no.
- 13 A Yes.
- 14 Q So you're using them to do what?
- 15 A To actually find a bank that will give us a loan so
- 16 that we don't have to keep using our cash.
- 17 Q For what?
- 18 A For ministry.
- 19 Q You want to take out a loan to conduct the ministry?
- 20 A No. To build what we need.
- 21 Q What -- what is it you're building?
- 22 A I mean, we have other things we need to do,
- 23 television, a TV studio, TV -- I mean, media
- 24 everything, so it takes money to do that.
- 25 Q So you don't want to have to keep using your cash for

- 1 that?
- 2 A Right.
- 3 Q So the cash that comes in on a collection plate?
- 4 A Yes.
- 5 Q In a bucket?
- 6 A Mm-hmm.
- 7 Q Is that a --
- 8 A Using the cash, yeah, of the ministry.
- 9 Q What should the cash for the ministry be used for?
- 10 A Well, we want to be wise towards with what -- with
- 11 what God give us in the collection plate, so to keep
- 12 just spending raw cash to purchase everything, it's
- 13 hard so we're trying to develop a stronger
- 14 relationship with the banks to front us money so that
- 15 we can be a more wiser investor of what we have.
- 16 Q So you think it's better to take out a loan than to
- 17 pay for it as you go?
- 18 A Well, you know, eventually it gets very hard -- I
- 19 mean, I think it's good you pay for everything in
- 20 cash as you start out and build a foundation, but if
- 21 you're going to do bigger things, you need a
- 22 financial institution to help front money so it's
- 23 wiser.
- 24 Q And then, that's wiser to you?
- 25 A It is wiser.

1 Q And then, you don't use your cash to pay the
2 mortgage?
3 A I'm sorry, I don't understand what you're saying.
4 Q Well, if they give you a loan, it's going to be a
5 loan, right --
6 A Mm-hmm.
7 Q -- and you have to pay it?
8 A Yes.
9 Q Okay.
10 A But that gives us time. It's about time and raising
11 more finance through time. So it's -- you don't just
12 -- I mean, large corporations do this, so I'm sure
13 you know what that is.
14 Q And you compare yourself to a large corporation?
15 A Well, that's not the point. The point is about
16 wisdom, what -- how the money is used in a wise way
17 to build.
18 Q Do you have a financial consultant?
19 A Yes.
20 Q Who is that?
21 A We have financial consultants --
22 Q That's who they are?
23 A Yes.
24 Q All right. On April 29, 2014, and May 8th, 2014,
25 JMMI paid over \$6,000 for pool repairs. Where would

1 that have been done?
2 A That was at the home.
3 Q What home?
4 A The home that we purchased, the ministry purchased.
5 Q The residential center?
6 A Mm-hmm. The residential center.
7 Q And so you had to pay \$6,000 for the pool?
8 A Yeah, it -- some things were broken there so we need
9 to replace some things.
10 Q Even though you're leasing that home?
11 A No, we're purchasing the home. We're purchasing it.
12 Q Do you have a deed?
13 A No, I don't think so. But we are purchasing the
14 home.
15 Q So did you tell the donors that you were going to
16 spend \$6,000 of their donations to fix the pool?
17 A That's not how that works.
18 Q No, I'm sure it doesn't.
19 A No.
20 Q Yeah, you don't --
21 A We don't have to tell them all those details but if
22 we purchase something that the ministry is going to
23 own, we believe in keeping it up in excellence. So
24 if something is broken, we need to fix it.
25 Q All right. In July 22nd, 2014, you paid \$550 to

1 Elegant Jewelers in Birmingham, Alabama -- JMMI did.
2 What was that for?
3 A I don't know. I don't know what that -- I have no
4 knowledge of that.
5 Q Do you think you should have knowledge of it?
6 A No, I have people who are taking care of that.
7 Q So it's okay for somebody to buy jewelry?
8 A I don't think they purchased jewelry. You need to --
9 Q It's a jewelry store.
10 A You really need to go and find out what that was
11 about.
12 Q It's an Elegant Jewelers.
13 A I don't know what that was about.
14 Q Okay. Was Debbie Frazier the beneficiary of that?
15 A I don't know what that's about, I really can't say.
16 Q You don't know?
17 A No.
18 Q Do you tell your donors that you're buying jewelry?
19 A We don't buy jewelry.
20 Q Okay.
21 A What we do, we go there and we liquidate jewelry. I
22 know that, but I don't know if that was the case
23 there. So we don't --
24 Q Well, you pay them to liquidate?
25 A -- we don't -- we have bought no jewelry from nowhere

1 from what I know of, I'm not aware of that, so you
2 probably need to go ask Michelle about what that
3 purchase was instead of having another opinion that
4 breeds lies.
5 MS. RONAYNE: Mr. Potts, I would like
6 you to, if you wouldn't mind, ask him to stop using
7 that word.
8 MR. POTTS: Don't use the term lie.
9 THE WITNESS: Yeah.
10 MS. RONAYNE: Thank you.
11 MR. POTTS: Just -- you have a
12 difference of opinion, she's not lying.
13 THE WITNESS: Yeah.
14 MR. POTTS: She's asking you
15 questions.
16 THE WITNESS: Okay.
17 MR. POTTS: And you just answer them.
18 You don't have to volunteer information. Just answer
19 the question.
20 THE WITNESS: Okay.
21 MR. POTTS: If you can.
22 THE WITNESS: Okay.
23 MR. POTTS: Don't involve yourself in
24 colloquy.
25 THE WITNESS: Okay.

