

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

DEBORAH ANN FRAZIER,

Plaintiff,

Case No. 2010-773215-DM

vs.

Hon. Karen McDonald

RICKY ALAN FRAZIER,

Defendant,

/

DEPOSITION OF DAVID E. TAYLOR

Taken by the Defendant at the law offices of Colleen V.

Ronayne, located at 2055 Orchard Lake Road, Sylvan Lake,

Michigan, 48320, on Wednesday, November 12, 2014, commencing

at 1:00 p.m.

1 APPEARANCES:
 2
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 18 For David E. Taylor: GERALD P. CAVELLIER (P54753)
 19 1760 S. Telegraph Road, Suite 300
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 22
 23 Also Present: RICKY FRAZIER
 24
 25 VIDEOGRAPHED BY: VIDEO ENTERPRISE
 RECORDED BY: REGENCY COURT REPORTING
 3133 Union Lake Road, Ste. A
 Commerce Township, MI 48382
 (248) 360-2145

1 Sylvan Lake, Michigan
 2 Wednesday, November 12, 2014 - 2:41 p.m.
 3 * * * * *
 4 VIDEOGRAPHER: We're on the record.
 5 The time now is 2:41 p.m., in the matter of Deborah
 6 Ann Frazier versus Ricky Alan Frazier, case number
 7 2010-773215-DM. This is the videotaped deposition of
 8 David E. Taylor, being taken at 2055 Orchard Lake
 9 Road, Sylvan, Michigan; the date is November 12th,
 10 2014. My name is Ed Boike, legal videographer.
 11 Counsel, please introduce themselves
 12 for the record.
 13 MS. RONAYNE: Colleen Ronayne,
 14 appearing on behalf of Rick Frazier.
 15 MR. CAVELLIER: Jerry Cavellier, on
 16 behalf of David E. Taylor.
 17 MR. JENKINS: Steve Jenkins, appearing
 18 on behalf of Deborah Frazier.
 19 MR. YATOOMA: Gregory Yatooma, on
 20 behalf of Rick Frazier.
 21 VIDEOGRAPHER: Please have the witness
 22 sworn.
 23 COURT REPORTER: Would you please
 24 raise your right hand? Do you solemnly swear or
 25 affirm to tell the truth, the whole truth, and

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1 nothing but the truth, so help you God?
 2 MR. TAYLOR: Yes.
 3 COURT REPORTER: Thank you.
 4 MS. RONAYNE: Just for the record, Mr.
 5 Taylor, you also go by the name of The Apostle?
 6 THE WITNESS: Yes.
 7 MS. RONAYNE: Okay.
 8 I would like to start by going over
 9 the records pursuant to the subpoena that we
 10 received, and clarify that we have what we've asked
 11 for. Thank you.
 12 I would state for the record that we
 13 have acknowledged that due to the time constraints
 14 and that we just received some of the documents that
 15 were kind of later than we expected is that we're
 16 going to have to continue this deposition, and
 17 everyone has agreed on a date of January 9th, 2015 at
 18 10:00 a.m.; is that correct, Mr. Cavellier, Mr.
 19 Jenkins?
 20 MR. CAVELLIER: Right.
 21 MR. JENKINS: Correct.
 22 MS. RONAYNE: And Mr. Yatooma, whether
 23 you're here or not.
 24 I have prepared an order, my secretary
 25 has, regarding the deposition and the continuing

1 jurisdiction of the court, and I would just ask the
2 attorneys to sign it. It's the same format as
3 before.

4 And Mr. Taylor, you've stated that you
5 are not in Michigan in November and December?

6 THE WITNESS: No, no.

7 MS. RONAYNE: Is that correct?

8 THE WITNESS: Yes.

9 MS. RONAYNE: Speak a little louder.

10 THE WITNESS: Yes.

11 MS. RONAYNE: All right. So you're
12 not in -- in Michigan in November or December of
13 2014?

14 THE WITNESS: No.

15 MS. RONAYNE: That's correct?

16 THE WITNESS: Yes.

17 MS. RONAYNE: And so you're saying
18 you're not available for the deposition to be
19 continued in either November or December?

20 THE WITNESS: No.

21 MS. RONAYNE: I think the answer is
22 supposed to be yes; can we kind of -- I think he's
23 getting confused --

24 MR. CAVELLIER: Just to be clear, you
25 have no availability in November or December --

1 during December and November; you're saying you're
2 not going to be.

3 THE WITNESS: Well, like I told you,
4 One Night with the King --

5 MS. RONAYNE: Right.

6 THE WITNESS: -- is just one day and
7 I'm out, so --

8 MS. RONAYNE: That's December 31st --

9 THE WITNESS: Mm-hmm.

10 MS. RONAYNE: And is that in Michigan?

11 THE WITNESS: Yes.

12 MS. RONAYNE: All right. I just want
13 to go over the subpoena duces tecum so I can make
14 sure that we have all the documents. And the first
15 one is all records showing Mrs. Deborah Frazier's
16 donation -- donations to Joshua Media Ministries
17 International, JMMI, and/or any of its affiliates in
18 2012, '13, and '14, including but not limited to bank
19 statements, money market accounts, certificates of
20 deposit, et cetera. And I would note that it -- may
21 I ask you to identify this and tell if that's what
22 you're saying is in satisfaction of number one under
23 the subpoena duces tecum?

24 MR. CAVELLIER: You're asking me to
25 identify a JMMI document --

1 THE WITNESS: Right; exactly.

2 MR. CAVELLIER: -- to continue this
3 dep?

4 THE WITNESS: No, I do not.

5 MR. CAVELLIER: And the first -- and
6 the first available date is January 9th, 2015?

7 THE WITNESS: Yes. Right.

8 MR. CAVELLIER: Okay.

9 MS. RONAYNE: Okay. And that you're
10 not going to be in Michigan November or December?

11 THE WITNESS: No, not that I'm
12 scheduled to be.

13 MS. RONAYNE: Does that mean that you
14 may possibly be?

15 THE WITNESS: No.

16 MR. CAVELLIER: Well, object.

17 Anything's possible. His schedule --

18 MS. RONAYNE: Well --

19 MR. CAVELLIER: -- reflects that his
20 first available date is January 9th, and that's what
21 we've agreed to.

22 MS. RONAYNE: I'm -- I'm --

23 THE WITNESS: Yes.

24 MS. RONAYNE: -- focusing on being in
25 -- in Detroit or Redford or this -- or Michigan

1 MS. RONAYNE: You produced it to me I
2 -- in compliance with the subpoena. I'm just asking
3 you to tell me if that's what you're suggesting is in
4 compliance with number one under the subpoena.