1 BY MS. RONAYNE:
 2 Q On July 24th, 2014, you paid a thousand dollars to
 3 the Smith Anderson Law Firm, and then another
 4 thousand dollars on October 21st, and then two
 5 thousand on March 3rd. What was that firm used for?
 6 A I don't know. I can't tell you.
 7 Q No idea what you hired a law firm for and spent
 8 \$4,000 on?
 9 A I can't tell you. You probably need to go ask
 10 Michelle.
 11 Q Jeff Wiseman was an attorney you hired also, do you
 12 recall that?
 13 A I think we -- that I do, but I'm not --
 14 Q It was just in September.
 15 A September?
 16 Q He specializes in foreclosures, things like that.
 17 A Yeah. I think that's our land attorney with this --
 18 with the Timpaige, because he stepped in to -- for
 19 the -- the forwarding of what we're doing with the
 20 home. The other two --
 21 Q For the what?
 22 A The forwarding of the purchase of the home that we
 23 are --
 24 Q What do you mean the forwarding of it?
 25 A Well, you know, the proceeding -- proceeding toward

1 doing that. We were supposed to put 20 percent down
 2 on the home, not only which you normally do when you
 3 purchase a home of that size. With a bank it's
 4 usually 500k, but we only put down 250, and we're
 5 supposed to put down the other 250 and he's the
 6 lawyer that we hired -- he's drawing up all of the
 7 contract concerning that -- with that as well so
 8 that's part of the purchase -- that's part of the
 9 process of the, I guess, the other papers you need
 10 so.
 11 Q So you're going to give this to Mr. Rosemiller
 12 \$250,000?
 13 A Yeah, that's the 20 percent down on the --
 14 Q When is that supposed to happen?
 15 A I'm not sure. They are --
 16 Q Well, if you've got the money to pay another \$250,000
 17 how about using some of that money to pay Debbie?
 18 MR. POTTS: You don't have to answer
 19 that question.
 20 THE WITNESS: Okay.
 21 MR. POTTS: That's not a question,
 22 that's a statement.
 23 BY MS. RONAYNE:
 24 Q You testified at your last deposition that JMMI owns
 25 three vehicles, a BMW, a Mercedes and a Bentley.

1 A Yes.
 2 Q Okay. Where is the BMW located?
 3 A It's inside this.
 4 Q Where?
 5 A At the residential center.
 6 Q And what about the Mercedes?
 7 A The same.
 8 Q It's at the residential center?
 9 A Yeah.
 10 Q And the Bentley?
 11 A Yes.
 12 Q Residential center?
 13 A Yes.
 14 Q And where are the keys to that located?
 15 A The same place.
 16 Q Have you driven those cars?
 17 A Yes.
 18 Q Has Michelle?
 19 A No. We need to have a driver.
 20 Q So what are those cars used for?
 21 A Basically when I have guests come in town or anytime
 22 ministry events --
 23 Q What'd you say?
 24 A Any time ministry --
 25 Q Any time?

1 A Any time --
 2 Q Oh, any time ministry is on --
 3 A There are three events we have, that kind of thing.
 4 Q What do you mean, we have that kind of thing?
 5 A I'm sorry. What did you say?
 6 Q You said, any time we have ministry events we have --
 7 A No. That kind of thing. I said that kind of thing.
 8 Q Yeah. What do mean, that kind of thing?
 9 A A ministry event.
 10 Q Right.
 11 A Mm-hmm. Something. A crusade or maybe a service or
 12 some kind of ministry function, I'll say it that way.
 13 Q In St. Louis?
 14 A It could be St. Louis. It could be here or other
 15 places. But usually we keep them residentially there
 16 in St. Louis.
 17 Q So you -- you drive like the Bentley to Detroit or
 18 Taylor?
 19 A No, we don't do that.
 20 Q All right. So are those pretty much used exclusively
 21 in St. Louis?
 22 A Mostly, exclusive in St. Louis.
 23 Q And you said we use a driver a lot, I notice that you
 24 have the driver here today. Two of them.
 25 A Yes, mm-hmm.

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- 1 Q Why do you have two drivers today?
- 2 A Well, they're not just drivers, they're just
- 3 agitants.
- 4 Q They're what?
- 5 A Agitants or --
- 6 Q Agitants?
- 7 A Or security, if you want to call it that.
- 8 Q What was the word you used?
- 9 A Agitants.
- 10 Q Agitants.
- 11 A That's a church term so let's just say security,
- 12 you'll understand that. Yes.
- 13 Q Security for whom?
- 14 A For whom?
- 15 Q Yeah. For whom?
- 16 A For me, I guess. I know the ones that are here with
- 17 me, right.
- 18 Q You require security?
- 19 A Yeah. I've -- yes.
- 20 Q Why?
- 21 A Well, I mean, doing ministry or being in the public
- 22 is very, sometimes, dangerous, and you have crazy
- 23 people out there and they have done crazy things so.
- 24 Q To you?
- 25 A Well, they try to at least.

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- 1 Q Like what?
- 2 A I mean, any minister that's in front of the masses
- 3 will go through something like that.
- 4 Q You think that any minister has security?
- 5 A I mean, the Pope has a --
- 6 Q No, he does --
- 7 A -- a thing that --
- 8 Q He actually doesn't.
- 9 A That --
- 10 Q He drives a Focus.
- 11 A No, you know, no, no. I'm talking about --
- 12 Q So you're equating yourself with the Pope?
- 13 A No.
- 14 Q Okay.
- 15 A I'm saying that -- you know that little thing he buys
- 16 costs \$2 million or however many millions that's
- 17 bullet proof, right?
- 18 Q He doesn't drive there.
- 19 A Well, somebody drives him.
- 20 Q He doesn't use it.
- 21 A Well, what I'm saying to you --
- 22 Q Hold on.
- 23 A No. That's --
- 24 Q The Pope does not use that.
- 25 A Let me say it's the Catholic church spend billions of

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- 1 dollars on security, so don't --
- 2 Q So you're saying that you're like the Catholic
- 3 church?
- 4 A No, what I'm saying the little security that I do
- 5 have, you know, don't try to degrade that because --
- 6 Q Well, I'm curious why --
- 7 A -- there are places that you all know that have
- 8 security, so it -- it's not a big deal.
- 9 Q I don't. I personally do not know of one pastor that
- 10 uses security, not one.
- 11 A That's not true.
- 12 Q Can you tell me any others that do?
- 13 A Many.
- 14 Q Name one?
- 15 A Pat Robinson.
- 16 Q Oh, you equate yourself with those folks, those TV
- 17 folks?
- 18 A Well, I -- I mean, we're all doing the same kind of
- 19 ministry basically around the world so we -- we have
- 20 security because things happen so it's important -- I
- 21 mean, I'm sure you've heard of people just coming in
- 22 churches and just shooting people and stuff so it's
- 23 important to have that --
- 24 Q It's important to have security?
- 25 A -- security, yes.

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- 1 Q Are these people armed?
- 2 A No, they are not armed.
- 3 Q So what kind of security do they provide? Are they
- 4 supposed to take a bullet?
- 5 A They're just going to help. I don't know.
- 6 Q Well, no, seriously. What -- what do you need a
- 7 security force --
- 8 A Mm-hmm.
- 9 Q -- for? Can I ask who pays for it? I mean, he's
- 10 been there all day. Two of them. So who pays for
- 11 those folks?
- 12 A Well, they are actually volunteers, those two are
- 13 volunteers.
- 14 Q And so, they aren't compensated at all?
- 15 A Well -- I mean, that ain't, you know, they
- 16 understand --
- 17 Q That ain't?
- 18 A They understand -- I'm from the countryside, I say
- 19 ain't so.
- 20 Q They understand what?
- 21 A They understand that they are volunteers and they're
- 22 here to help, but they're really greatly. They're
- 23 blessed through this ministry so they're not being
- 24 misused like you're trying to assume.
- 25 Q Well, actually, I'm -- what do you mean greatly

1 blessed through the ministry?
 2 A Well, I mean, they're compensated so.
 3 Q Okay. That's what I'm asking.
 4 A In their own way. Mm-hmm.
 5 Q How? How do you compensate?
 6 A Well, I mean, I can't tell you --
 7 Q Compensated their own way. What does that mean?
 8 A I can't tell you that money is always the best
 9 compensation. There's other things as to --
 10 Q Tell me what they are.
 11 A Well, they're getting blessed through the ministry
 12 and the work of what we're doing so -- they're
 13 families and their lives so.
 14 Q So they're blessed?
 15 A Mm-hmm.
 16 Q And that's their compensation?
 17 A It could be one of them.
 18 Q What would be another one?
 19 A I couldn't -- I don't know any other at this time.
 20 Q But you're saying you don't give them money?
 21 A Yeah, they're not on salary if that's what you're
 22 saying.
 23 Q No. Are they given any money?
 24 A No, we -- I mean, we -- they are a part of the
 25 ministry and they do benefit from being around and

1 being in different events and things we do that
 2 blesses them and their family so they're appreciative
 3 of that. It's something that you may not understand.
 4 Q I'm just wondering who -- how they pay their own
 5 bills if --
 6 A Well, you've got to ask them.
 7 Q -- they're volunteering all day?
 8 A You've got to ask them.
 9 Q But they're blessed in the ministry somehow?
 10 A You've got to ask them, yes, their life.
 11 Q The three cars that we talked about, in whose name
 12 are the titles?
 13 A They're in the ministry name.
 14 Q They're all in JMMI?
 15 A I think everything except the Bentley.
 16 Q Who's name is the Bentley in?
 17 A It's in DeWinn McDill.
 18 Q I'm sorry.
 19 A DeWinn McDill.
 20 Q I need you to spell that.
 21 A D-e-w-i-n-n.
 22 Q DeWinn?
 23 A Yes. McDill.
 24 Q And spell the last name. Is it a person?
 25 A Yeah, mm-hmm.

1 Q What's the last name?
 2 A M-c-D-i-l-l.
 3 Q DeWinn McDill.
 4 A Mm-hmm.
 5 Q And who is he?
 6 A If I'm not mistaken, he's one of the pastors in
 7 Montana that's in (inaudible).
 8 Q Pastors in Montana?
 9 A Mm-hmm.
 10 Q And he lets you keep the Bentley in St. Louis?
 11 A Yes.
 12 Q And who is authorized to drive that car?
 13 A A driver -- anybody in the ministry that's one of our
 14 drivers.
 15 Q I have a question, just from a -- you said you
 16 minister to the poor and sick and all that. Isn't it
 17 a little offensive to be driving around in a Bentley
 18 and a Mercedes to people that really, you know, are
 19 improvised and sick and ill and AIDS and drug rehab?
 20 Isn't it a little offensive to sort of be show
 21 placing --
 22 A Mm-hmm.
 23 Q -- what you have?
 24 A Well, I don't showplace to people and I'm -- I'm not
 25 using that car --

1 Q Well, a Bentley.
 2 A You don't see me driving around in that car every
 3 day. I don't do that.
 4 Q But it's in the ministry. Everybody in the ministry
 5 sees you in it. You said you drive it.
 6 A I have before, and you just asked me have I drove it,
 7 it's not something I drive every day or even every
 8 year, I don't do that. I have drivers who pick up my
 9 guests, my high profile guests, politicians, pastors,
 10 some (inaudible) --
 11 Q Who are the high profile -- high profile --
 12 A -- movie stars.
 13 Q Movie stars?
 14 A Mm-hmm.
 15 Q Who would the movie stars be?
 16 A Just different ones.
 17 Q Well, name -- name a couple.
 18 A I can name one, Richard T. Jones.
 19 Q Richard -- I'm not familiar with him. Richard T.
 20 Jones --
 21 A Mm-hmm.
 22 Q -- is a movie star?
 23 A Yeah.
 24 Q What about another one?
 25 A That's the only one I have for now.