5 MR. CAVELLIER: Okay. This is in
6 partial compliance --

7 MS. RONAYNE: Okay.

8 MR. CAVELLIER: In addition to this,
9 the 990s' reflect --

10 MS. RONAYNE: Hold on --

11 MR. CAVELLIER: -- the contributions
12 for 2012 and '13. '14's are not available --

13 MS. RONAYNE: Well, hold -- please --

14 MR. CAVELLIER: In addition, there's a
15 ledger --

16 MS. RONAYNE: Please hold. I'm trying
17 to pull the documents and have them identified.

18 Do you have -- all right, so we -- so
19 in compliance with the first issue and -- and
20 itemization on the subpoena duces tecum, we have the
21 990s, and I'm sorry, what did you say --

22 MR. CAVELLIER: The internal summary,
23 and the ledger that's 133 pages. I also provided a
24 ledger to you on disk for your convenience.

25 MR. FRAZIER: The ledger starts in

1 July of 2013 that we got --
 2 MS. RONAYNE: That's not --
 3 MR. FRAZIER: -- then go into 2012.
 4 MS. RONAYNE: I -- just we have the
 5 ledger starting in July of 2013. So we're missing a
 6 year and a half.
 7 MR. CAVELLIER: Well, if it's not on
 8 the disk, I'll agree to provide it.
 9 MS. RONAYNE: You -- can you tell by
 10 looking at what you have if it's there, by the dates?
 11 MR. CAVELLIER: This appears to be
 12 dated July 1st, 2013, and conclude November of '014.
 13 MS. RONAYNE: All right. So you agree
 14 that it would appear that we're missing July -- I'm
 15 sorry, we're missing 2012 and up until July 2013?
 16 MR. FRAZIER: June 30th, 2013.
 17 MS. RONAYNE: June 30th; I'm sorry.
 18 MR. CAVELLIER: Yes, and if it's not
 19 on the disk, I'll be sure to provide those additional
 20 dates.
 21 MS. RONAYNE: Okay. Can I have a --
 22 you tell me, a date by which I can have that, so it's
 23 in advance of the next deposition?
 24 MR. CAVELLIER: Within 30 days in
 25 advance of that deposition.

1 MS. RONAYNE: It asks for bank
 2 statements, money market accounts, et cetera, and
 3 this one document that you provided to me, what you
 4 referred to I think as the internal summary, just
 5 shows that Deborah Frazier gave 1.149 -- 1,149,770,
 6 but there were no bank statements that show into what
 7 account this went or where those funds were
 8 deposited, and we had asked for --
 9 MR. CAVELLIER: There are no specific
 10 bank statements that would indicate that that was a
 11 deposit coming from Deborah Frazier. Any deposit
 12 would be -- would be an all-encompassing deposit. So
 13 if there were five checks received on any give date -
 14 -
 15 MS. RONAYNE: You -- but you obviously
 16 can tell me which bank statement includes her, so --
 17 MR. CAVELLIER: You -- your witness is
 18 here to --
 19 MS. RONAYNE: Pardon me?
 20 MR. CAVELLIER: -- to testify.
 21 MS. RONAYNE: Well --
 22 MR. CAVELLIER: Your witness is here
 23 to testify.
 24 MS. RONAYNE: Right. I'm asking about
 25 the subpoenaed information. That -- I'm not asking

1 him questions. And also some of them were wire
 2 transfers, so they would go directly into some bank
 3 account and were -- you've asked for the bank
 4 statements that reference these funds that were
 5 transferred.
 6 MR. CAVELLIER: It's my understanding
 7 from pastor's assistant that there's no bank
 8 statement that would identify specifically that the
 9 deposit was a deposit from Deborah Frazier.
 10 MS. RONAYNE: I -- I believe that his
 11 own documents will show wire transfers. Wire
 12 transfers --
 13 MR. CAVELLIER: Why don't you proceed
 14 with question and answer --
 15 MS. RONAYNE: No, no --
 16 MR. CAVELLIER: -- if that's the case
 17 --
 18 MS. RONAYNE: No, that's -- no, that's
 19 -- that's not --
 20 MR. CAVELLIER: I'm not here to
 21 testify. If those documents are --
 22 MS. RONAYNE: Sir, are you giving me
 23 documents in satisfaction of the subpoena duces
 24 tecum?
 25 MR. CAVELLIER: I'm giving you

1 documents produced by JMMI in response to the
 2 subpoena duces tecum that are responsive to your
 3 requests. Any --
 4 MS. RONAYNE: So how is it that --
 5 that you've responded to this request if you provided
 6 me no bank statements, when we know that there are
 7 wire transfers?
 8 MR. CAVELLIER: Because no bank
 9 statement, I'm told by another representative of
 10 JMMI, would reflect that it's a direct deposit from
 11 Deborah Frazier.
 12 MS. RONAYNE: A wire deposit -- wire
 13 transfer, you -- you don't think a bank statement
 14 would show a direct wire transfer --
 15 MR. CAVELLIER: Okay. I'm not here to
 16 testify.
 17 MS. RONAYNE: -- from one person --
 18 MR. CAVELLIER: You can ask this
 19 witness questions. If you think there's more
 20 information available to -- available, then --
 21 MS. RONAYNE: All right. Well, let me
 22 ask it this way --
 23 MR. CAVELLIER: -- you and I can
 24 discuss it off the record.
 25 MS. RONAYNE: Let's ask it this way.