1 Q That's the only one you know for now. Okay. And
 2 when you say a high profile guest you said
 3 politicians.
 4 A Yeah.
 5 Q Who would that be?
 6 A If it's a politician that would be one.
 7 Q Name -- name me a couple of those.
 8 A He the -- what's -- Gill -- he used to -- but he's
 9 not no more, he's out of office now. But he used to
 10 be the -- I think the Secretary of Agriculture in
 11 that place at the -- at the Capitol.
 12 Q The Secretary of Agriculture?
 13 A Yeah.
 14 Q You picked up in -- in a Bentley from the --
 15 A No, I didn't say I did that but --
 16 Q He came --
 17 A It would be people who I would know like that.
 18 Q Okay. Give me a couple names that you need a Bentley
 19 to drive around in?
 20 A Well, I can't give you that. No.
 21 Q You can't?
 22 A No. No.
 23 Q Well, do you see my point that people that --
 24 A Mm-hmm.
 25 Q -- are suffering and getting whatever their last dime

1 is and --
 2 A Mm-hmm.
 3 Q -- donations and, you know, drug habits, to have them
 4 see you drive around your high profile guests in a
 5 Bentley or Mercedes might be offensive, and hopefully
 6 --
 7 A It could be offensive if they didn't know my life.
 8 Q Oh.
 9 A But they know my life. It would be offensive for
 10 someone like you who's trying to make it bad, you
 11 know, but, you know, because your attitude --
 12 Q So it's important to have a Bentley?
 13 A It ain't really important, that don't make me.
 14 Q Okay.
 15 A Okay.
 16 Q Then you also have a Land Rover that you lease.
 17 A Range Rover.
 18 Q Range Rover.
 19 A Yes, it's not a Land Rover. It's a Range Rover.
 20 Q Which is the better one? I don't even know.
 21 A I don't know. They're just cars, that's all.
 22 Q All right. Then there's a series of documents that
 23 total almost \$50,000.
 24 A Mm-hmm.
 25 Q To Limoland.

1 A Mm-hmm.
 2 Q In 2013 and '14.
 3 A Mm-hmm.
 4 Q You have to answer yes instead of --
 5 A Yes, uh-huh.
 6 Q Okay.
 7 MS. RONAYNE: Let's mark these as an
 8 exhibit.
 9 (WHEREUPON, Defendant's Deposition
 10 Exhibit Number Three was marked for identification at
 11 4:11 p.m.)
 12 BY MS. RONAYNE:
 13 Q And I'll ask you to identify this. This came from
 14 Joshua Media Ministries, did it not?
 15 A Yes, mm-hmm.
 16 Q Okay. And it deals with October 1st to October 31st.
 17 A Okay.
 18 Q Could you acknowledge that on the top?
 19 A Yes, mm-hmm.
 20 Q Okay. October 9th, 2013, there was \$10,000 paid to
 21 Limoland.
 22 A Yes.
 23 Q And that's in St. Louis?
 24 A No. That should be in Springfield, not Springfield,
 25 but in Missouri somewhere. It's not in St. Louis.

1 Q But it's in --
 2 A It's in Missouri.
 3 Q The state of Missouri?
 4 A Mm-hmm.
 5 Q You have to answer yes.
 6 A Yeah, mm-hmm.
 7 Q Okay. What was that for?
 8 A That was to cut the Mercedes into a limo.
 9 Q It was to cut the Mercedes --
 10 A -- into a limo.
 11 Q And who needs that?
 12 A No, that's for guests.
 13 Q It's for guests and for you?
 14 A It's mostly for guests.
 15 Q When you're entertaining guests.
 16 A Yes.
 17 Q When you're entertaining?
 18 A Well, not -- when we have guests come in, high
 19 profile people, we --
 20 Q You have to have a limo?
 21 A -- treat them that way. We don't have a limo but --
 22 Q And a Mercedes limo.
 23 A Mm-hmm. We treat them --
 24 Q You treat them?
 25 A I said that we -- we have hospitality, maybe that's a

1 better word.
 2 Q Okay. Then --
 3 A And this is not the first one the ministry's had.
 4 Q Oh, there's a --
 5 A There is another Mercedes limousine. That's right.
 6 So --
 7 Q What happened to that? What happened to that one?
 8 A I gave up everything so that I could do ministry on a
 9 high level.
 10 Q You gave up everything?
 11 A Mm-hmm.
 12 Q You have to answer yes or no.
 13 A Yes, mm-hmm.
 14 Q What does that mean you gave up everything?
 15 A Well, you know, I didn't have to but I voluntarily
 16 reduced my whole life so that I could -- that was in
 17 2005 to 2007 -- so that I could --
 18 Q About the time you filed bankruptcy?
 19 A Well, I had to because of the -- the -- me trying to
 20 give up the home and some other stuff, I shouldn't
 21 have even --
 22 Q What do you mean? What do you mean me trying to give
 23 up the home?
 24 A Well, I mean, basically I --
 25 Q Went bankrupt?

1 A No, not really. I --
 2 Q Not really?
 3 A It was bad advice. Just someone gave bad advice and
 4 --
 5 Q But you filed for bankruptcy and were adjudicated to
 6 bankrupt.
 7 A Yeah. But it was just bad advice I --
 8 Q So you call giving up --
 9 A I didn't do that.
 10 Q -- everything buying a 2.5 million house and having a
 11 Bentley and a Mercedes and a limo?
 12 A No, it was years ago what I'm saying, so you're
 13 trying to say --
 14 Q What was years ago?
 15 A -- is you're not -- you're not --
 16 Q Well, tell me what was years ago? I don't
 17 understand.
 18 A In -- I gave you the dates. The -- I mean, the date
 19 -- I mean --
 20 Q When you went bankrupt?
 21 A -- the years --
 22 Q About that time when you decided to scale back, is
 23 that what you're saying?
 24 A Yeah, but it wasn't -- I didn't file bankruptcy
 25 because we were -- because of that. That wasn't --