1 Do you agree to provide any bank statements that
 2 would reference --
 3 MR. CAVELLIER: Ask --
 4 MS. RONAYNE: Sir, I'm asking you.
 5 MR. CAVELLIER: No.
 6 MS. RONAYNE: No, no, no. I'm asking
 7 you --
 8 MR. CAVELLIER: I'm not answering
 9 questions. You ask the witness.
 10 MS. RONAYNE: Let me finish my
 11 question. Do you agree, pursuant to the subpoena, as
 12 his attorney, to provide me with bank statements that
 13 would show any and all wire transfers from Deborah
 14 Frazier to JMMI or David Taylor, The Apostle?
 15 MR. CAVELLIER: If they exist, yes.
 16 But I don't know that they exist.
 17 MS. RONAYNE: All right. I --
 18 understand. But bank statements regarding wire
 19 transfers. And I understand that a deposit would be
 20 generic and not list on the bank statement who was --
 21 who compiled those -- those -- that sum?
 22 MR. CAVELLIER: Counsel, we'll look
 23 into wire transfers. I didn't make that specific
 24 inquiry, because that --
 25 MS. RONAYNE: That's not what I'm

1 asking. I've moved on.
 2 MR. CAVELLIER: -- wasn't specifically
 3 asked for.
 4 MS. RONAYNE: I've moved on. I'm
 5 asking -- I want bank statements that show whenever
 6 Mrs. Frazier's check was deposited, even if it was
 7 among other checks, but if you can point to this bank
 8 statement and say Mrs. Frazier's money was deposited
 9 on this day with or without other people, I want
 10 those bank statements. Do you have any objection to
 11 that?
 12 MR. CAVELLIER: If they exist, I'll
 13 provide them.
 14 MS. RONAYNE: Well, you would
 15 acknowledge that if it was deposited, there would be
 16 some statement, right? There would be something that
 17 would show that.
 18 MR. CAVELLIER: Most likely.
 19 MS. RONAYNE: Okay. Okay. Number
 20 two, all records showing how Mrs. Deborah Frazier's
 21 donations to Joshua Media Ministries International,
 22 JMMI, and/or any of its affiliates were spent in
 23 2012, '13, and '14, including, but not limited to
 24 canceled checks, invoices, check registers, bank
 25 statements, et cetera. In compliance with that

1 request, what is it you say you're submitting?
 2 MR. CAVELLIER: I am not going to
 3 proceed this way. You have a deponent; you ask him
 4 questions. He's produced these document --
 5 MS. RONAYNE: Yet you --
 6 MR. CAVELLIER: -- he can answer --
 7 MS. RONAYNE: -- handed them to me.
 8 MR. CAVELLIER: He can ans --
 9 MS. RONAYNE: So I just want you to
 10 tell --
 11 MR. CAVELLIER: JMMI handed them to me
 12 and I handed them to you.
 13 MS. RONAYNE: You represent JMMI.
 14 MR. CAVELLIER: I --
 15 MS. RONAYNE: You are the attorney of
 16 record and I'm asking you in satisfaction of the
 17 subpoena what documents are you saying --
 18 MR. CAVELLIER: Okay.
 19 MS. RONAYNE: -- reference number two.
 20 MR. CAVELLIER: The -- the ledger.
 21 MS. RONAYNE: The ledger shows -- is
 22 this -- where is the ledger. You're saying that the
 23 ledger you gave me somehow shows how her donations
 24 were used; is that what you're saying? Because you
 25 said that was in compliance with number one --

1 MR. CAVELLIER: I'm not testifying to
 2 anything. You have a witness here who can testify
 3 what the ledger will reflect, whether it will reflect
 4 income and outgo.
 5 MS. RONAYNE: It's pretty standard
 6 procedure in the beginning of a deposition to go over
 7 what the documents in compliance with the subpoena
 8 duces tecum and to ask if you are submitting those in
 9 compliance with the various itemizations. That's all
 10 I'm asking. I'm not asking you to testify.
 11 MR. CAVELLIER: Yes.
 12 MS. RONAYNE: So you're saying that
 13 the ledger in and of itself will show how money was
 14 spent that Mrs. Frazier gave to Pastor Taylor?
 15 MR. CAVELLIER: Is that -- is that a
 16 yes, the ledger will reflect --
 17 THE WITNESS: No, because we get money
 18 from a lot of other sources, so her money wasn't
 19 necessarily used in that --
 20 MR. CAVELLIER: This is why you need
 21 to ask specific questions --
 22 MS. RONAYNE: Well --
 23 MR. CAVELLIER: -- of the deponent.
 24 MS. RONAYNE: All right. I will ask
 25 The Apostle about that, because the document that I

1 have shows it broken down to various ministries as to
 2 where it was going. So we've asked how it is and --
 3 and what shows the -- the funds were used pursuant to
 4 that designation, and I don't think the -- the ledger
 5 shows any of that. So I -- I don't think you have --
 6 you've given me anything in satisfaction of
 7 itemization number two.

8 Number three, any and all
 9 correspondence, communication to or from Joshua Media
 10 Ministries International, JMIMI, and/or David E.
 11 Taylor, with Mrs. Deborah Frazier in 2012, '13, and
 12 '14, including, but not limited to emails, letters,
 13 solicitation requests, et cetera. I didn't see
 14 anything that referenced that.

15 MR. CAVELLIER: I have none in my
 16 possession. You can ask the deponent.

17 MS. RONAYNE: So it's your position
 18 they don't exist?

19 MR. CAVELLIER: I don't have any in my
 20 possession. You can ask the deponent.

21 MS. RONAYNE: Board of directors'
 22 minutes for Joshua Media Ministries International,
 23 JMIMI, for '12, '13, and '14; that's item number four.

24 MR. CAVELLIER: Mm-hmm.

25 MS. RONAYNE: We didn't get anything

1 in that regarding.

2 MR. CAVELLIER: I don't have any in my
 3 possession; you can ask the deponent about the
 4 existence of those records.

5 MS. RONAYNE: Number five, application
 6 and any supporting documents for tax exempt status
 7 for Joshua Media Ministries, JMIMI.

8 MR. CAVELLIER: What you've been
 9 provided is an IRS letter with an EIN indicating its
 10 tax exempt status.

11 MS. RONAYNE: We -- we need his
 12 application. Application and any supporting
 13 documents.

14 MR. CAVELLIER: Okay. You have the
 15 supporting documents.

16 MS. RONAYNE: I don't have an
 17 application.

18 MR. CAVELLIER: I don't have the
 19 application either.

20 MS. RONAYNE: Does your client?
 21 MR. CAVELLIER: You have to ask him.
 22 MS. RONAYNE: You can ask your client;
 23 does he have it.
 24 MR. JENKINS: I'm just going to object
 25 to form.