1 Q Well, no, you had debt.
 2 A Well, yes --
 3 Q You wanted to discharge debt?
 4 A No, no, it just wasn't that actually.
 5 Q What was it?
 6 A It was cutting back so that I could reach more people
 7 in the ministry.
 8 Q Okay. You're going to have to explain to me how
 9 filing bankruptcy is cutting back so that you can --
 10 A I never said that. You're putting words in my mouth.
 11 THE WITNESS: She's lying again.
 12 MS. RONAYNE: Can you read that back?
 13 THE WITNESS: Yeah.
 14 BY MS. RONAYNE:
 15 Q So then you spent another \$5,000 -- I'm looking for
 16 it.
 17 COURT REPORTER: Did you want to play
 18 back or are you --
 19 MS. RONAYNE: No, that's okay. I know
 20 what he said.
 21 REPORTER: Okay. Repeat that then,
 22 what you said earlier.
 23 MS. RONAYNE: Okay.
 24 BY MS. RONAYNE:
 25 Q So you paid Limoland almost \$50,000 total.

1 A Almost 50,000.
 2 Q And that was for what, to make a limo?
 3 A To cut the Mercedes into a limo.
 4 Q And you think that was a good use of the money that
 5 people donated to you and JMMI?
 6 A Well, I mean, the banks certainly have looked at that
 7 on our books as good because it has an appraisal
 8 value of almost 200k with over 150,000.
 9 Q What year is the Mercedes?
 10 A I don't know. I forget what year that is.
 11 Q So did you at all mention to Mrs. Frazier when she
 12 gave you her million dollars that you were going to
 13 use almost 50,000 of ministry money to make a limo?
 14 A We didn't use her money to make a limo.
 15 Q Yeah. But did you tell her --
 16 A We had money besides her money.
 17 Q But did you tell her that you're going to use that
 18 ministry money for a limo?
 19 A Again, I want to say to you, for the record, that her
 20 money was not used for a limo. We brought in way
 21 more money than --
 22 Q From donations?
 23 A -- just from donations.
 24 Q Some donors?
 25 A It don't matter. The point is, the ministry brought

1 that in and so you cannot tell us how we allocated
 2 that and used her money for that, so her money went
 3 to a whole system of things so.
 4 Q But you got this from donations and you decided to
 5 use it to make a limo?
 6 A We really invested really good, the banks use that --
 7 Q No. I'm just asking if that's what you did?
 8 A No, not the way you're saying it. It's -- you're
 9 fortifying -- forging that.
 10 Q I'm forging?
 11 A Oh, yeah. You are, I mean, with your mouth, yeah.
 12 MR. POTTS: Just -- the question is --
 13 THE WITNESS: Okay.
 14 MR. POTTS: -- did you use the money
 15 for the purpose --
 16 THE WITNESS: No. So --
 17 MR. POTTS: The answer's yes.
 18 BY MS. RONAYNE:
 19 Q Yeah, you got donations and you used the money --
 20 MR. POTTS: You got the money, you
 21 used the money?
 22 THE WITNESS: Of course I used it.
 23 But then --
 24 MR. POTTS: That's enough.
 25 THE WITNESS: Okay.

1 MR. POTTS: You don't have to to go
 2 through a defensive mechanism.
 3 THE WITNESS: Okay.
 4 MR. POTTS: You got the money, you
 5 used the money.
 6 THE WITNESS: What about the way she's
 7 making this sound.
 8 MR. POTTS: Don't worry about that.
 9 Just answer the question.
 10 THE WITNESS: Yeah. Okay. I won't --
 11 MR. POTTS: I can deal with the spin
 12 part of it.
 13 THE WITNESS: Okay.
 14 MS. RONAYNE: All right.
 15 MR. POTTS: You just answer the
 16 question, and don't get argumentative.
 17 THE WITNESS: Okay.
 18 BY MS. RONAYNE:
 19 Q We're going to show you a bunch of JMMI bank
 20 statements and --
 21 MS. RONAYNE: So that would be four.
 22 BY MS. RONAYNE:
 23 Q -- and they're going to show clothing charges --
 24 A Mm-hmm.
 25 Q -- by JMMI.

1 A Yes.
 2 Q Do you spend any of your salary on clothing?
 3 A Some.
 4 (WHEREUPON, Defendant's Deposition
 5 Exhibit Number Four was marked for identification at
 6 4:18 p.m.)
 7 BY MS. RONAYNE:
 8 Q I'm going to show you Exhibit Number Four, and on
 9 November 29th, 2013, JMMI paid over \$6,000 to Louis
 10 Vautton.
 11 A Yes.
 12 Q What would that be for?
 13 A Well, this is for clothes concerning my TV ministry
 14 as well.
 15 Q So you have to wear Louis Vuitton?
 16 A It don't matter what name it is. The point is, the
 17 clothing are allocated to us for ministry purposes as
 18 well.
 19 Q What do you mean they're allocated to you?
 20 A You know, in the media ministry.
 21 Q In the what?
 22 A Media ministry.
 23 Q Yeah.
 24 Okay. Or on the road when I'm always
 25 traveling and using my clothes, I'm sweating through

1 them so I'm needing new clothes also for television
 2 ministry including yourself.
 3 Q And so you use ministry money to buy your wardrobe?
 4 A Outfit.
 5 Q Your out --
 6 A It's called -- allocated more towards ministry
 7 apparel.
 8 Q Okay. And where is that kept?
 9 A In St. Louis.
 10 Q In your home?
 11 A Yes, mm-hmm.
 12 Q Okay. And do you get -- does that go into what your
 13 income is?
 14 A I'm sorry?
 15 Q Do you show that in your income that you got Louis
 16 Vuitton clothing?
 17 A No, that's not -- that's --
 18 Q That doesn't show?
 19 A Because it don't go there.
 20 Q It don't go there?
 21 A Mm-hmm.
 22 Q I don't know what that means.
 23 A It don't belong there, that's out of place.
 24 Q What's out of place?
 25 A You don't get taxable things like that. That's for