1 MS. RONAYNE: Go ahead and object, but
 2 --

3 MR. JENKINS: Because the proper --
 4 MS. RONAYNE: -- does he have it?
 5 MR. JENKINS: -- under the court
 6 rules, the proper thing is to question the deponent.
 7 I've been (indiscernible) attorneys can cross-
 8 examine. So I want to place that objection on the
 9 record --

10 MS. RONAYNE: Well, that's great.
 11 MR. JENKINS: -- under the Michigan
 12 Court Rules, under the Michigan Rules of Evidence.
 13 MS. RONAYNE: I am asking what you're
 14 submitting in compliance with the subpoena. Are you
 15 saying you don't have --

16 MR. CAVELLIER: Ms. Ronayne, I have
 17 given you --

18 MS. RONAYNE: Do you not have --
 19 MR. CAVELLIER: -- a letter dated
 20 January -- I'll answer the question -- January 16,
 21 2013; that's what I have in my possession that is
 22 responsive to your request.

23 MS. RONAYNE: All right. You
 24 understand there's a -- there's a court order that
 25 said he had to comply with the balance of the

1 requests in here? Okay, and you don't have that?
 2 MR. CAVELLIER: You can -- you can ask
 3 the deponent if any of the additional records exist.
 4 MS. RONAYNE: Do you have the Articles
 5 of Incorporation?
 6 MR. CAVELLIER: You've been provided a
 7 copy of the bylaws and articles of Joshua Media
 8 Ministries International --
 9 MS. RONAYNE: We just have the bylaws,
 10 not the articles.
 11 MR. CAVELLIER: The bylaws and
 12 articles are one in the same.
 13 MS. RONAYNE: I don't --
 14 MR. CAVELLIER: You can question the
 15 deponent with regard to that document.
 16 MS. RONAYNE: Those -- this says
 17 bylaws of Joshua Media Ministries. It does not say -
 18 -
 19 MR. CAVELLIER: And then it goes on to
 20 say article one.
 21 MS. RONAYNE: That's -- that's not --
 22 that's not Articles of Incorporation.
 23 MR. CAVELLIER: You can question the
 24 deponent with regard to this document.
 25 MS. RONAYNE: Number seven, financial

1 statements, records of all income and expenses for
 2 JMMI Media Ministries for '12, '13, and '14.
 3 MR. FRAZIER: We got a financial
 4 statement for 2014 and 2012; nothing for 2013.
 5 MS. RONAYNE: We don't have 2013. Did
 6 -- is that something you have with you, or --
 7 MR. CAVELLIER: I don't have it with
 8 me. I've given you everything that I have --
 9 MS. RONAYNE: Well, no, I'm just
 10 saying -- you've given me a pack; do you have it and
 11 I didn't manage to get it?
 12 MR. CAVELLIER: No, I don't have it.
 13 MS. RONAYNE: So you don't have it? A
 14 list of all assets and liabilities of JMMI?
 15 MR. CAVELLIER: You have what I have.
 16 MS. RONAYNE: I -- I don't know that,
 17 and I'm trying to make sure that what you gave --
 18 what you think you gave me you actually did, so do
 19 you think you gave me something called list of assets
 20 and liabilities?
 21 MR. CAVELLIER: You have a balance
 22 sheet.
 23 MR. FRAZIER: Right. So we're lacking
 24 2013.
 25 MR. CAVELLIER: You have a balance

1 sheet, it's two pages.
 2 MS. RONAYNE: But not for '13, right?
 3 MR. CAVELLIER: As of November 11th,
 4 2014.
 5 MS. RONAYNE: But you don't --
 6 MR. CAVELLIER: That's the only
 7 balance sheet that we have.
 8 MS. RONAYNE: You don't have anything
 9 for 2013?
 10 MR. CAVELLIER: I don't have anything
 11 other than the balance --
 12 MS. RONAYNE: Okay.
 13 MR. CAVELLIER: -- sheet that I
 14 provided to you.
 15 MS. RONAYNE: All I'm trying to make
 16 sure --
 17 MR. CAVELLIER: Ms. Ronayne --
 18 MS. RONAYNE: No, no, no. Do not
 19 interrupt me, please. Do not interrupt me, please.
 20 All I am trying to make sure that is in this pack of
 21 information that you think you handed me, that I
 22 actually got what you think, because I -- I don't
 23 know, there's all these things, and if you perhaps
 24 have something that you didn't hand to me. There's a
 25 little mishmash on how this was happening. It was

1 being emailed from your office.
 2 MR. CAVELLIER: Can I answer?
 3 MS. RONAYNE: Sure. You don't have
 4 2013; that's what you're saying?
 5 MR. CAVELLIER: What I'm telling you
 6 is that I have one balance sheet as of November 11th,
 7 2014, and I've provided it to you. If you have
 8 questions further than that, you have a deponent
 9 here.
 10 MS. RONAYNE: Federal tax returns for
 11 JMMI Ministries for '12, '13 --
 12 MR. FRAZIER: We have unsigned copies.
 13 MR. JENKINS: I'm just going to place
 14 an objection as to your client speaking in the
 15 deposition. The court --
 16 MS. RONAYNE: He's speaking to me.
 17 MR. JENKINS: Well, the court rules --
 18 he's participating in the deposition on the record.
 19 The court rules do not allow part -- they allow
 20 parties to attend; they do not allow parties to speak
 21 during a deposition. If he wants to sit and watch,
 22 he can sit and watch --
 23 MS. RONAYNE: He can talk to his
 24 lawyer.
 25 MR. JENKINS: But it's not app -- it's

1 not appropriate for the client --
 2 MS. RONAYNE: He can speak to his
 3 lawyer --
 4 MR. JENKINS: -- to be talking.
 5 MS. RONAYNE: -- any time he wants,
 6 and that's what he's doing. He's not testifying;
 7 he's not sworn in. He's talking to me.
 8 MR. JENKINS: It's the lawyer's job to
 9 do the deposition, not the client's.
 10 MS. RONAYNE: He's not asking
 11 questions.
 12 Tax returns for '12 and '13 -- we have
 13 unsigned copies; do you have any problem with
 14 providing signed copies?
 15 MR. CAVELLIER: Do they exist?
 16 THE WITNESS: I'm not sure --
 17 MR. CAVELLIER: Why don't we ask the
 18 deponent? To the extent that they exist, I'll
 19 provide you a copy of the signed tax returns. These
 20 are the tax returns -- and you can ask the deponent
 21 these questions -- that were filed with the IRS.
 22 MS. RONAYNE: And federal income tax
 23 returns for '12 and '13 for David E. Taylor? Oh, we
 24 don't have his tax returns for '12 or '13 --
 25 MR. CAVELLIER: The deponent is here

1 to tell you of the existence of the preparation of
 2 his personal tax returns. You can ask the deponent
 3 that question.
 4 MS. RONAYNE: List any and all donors
 5 by name, address, and telephone number, who have
 6 contributed more than \$2,000.00 in '12, '13, and '14
 7 to Joshua Media Ministries International, JMML.
 8 MR. CAVELLIER: You have been provided
 9 the donor list.
 10 MR. FRAZIER: (Indiscernible)
 11 MS. RONAYNE: Your list is for 5,000
 12 and over, and the court order said it was --
 13 MR. CAVELLIER: The 990s include the
 14 5,000 and over.
 15 MS. RONAYNE: Right. But the order
 16 said I was allowed to look at those for less than
 17 \$5,000.00 also of the donor list.
 18 MR. CAVELLIER: Well, I'm looking at
 19 the donor list, and it's \$2,000.00 and over.
 20 MR. FRAZIER: (Indiscernible)
 21 MS. RONAYNE: They aren't noted by
 22 year; this --
 23 MR. CAVELLIER: So now you're
 24 objecting to the format of the document --
 25 MS. RONAYNE: I have no objected to

1 their account to another account, that there would be
 2 a bank statement that would reflect that for the
 3 receiving party?
 4 A Of course.
 5 Q Okay. And you -- can you produce, consistent with
 6 the subpoena, the bank statements that would show
 7 Deborah Frazier's wire transfers?
 8 A Yes, of course.
 9 MS. RONAYNE: And do you want to tell
 10 me -- is that still the 30-day --
 11 MR. CAVELLIER: Yeah, we'll produce
 12 them within 30 days prior to the January 9th date, if
 13 the documents exist.
 14 MS. RONAYNE: He's indicated they do.
 15 BY MS. RONAYNE:
 16 Q So you have bank statements that show wire transfers
 17 that they were given from Deborah Frazier's account?
 18 A Yes.
 19 Q Okay. And I understand that bank statements that may
 20 not show only Deborah Frazier's deposit being made,
 21 but you obviously have bank statements that show
 22 various deposits that were made that would include
 23 Deborah Frazier's?
 24 A Yeah -- well, yeah, if she wired it --
 25 Q I'm not talking about wired ones.

1 anything. I'm just saying do you have a document
 2 that says what year, because we asked the question in
 3 increments of years.
 4 MR. CAVELLIER: I provided what you
 5 asked for.
 6 MS. RONAYNE: And the W-2 for 2012 is
 7 missing. Do you believe you gave that to me, or is
 8 that accurate that I don't --
 9 MR. CAVELLIER: No, I only received
 10 the 2013.
 11 DAVID E. TAYLOR
 12 SWORN AS WITNESS, TESTIFIED AS FOLLOWS:
 13 DIRECT EXAMINATION
 14 BY MS. RONAYNE:
 15 Q Mr. Taylor, you heard us discuss the subpoena duces
 16 tecum and the items that were requested to be
 17 produced?
 18 A Just now? Yes.
 19 Q Okay. And you understand there's a court order that
 20 indicates that you have to produce these items?
 21 A Yes.
 22 Q Okay. For item number two, where we're asking for --
 23 I'm sorry, let's go back to item number one where
 24 we're asking for bank statements; would you agree
 25 that when somebody does a direct wire transfer from

1 A Okay, yeah. If she gave a check or --
 2 Q Cash.
 3 A -- cash, all of that's recorded, and it's all
 4 itemized, yes.
 5 Q All right.
 6 A Individually.
 7 Q So you -- you would be able to tell me in what
 8 deposits those checks went into?
 9 A Of course, yes.
 10 Q And you could provide me the bank statements?
 11 A Of course. If that's appropriate, yes.
 12 Q That's what's been requested --
 13 A Okay.
 14 Q -- and ordered.
 15 A That's fine, yeah.
 16 Q And all records showing how Mrs. Frazier's donations
 17 -- this is item number two -- how they were spent,
 18 including canceled checks, invoices, et cetera, when
 19 she makes donations, she has designated for what
 20 purpose; for example, Rosh Hashanah; what would Rosh
 21 Hashanah be?
 22 A It's -- it's a Jewish holiday that we as Christians
 23 observe, you know, on the Jewish calendar. It's a
 24 quite celebrated holiday in the Christian community.
 25 In -- in the -- some circles, large circles. But not

- 1 everyone does it.
- 2 Q So when Mrs. Frazier made donations that were
3 designated as Rosh Hashanah, my subpoena duces tecum
4 asks for canceled checks, invoice, check registers,
5 bank statement, et cetera, that would backup those
6 donations being spent for that purpose.
- 7 A Yeah, that Rosh Hashanah is not so much a statement
8 for the purpose of the money being used; it's a --
9 it's a holiday and it's designating when she paid an
10 offering, like everyone else.
- 11 Q So it didn't go for the purpose of Rosh Hashanah in
12 any way?
- 13 A Well, Rosh Hashanah is not -- it's a holiday; it's a
14 service called Rosh Hashanah --
- 15 Q Right.
- 16 A -- it's not -- you know, take up an offering for a
17 specific thing, then, you know, like if I say we want
18 to raise a offering for a 18-wheeler truck, and --
19 and I said we gonna use this money for that, then it
20 goes directly to that. This is a service, such like
21 a Sunday morning service or Easter service, and, you
22 know, purposeful, when the people give donations, you
23 don't say well it goes to the Easter egg, you know;
24 you understand what I'm saying? It's a -- the Rosh
25 Hashanah is the name of a Jewish holiday.