1 -- that's for ministry business purpose so it's
 2 not --
 3 Q Louis Vuitton?
 4 A Well, it's -- you can call whatever you want.
 5 Q Well, then, you had a month later Men's Warehouse for
 6 a thousand dollars. Were these for you?
 7 A Yeah, those were suits for the TV ministry.
 8 Q And do you wear them when you're not on the TV?
 9 A No. Only to ministry in them when I'm traveling.
 10 Q Right. When you're on TV or otherwise you wear them?
 11 A Yeah, television ministry.
 12 Q But not always when you're just on TV?
 13 A Always, either I'm being filmed, when I'm up
 14 traveling around the nation or --
 15 Q So -- but like with those you're wearing now, are
 16 those purchased by JMMI?
 17 A No, this was actually purchased by me.
 18 Q Okay. Then you spent another \$724 for the Italian
 19 Collection clothes.
 20 A Mm-hmm.
 21 Q In April.
 22 A Yeah, I'm always buying suits.
 23 Q Always?
 24 A Well, not always.
 25 Q Always buying suits.

1 A But whenever we need -- when we need them so.
 2 Q Whenever we -- isn't it just you?
 3 A Well, I mean, because I'm the main one out front, you
 4 know. Other than that, I would sweat through all of
 5 my personal clothes and they wouldn't last long, so
 6 the ministry can buy --
 7 Q Who else does the ministry buy clothes --
 8 A Well, the ministry team, if they need suits or things
 9 for uniforms for the ministry so.
 10 Q Uniforms?
 11 A Mm-hmm.
 12 Q What kind -- you have to answer --
 13 A Black suits or anything that goes for choir or
 14 ushering or --
 15 Q Your person out there that's a driver, do you buy his
 16 black suit?
 17 A I don't -- I'm not quite sure if that was bought --
 18 oh, no, they paid for that one their selves on -- I
 19 can't tell you. But we do -- we have purchased suits
 20 for people because they work and it could be wearing
 21 down your personal clothing, tear them up so.
 22 Q So June 2014 you spent thirty-five hundred dollars by
 23 JMMI to Versace in the Bahamas.
 24 A Mm-hmm.
 25 Q Yes?

1 A I'm sure that's right if that's what it shows there.
 2 Q And those were -- that was clothing for you?
 3 A Yes. Probably, yes, mostly for --
 4 Q But you --you don't see that there's any problem when
 5 you're ministering to the poor or the sick, the
 6 needy, to be appearing in Louis Vuitton and Versace?
 7 A Well, that ain't something I purchase all the time.
 8 Q Well, it looks like you did several times in --
 9 A I mean, I -- I'm a very frugal person when it comes
 10 to this. I go to the right places to get a lot of
 11 suits and if I get some from those places, you don't
 12 see that.
 13 Q I don't see Macy's.
 14 A No, you don't see that -- yeah, because Macy's don't
 15 have the kind of suits that I wear. But what I'm
 16 saying is, this -- this Louis Vuitton things, you
 17 don't see that in our charges all the time. We used
 18 to get the belts --
 19 Q Well, I see in 2000 and -- get the belts?
 20 A Yes.
 21 Q In 2000 -- I see you're wearing a Burberry belt? The
 22 same kind of thing, you go to the top of line?
 23 That's an expensive belt.
 24 A Well, that's the way you're making it look quite
 25 true, yeah.

1 Q 2013 and '14 you spent over -- JMMI spent over
 2 \$30,000 in your clothes. Does that sound about
 3 right?
 4 A What -- what year was that?
 5 Q '13 and '14.
 6 A Oh, God, yes, because I was traveling so much and --
 7 and sweating through all my clothes. Exactly. That
 8 probably wasn't enough because just to have so --
 9 Q But they have to be top of the line expensive ones?
 10 A No, they are not top of the line clothes.
 11 Q Louis Vuitton is not top of the line?
 12 A That is not where I get my suits from.
 13 Q Well, you got something from him --
 14 A Yeah.
 15 Q -- you spent thousands and thousands?
 16 A Well, the -- the belts are more lasting so that's
 17 good.
 18 Q Come on, you're buying belts for \$5,000?
 19 A No. I mean --
 20 Q Okay.
 21 A -- I have multiple belts, not just one.
 22 MR. POTTS: Just so the record
 23 reflects --
 24 THE WITNESS: Yeah.
 25 MR. POTTS: There's an entry at Joe

1 Banks here June 11th of '14, one of the bottom
2 feeding stores in the United States.
3 BY MS. RONAYNE:
4 Q Well, how about --
5 MR. POTTS: I'd just like to call your
6 attention to that one, too.
7 BY MS. RONAYNE:
8 Q How about the Gucci Store in August?
9 MR. POTTS: Just thing about Joe
10 Banks.
11 MS. RONAYNE: No, we'll get to that.
12 BY MS. RONAYNE:
13 Q August 2014 you went to the Gucci Store in Troy and
14 purchased something?
15 A Yeah.
16 Q What would that be?
17 A As I said, it probably was a belt or maybe shoes. I
18 don't know.
19 Q Belts or shoes.
20 A But I don't usually buy my suits from these very
21 expensive places. I just get the -- the things that
22 I invest in will last longer such as belts or shoes.
23 Q So you've got to go to Gucci or places like that?
24 A Well, no, that's -- I buy those things from there
25 because they have a better TV appearance for the

1 belts and --
2 Q For asking for money from the poor?
3 A I mean, honestly, it ain't really like the way you're
4 making it look so.
5 Q Tell me how it is.
6 A Well, I mean, I don't think you want to hear what we
7 could say --
8 Q Well, you sound like you have to drive Bentley's and
9 limousines and wear Gucci.
10 MR. POTTS: Just answer if there's a
11 question asked of you, answer the question. The rest
12 of it's just (inaudible) play --
13 BY MS. RONAYNE:
14 Q You like to look like money?
15 A No, no. No, it's --
16 Q You paid a thousand dollars to Monsieur Clothing in
17 New York and then another \$715. Whose clothing was
18 that for?
19 A Where was that now? I don't understand.
20 Q August 1st and October 28th, a total of over
21 seventeen hundred dollars to Monsieur Clothing in New
22 York?
23 A I don't -- I do not -- I don't know about that.
24 Q All right. Let's talk about Debbie Frazier and the
25 payment of your legal fees.