- 1 Q I'm -- I'm aware of that.
- 2 A Not -- okay, great.
- 3 Q How long do you think Rosh Hashanah lasts; how many
4 days?
- 5 A Ten days normally.
- 6 Q Now one of her donations is listed as a money order.
- 7 A Mm-hmm.
- 8 Q And would you have deposited that and then -- into
9 the general fund?
- 10 A Yeah, I'm sure it would go there.
- 11 Q All right. And you can produce a bank statement that
12 would correlate with that deposit?
- 13 A We have everything on record.
- 14 Q Okay. When she talks about a leadership conference
15 in Taylor --
- 16 A Mm-hmm.
- 17 Q -- what would that money be related to?
- 18 A You know, I -- I've had different services that I
19 held, and we have people who attend those services
20 and they give in those services. So when you see
21 leadership is designating the type of service we've
22 having, where -- does that make sense?
- 23 Q So you have a specific service called a leadership
24 conference?
- 25 A Yes, where I teach leaders.

- 1 Q And do people have to pay to go into that service?
- 2 A No, everything is free. They donate freely in the
3 offering.
- 4 Q Now, is there a reason you didn't bring the
5 documentation that backs this up? Because you say it
6 exists.
- 7 A Yeah, it's not a reason we didn't. I just think that
8 maybe my office didn't quite understand everything
9 that was asked for in detail like you're asking. But
10 it's no problem; we can provide that.
- 11 Q And you -- when you say your office --
- 12 A Yes.
- 13 Q -- where would that be?
- 14 A I have an office here in Taylor, Michigan.
- 15 Q And what -- what's that address?
- 16 A 2320 -- what is that -- Superior Road.
- 17 Q What's -- what are the numbers?
- 18 A I'm saying 20 -- I think 320 -- 20320 --
- 19 Q Wait a minute; say it again.
- 20 A -- Superior -- 20320.
- 21 Q Okay. Five digits?
- 22 A Yeah.
- 23 Q Okay. Superior?
- 24 A Road. Mm-hmm.
- 25 Q And that's Taylor?

- 1 A Michigan.
- 2 Q Is the -- this designated as an office on the outside
3 of the building?
- 4 A At -- I'm sorry; what are you saying?
- 5 Q When you look at this 20320 Superior Road in Taylor -
6 -
- 7 A Mm-hmm.
- 8 Q -- what does the outside of the building look like;
9 does it say JMMI, does it -- what does it say?
- 10 A Yeah. It says JMMI.
- 11 Q JMMI. And do you take up the entire building?
- 12 A For what now?
- 13 Q For JMMI, for your office?
- 14 A We don't have to use the entire building for our
15 office facilities; we just part of it.
- 16 Q What's the rest of the building used for?
- 17 A Having services.
- 18 Q Is this the church in Taylor that you go to?
- 19 A I don't understand what you're asking; could you
20 rephrase --
- 21 Q Isn't there a church that you give services out of in
22 Taylor?
- 23 A Oh, yeah, on Sunday. But, you know --
- 24 Q Is -- is that this same building?
- 25 A We -- you know, we let them use the building on

1 Sunday morning.

2 Q Okay. When you say we let them, who is we and who is

3 them?

4 A JMMI owns the building and there's a church called

5 Kingdom Family Church that, you know, they are just

6 getting started, so -- so they don't have a large

7 overhead or nothing like that; we allow them to use

8 the building on Sunday. Since I use the building

9 mostly for massive conferences and services, things

10 like that.

11 Q When did JMMI purchase this building?

12 A I think that was in -- maybe two years ago. Yeah,

13 over -- a little over two years ago.

14 Q So there's a mortgage?

15 A No, it's paid off.

16 Q So do these Kingdom -- I'm sorry, is it Kingdom

17 Family?

18 A KFC, Kingdom Family Church.

19 Q Do then -- do they pay rent?

20 A Not really, no.

21 MR. CAVELLIER: Let me place an

22 objection on the record. I've given a lot of

23 latitude so far in this very brief deposition. The

24 objection is to relevance. I don't know how this

25 possibly relates to --

1 MS. RONAYNE: Your objection is noted.

2 MR. CAVELLIER: -- the issues of

3 parenting time and/or spousal support. You can go

4 ahead and answer the question.

5 BY MS. RONAYNE:

6 Q So when you say your office, are you referring

7 exclusively to this 20320 Superior Road building?

8 A Yes.

9 Q You do not have an office in any other city or state?

10 A Yes, we do.

11 Q Okay. Do you want to tell me about those?

12 A We're getting those more established. One is Saint

13 Louis, another in Budapest, Hungary, Europe, Korea,

14 Arizona.

15 Q You have offices in those four places?

16 A Yes.

17 Q May I have the address of the Saint Louis office?

18 A We used to use a P.O. Box for that.

19 Q I want the -- the actual street address.

20 A Well, we are just getting these established there --

21 before we get a building, so I usually use my P.O.

22 Box as an address for that. So to say that we have

23 just offices in a public building, we -- I usually

24 use my Taylor residence for the professional address.

25 Q All right. So wait a second. The Taylor residence

1 for --

2 A Building, Taylor office facilities.

3 Q All right. You used it as a -- you referred to it as

4 a Taylor residence; do you own a home --

5 A No, I'm sorry; I mean Taylor building on Superior.

6 Q Okay.

7 A It's a -- it's in a corporate area, so it's an office

8 building. It's not a residence; I'm sorry.

9 Q Okay. But it's also used as a church by some people

10 at least?

11 A Yes. Yes, we -- we allow churches to use it.

12 Q Okay. So the offices -- are you saying there is no

13 physical place in Saint Louis that your ministry

14 operates out of?

15 A No, we -- I mean a building physically, I used to

16 have one, but not now. I moved all of my physical,

17 you know, I don't want to say residence, what -- what

18 word should I use? I used -- I moved all my physical

19 place here in Taylor.

20 Q So there's nothing in Saint Louis anymore?

21 A A P.O. Box.

22 Q Well, that does -- that -- that's not a -- a --

23 A Well, our --

24 Q -- destination.

25 A -- mail go there, that's huge, that's massive; you

1 know, it's --

2 Q So when you say that's huge and massive, you're

3 referring to the amount of mail you get there?

4 A Mail -- mail; I mean corresponding with people is

5 very important to us. So that's big to us.