1 A Go ahead. What is that?
2 Q Did Debbie Frazier in any way whatsoever contribute
3 to the payment of any of your legal fees?
4 A Yes, but actually I didn't know she would do that
5 until afterwards so.
6 Q What do you mean? When was it and to whom?
7 MR. POTTS: You don't have to answer
8 that question.
9 THE WITNESS: Okay.
10 MS. RONAYNE: It's not privileged.
11 MR. POTTS: Yes, it is.
12 MS. RONAYNE: If Debbie Frazier --
13 MR. POTTS: Anything related to his
14 legal fees. How, what, amount, when, how. It's
15 privilege.
16 MS. RONAYNE: I will ask the Court
17 about that because it's not --
18 MR. POTTS: It is.
19 MS. RONAYNE: -- attorney client
20 privilege.
21 MR. POTTS: Once you start -- once you
22 start talking about how much, the nature of the
23 engagement, dates and times and places, it's
24 privilege.
25 MS. RONAYNE: Okay.

1 BY MS. RONAYNE:
2 Q Here there is --
3 MR. POTTS: You can ask questions that
4 are not related to what happens between him and his
5 counsel or lawyers.
6 MS. RONAYNE: I'm not asking about
7 between him and his counsel.
8 MR. POTTS: Yes, you are.
9 MS. RONAYNE: No, no, no.
10 MR. POTTS: You're getting -- right
11 there.
12 MS. RONAYNE: I asked who paid it.
13 BY MS. RONAYNE:
14 Q Now, for example, on August 27th, 2000 and --
15 MR. POTTS: You can say if he knows
16 did someone pay a sum certain on a date, if he knows.
17 MS. RONAYNE: Okay.
18 MR. POTTS: If he doesn't know, then
19 he can't answer the question.
20 MS. RONAYNE: All right.
21 BY MS. RONAYNE:
22 Q Well, what you said was you didn't know it at the
23 time but you became aware of it later, correct?
24 THE WITNESS: Do I answer?
25 MS. RONAYNE: That's what he said.

1 MR. POTTS: Answer that question.
 2 THE WITNESS: Yes.
 3 MR. POTTS: Yes, you can answer that.
 4 BY MS. RONAYNE:
 5 Q And what did you find out later?
 6 MR. POTTS: Objection.
 7 THE WITNESS: Yeah.
 8 MS. RONAYNE: On what basis?
 9 MR. POTTS: Privilege, attorney client
 10 privilege.
 11 MS. RONAYNE: I don't think it's an
 12 attorney client --
 13 MR. POTTS: I do.
 14 MS. RONAYNE: Well, hold on.
 15 MR. POTTS: (Inaudible).
 16 MS. RONAYNE: Debbie Frazier.
 17 MR. POTTS: No. What did he determine
 18 about payment of his attorney fee.
 19 MS. RONAYNE: I'm asking him what
 20 Debbie Frazier -- what he found out about Debbie
 21 Frazier.
 22 MR. POTTS: What she told him, if she
 23 told him --
 24 BY MS. RONAYNE:
 25 Q Do you know that Debbie Frazier paid your attorney

1 Q Would that be the Hertz Schram people or some other
 2 lawsuit?
 3 A I don't know. I'm not sure.
 4 Q Well, is there some other lawsuit that you're
 5 involved in?
 6 A Not that I know of, no.
 7 Q So was it your understanding that Debbie Frazier paid
 8 your legal fees to Hertz Schram as invoiced in and
 9 out on the JMMI --
 10 A I understand -- I don't know who it was given to, I
 11 just heard that it happened so you will probably want
 12 to ask Michelle that.
 13 Q When did you hear this?
 14 A I can't remember. I -- I don't know exactly.
 15 Q Who did you hear it from?
 16 A Michelle shared it with me.
 17 Q So Michelle told you that Debbie Frazier paid your
 18 legal fees?
 19 A Yeah.
 20 Q And you see this here where it says, seventy-five
 21 hundred dollars coming in.
 22 A Okay. I see that.
 23 Q And then on the same day seventy --
 24 A What is this now? Is this -- what account is --
 25 Q This is from you. This is JMMI.

1 fees?
 2 MR. POTTS: If you know.
 3 THE WITNESS: Yes, I found out.
 4 BY MS. RONAYNE:
 5 Q Yes, you found that out, in the amount of seventy-
 6 five hundred dollars?
 7 A I don't know if -- exactly how much it was.
 8 Q Well, there's -- August 2014 there is a seventy-five
 9 hundred dollar deposit, and then in September of --
 10 actually I have fake lenses in there that are
 11 supposed to be able to let me do this -- on the same
 12 day, in come seventy-five hundred dollars and out
 13 goes seventy-five hundred dollars, Frazier versus
 14 Frazier retainer fee for Hertz Schram. So is it your
 15 understanding -- and this is JMMI documents, that
 16 Debbie Frazier gave you the seventy-five hundred
 17 dollars on your behalf?
 18 A Not that I know of, no.
 19 Q Well, what did you find out later?
 20 A I just found out that she paid for some legal fees
 21 for me to have an attorney so that --
 22 MR. POTTS: Is that all?
 23 THE WITNESS: -- all the details I
 24 know, yes.
 25 BY MS. RONAYNE:

1 A Oh, okay.
 2 Q And then --
 3 VIDEOGRAPHER: We are going off the
 4 record, it is 4:30 p.m.
 5 (WHEREUPON, a brief recess was held at
 6 4:30 p.m. to 4:32 p.m.)
 7 VIDEOGRAPHER: We are back on the
 8 record, it is 4:32 p.m.
 9 BY MS. RONAYNE:
 10 Q All right. So I'm going to show you documents from
 11 JMMI about bank transactions.
 12 A Okay.
 13 Q And do you acknowledge that this is August 27th,
 14 2014?
 15 A Yes, mm-hmm.
 16 Q And under source is says source not disclosed yet.
 17 Do you see that?
 18 A Mm-hmm.
 19 Q You have to answer yes or no.
 20 A Yes, mm-hmm.
 21 Q And you see seventy-five hundred dollars?
 22 A Right.
 23 Q And then on the same day, August 27th, 2014, it says
 24 "Schram check retainer fee for Frazier versus
 25 Frazier," correct?

1 A Yes, mm-hmm.
 2 Q And seventy-five hundred dollars.
 3 A Yes, mm-hmm.
 4 Q Is it your understanding, from talking to Michelle,
 5 that that seventy-five hundred dollars that came in
 6 and then was routed out to pay Hertz Schram was in
 7 fact Debbie Frazier paying for your attorney fees?
 8 A No, she didn't share with me the details of that, so
 9 I'm seeing this here but did -- I was never told. I
 10 was just told that she gave it.
 11 Q But she didn't pay your fees.
 12 A Yes.
 13 Q And that it was about the August 27th time?
 14 A I can't remember if it was the day or not.
 15 Q Okay.
 16 A I'm sure you can --
 17 Q But in this timeframe, at any rate, because it
 18 wouldn't have been any other time you retained Hertz
 19 Schram was it?
 20 A No, but I don't know --
 21 MR. POTTS: Who retained Hertz Schram.
 22 MS. RONAYNE: He.
 23 MR. POTTS: But she had
 24 contemporaneously to this.
 25 MS. RONAYNE: Right. But I'm talking

1 about through JMML. It wasn't done -- her retainer
 2 wasn't --
 3 MR. POTTS: Just so that it's clear
 4 that there was also the retention.
 5 MS. RONAYNE: Well, that's separate.
 6 MR. POTTS: At another time and space.
 7 BY MS. RONAYNE:
 8 Q Debbie Frazier's legal fees were not paid for by
 9 JMML, were they?
 10 A Not that I know of.
 11 Q Okay.
 12 A I don't -- I don't have a recollection.
 13 Q So would it be a reasonable conclusion that this
 14 seventy-five hundred dollars that went in and then
 15 went back out for Hertz Schram was sourced through
 16 Debbie Frazier?
 17 MR. POTTS: Objection, you don't have
 18 to answer that. It calls for speculation. You don't
 19 have to answer -- conclude anything.
 20 THE WITNESS: Okay.
 21 BY MS. RONAYNE:
 22 Q Do you have any information otherwise?
 23 A (No verbal response.)
 24 MR. POTTS: We've got to go, guys.
 25 MS. RONAYNE: Okay.

1 BY MS. RONAYNE:
 2 Q You testified that -- at your last deposition that
 3 Mrs. Frazier never gave you cash?
 4 A Yeah.
 5 Q Okay. And --
 6 MR. POTTS: That was asked earlier
 7 today, too.
 8 MS. RONAYNE: Right.
 9 BY MS. RONAYNE:
 10 Q However, Mrs. Frazier testified just last week that
 11 in October, just four months ago, that she gave JMML
 12 \$15,000 in cash.
 13 A I had no idea about it. It didn't come to me.
 14 Q You had no idea you were given \$15,000 in cash?
 15 A No.
 16 MR. POTTS: He was not given.
 17 THE WITNESS: I was not given any.
 18 MR. POTTS: He was not given any.
 19 BY MS. RONAYNE:
 20 Q JMML, when I say --
 21 MR. POTTS: If it comes --
 22 THE WITNESS: I don't know what comes
 23 in the offer plate until they count it in the back
 24 and --
 25 BY MS. RONAYNE:

1 Q You have no idea?
 2 A I'm not over all of that, no.
 3 Q So when you were asked if she had ever given you
 4 cash, you're saying that you had no idea that Debbie
 5 had just given you \$15,000 in cash 30 days earlier?
 6 A No.
 7 Q Your IRS tax exempt paperwork --
 8 MR. POTTS: You know, this -- you know
 9 that's not a continuation of the conversation. Can't
 10 we just do what we said we were going to do. It's
 11 now past 4:30 and I'm done right now.
 12 MS. RONAYNE: Yeah. That's all right.
 13 MR. POTTS: Okay.
 14 VIDEOGRAPHER: This concludes the
 15 deposition for the day. It is 4:36 p.m., we are off
 16 the record.
 17 (WHEREUPON, the deposition was
 18 concluded at 4:36 p.m.)
 19
 20
 21
 22
 23
 24
 25

1 STATE OF MICHIGAN)
2) SS
3 COUNTY OF OAKLAND)
4 C E R T I F I C A T E
5 I hereby certify that this transcript,
6 consisting of two hundred forty-six (246) pages,
7 represents the complete, true, and correct rendition
8 of the recording of the proceedings and testimony
9 taken in this case as recorded on February 10, 2015.
10 I further state that I assume no
11 responsibility for any events that occurred during
12 the above proceedings or any inaudible responses by
13 any party or parties that are not discernible in the
14 recording of the proceedings.
15
16 Karen Robinson
17 Karen Robinson, CER #5579
18 Certified Electronic Reporter
3133 Union Lake Road
Commerce Twp., Michigan 48324
(248) 360-2145
19
20 Date: February 23, 2015
21
22
23
24
25

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