6 Q But you don't have any place in Saint Louis that you

7 work out of or anybody else works out of?

8 A We may work out of our little home or -- or whatever

9 with a computer --

10 Q What do you mean your little home; what does that

11 mean?

12 A Well, I mean, you know, like if I have a staff person

13 -- until I -- we raise enough money to buy another

14 office facility in that area, then, you know, we do

15 it out of -- you know, my staff that is there, they

16 do it out of the place they -- they live, so --

17 Q They do it out of --

18 A -- that's why I say --

19 Q I'm sorry; I -- I didn't hear you. Do it out of the

20 place that --

21 A Yeah, they're little office that they have in their -

22 - the place they stay in at this time.

23 Q You mean somebody --

24 A So that's what I'm telling you --

25 Q -- could be working technically, in your opinion, out

1 of their home?

2 A Like you do out of yours, right?

3 Q No, no.

4 A I mean --

5 Q I have an office.

6 A Yeah, I know. But you have a computer at your home

7 and you have an office. I have an office too, it's

8 here. So I'm saying I travel, I'm mobile, I live in

9 Saint Louis, so the things that have to be done,

10 there's -- we -- we take laptops. I'm sure you got a

11 laptop, right? Yeah.

12 Q This isn't about me.

13 A Yeah. But I'm just trying to give you --

14 Q Well, I -- no, I'm trying to figure out --

15 A Yes.

16 Q -- what -- where was the building that you say you no

17 longer have; what was that address?

18 A That was in -- in Saint Louis on Patterson -- I can't

19 remember the address.

20 Q You don't know the address of the building that you

21 owned?

22 A It's been years ago.

23 Q You said it was just a couple years ago.

24 A No, no, I didn't say couple; I said years ago.

25 Q How many years ago did you cease owning this

1 building?

2 A I didn't own it. It was a rental property.

3 Q It was a rental property in Saint Louis?

4 A Yes, mm-hmm.

5 Q And what was the purpose of that property?

6 A Office facilities.

7 Q And how big was it?

8 MR. CAVELLIER: Objection to

9 relevance.

10 MS. RONAYNE: Okay.

11 MR. CAVELLIER: He can -- he can

12 answer the question, but I'm going to place a

13 standing objection on the record.

14 MS. RONAYNE: That's fine.

15 THE WITNESS: It was probably about

16 3,000 square feet just for office facilities.

17 BY MS. RONAYNE:

18 Q And you paid rent to some --

19 A Mm-hmm.

20 Q -- somebody? Who did you pay it to?

21 A I don't remember the guy's name who owned it.

22 Q Okay. But you don't have any physical facility that

23 you operate out of --

24 A I don't have a building --

25 Q -- in Saint Louis?

1 A -- there -- like I said, I moved my offices here.

2 Q No, I understand.

3 A Yeah.

4 Q But aside from an office, anything else, even not --

5 A That's what I'm saying --

6 Q No, let me just finish so I -- we're -- we're real

7 clear what I'm asking.

8 A Okay.

9 Q Anything even other than an office --

10 A I've shared with you that --

11 Q -- let me just -- let me finish --

12 A Okay.

13 Q -- so you can understand. I --

14 A Okay.

15 Q -- I'm not talking about people that work out of

16 their home.

17 A Yes.

18 Q I'm talking about any other building or facility that

19 you or your ministry works out of in Saint Louis?

20 A Yes. I have staff who work out of a home that --

21 Q No, I understand that.

22 A -- they -- they live --

23 Q I'm asking about something else.

24 A I'm just saying I don't have what you're asking; I

25 don't have a physical building there like that. It's

1 up here in Taylor. This is where our professional

2 offices are.

3 Q Where is the residential center that is on your asset

4 and liability sheet?

5 A Oh, it's in Saint Louis.

6 Q Okay.

7 A But that's not an office.

8 Q I'm not -- I --

9 A Yeah.

10 Q -- I asked a few times -- it doesn't have to be an

11 office; any facility, building, structure that you

12 work out of, office or otherwise.

13 A Okay.

14 Q So there is a residential center --

15 A Oh yes, mm-hmm. You should have said that earlier.

16 Q Well, no, you should have answered earlier.

17 A No, you didn't --

18 Q Residential center --

19 A You didn't explain enough.

20 Q Residential center is in Saint Louis?

21 A Be direct and specific so I can --

22 Q So that's why I was suggesting you not interrupt me,

23 so that I can finish the sentence and you'll be real

24 clear what we were asking.

25 A Okay.

1 Q So a residential center does exist in Saint Louis?
 2 A Oh, of course, yes.
 3 Q Okay.
 4 A But that's -- you know, that's not an office.
 5 Q It doesn't have to be an office.
 6 A Okay.
 7 Q Any --
 8 A I thought you was talking about a -- a professional
 9 location like this.
 10 Q No, I --
 11 A We have that in Taylor, okay?
 12 Q I did not limit my question to an office.
 13 A Okay. So yeah, be more specific so I can know that
 14 you're saying.
 15 Q I -- I believe I was. All right.
 16 A Not really.
 17 Q So what is this residential center?
 18 A Oh, this is a -- a place that the ministry owns --
 19 well, not own, we are -- we are in the process of
 20 buying that. Yeah, we don't own it yet.
 21 Q So are you renting to buy or are you --
 22 A Yeah, we are leasing to buy.
 23 Q You have that as an asset of 2.844 -- 2,844,500. So
 24 do you own it?
 25 A I just answered that, didn't I? I said we didn't own

1 A That's the app -- that's I guess the appraisal value
 2 of the home or the residential center.
 3 Q Is it a home?
 4 A No, it's a residential center; we use it --
 5 Q All right. So you're saying it's not something you
 6 own, but you have it listed as an asset of \$2.8?
 7 A That's probably a mistake. Like I say, it probably
 8 should be a liability. Yeah, that should be a
 9 liability. I think that was an error there.
 10 Q Who -- who prepares this?
 11 A Um --
 12 Q This document called balance sheet?
 13 A I don't know. I don't know which one of them -- I
 14 have three people in the office that could do this,
 15 so I don't know which one.
 16 Q Who would those three people be?
 17 A Michelle, Ashley --
 18 Q All right. What's -- Michelle, is it just M-i-c-h-e-
 19 l-l-e?
 20 A Probably, yes.
 21 Q And her last name?
 22 A B-r-a-n-n-o-n.
 23 Q B-r-a-n-n-o-n?
 24 A Yes.
 25 Q Okay. And the next person?

1 it.
 2 Q Okay. But where --
 3 A We had to lease it to buy it.
 4 Q -- where does the -- I'm sorry?
 5 A We're leasing to buy it. Did -- did you -- I thought
 6 we just said that.
 7 Q All right.
 8 A Yeah.
 9 Q But you have listed it as an asset worth
 10 \$2,844,000.00 --
 11 A Oh, oh, oh. That should be more of a liability --
 12 MR. CAVELLIER: Would you like to take
 13 a look at that?
 14 THE WITNESS: Oh, okay.
 15 MR. CAVELLIER: And then you've got
 16 the liability on page two.
 17 THE WITNESS: Oh, okay. I see what
 18 you're saying. What we have already paid compared to
 19 what it's worth, is -- is that what you're saying?
 20 What are --
 21 BY MS. RONAYNE:
 22 Q You have listed it --
 23 A Because we -- it's not paid off like --
 24 Q All right. So where does the number 2,844,000 come
 25 from on the asset and liability --

1 A Ashley Ware.
 2 Q How do you spell Ashley?
 3 A A -- A-s-h-l-e-y.
 4 Q And how do you spell Ware?
 5 A W-a-r-e.
 6 Q And the next one?
 7 A Bashera (ph), and I really don't know how to spell
 8 that one. Bashera --
 9 Q Is it a man or woman?
 10 A It's a lady.
 11 Q Bashera?
 12 A Yeah.
 13 Q And her last name?
 14 A You know, I'm trying to pronounce that, Haque --
 15 Q Can you just spell it?
 16 A It's H-a-q-u-e, something like that. Yeah.
 17 Q Are -- are these all employees?
 18 A No, they are volunteer workers. One is an employee.
 19 Q Who is the employee?
 20 A Michelle.
 21 Q And these two people are volunteers?
 22 A Yes.
 23 Q Do you have an accountant that does any kind of
 24 accounting work for you?
 25 A We have a private firm, yes.

1 Q And who is that?
 2 A Davis and Associates.
 3 Q Davidson?
 4 A Davis and Associates.
 5 Q Davis and Associates?
 6 A Mm-hmm.
 7 Q And where are they located?
 8 A In Saint Louis.
 9 Q So you don't know who prepared this balance sheet?
 10 A Like I say, it could have been one of those three; I
 11 -- I -- I don't want to tell you a story, I can't
 12 tell you exact --
 13 Q I don't want you to tell me anything you can't --
 14 A Yeah.
 15 Q -- verify.
 16 A So I don't know.
 17 Q But your accountant did not?
 18 A Now what are you asking? Are you asking if the
 19 accountant did the -- the balances or did someone
 20 provide these sheets to you; what are you saying?
 21 What -- what -- what are you saying?
 22 Q In terms of who prepared this document about assets
 23 and liabilities, would your accountant have prepared
 24 this?
 25 A I don't think my accountant did that. I think that

1 A Timpaige; T-i-m --
 2 Q T-i-m --
 3 A -- p-a-i-g-e.
 4 Q That's the name of the -- the street?
 5 A Yes, Timpaige.
 6 Q Timpaige?
 7 A Timpaige, yep.
 8 Q Avenue, Road, anything?
 9 A I think it's Road, I believe.
 10 Q And that is in Saint Louis?
 11 A Yes, Chesterfield, Missouri.
 12 Q So you're renting with an option to buy?
 13 A Yes.
 14 Q And who is the owner then?
 15 A The ministry. Oh no, I'm sorry; the ministry is
 16 renting with an option to buy. The owner is Harold
 17 Lewis.
 18 Q Okay. And what goes on at the residential center?
 19 A Well, I mean it's --
 20 MR. CAVELLIER: Objection to the form
 21 of the question. What are -- what are you asking?
 22 BY MS. RONAYNE:
 23 Q What is its purpose, who goes there?
 24 A It is a -- really it's a gathering place for our
 25 ministry, where I bring in different leaders and also

1 the internal office tried to answer your questions
 2 and they pulled information from maybe documents that
 3 my professional firm did and tried to give you what
 4 you needed.
 5 Q So were -- were these documents created for the
 6 purpose of this deposition, or did they exist before?
 7 A Oh, they exist before. We have everything
 8 documented, everything. Every penny.
 9 Q But you acknowledge that you believe this 2.8 million
 10 is an error?
 11 A It has to be, because the residential center is not
 12 paid off. So it couldn't be an asset, right, it's a
 13 liability? That's how the banks would show it,
 14 right? You would know that, right?
 15 Q I -- I don't -- I don't answer questions. This is a
 16 one-way --
 17 A Okay. I'm just saying -- I'm trying to get an
 18 understanding --
 19 Q All right. So tell me the residential center, did we
 20 get an address for that?
 21 MR. FRAZIER: No.
 22 BY MS. RONAYNE:
 23 Q I need an address for the residential center.
 24 A Yeah. 24000 Timpaige --
 25 Q What is it?

1 the staff that we have as a place of, you know, maybe
 2 resort and teaching --
 3 Q Resort?
 4 A Yeah; teaching -- a resort where we teach and train.
 5 Q What do you mean by the word resort; usually people
 6 think of that as --
 7 A Maybe I'm not saying it right. Let's strike that
 8 word. Maybe -- it's a place where they can come and
 9 be refreshed; like I don't know if you have ever been
 10 on Christian retreats or things like that, where
 11 people can go and hear the word of God and also relax
 12 and that kind of thing, so --
 13 Q But it's not a church?
 14 A No, it's not a church.
 15 Q Do people live there?
 16 A It's habitable, yes. We -- we could live there, we
 17 could stay overnight.
 18 Q Do -- do people stay overnight and live there?
 19 A No, people stay overnight when I have guests in, they
 20 could come in and do that. But I have my own
 21 apartment. I stay in a small apartment.
 22 Q In the residential center?
 23 A No, no, I have my own personal apartment.
 24 Q Okay. We'll get to that. But I'm --
 25 A So what I'm saying -- so the residential center is

1 used -- it has bedrooms and stuff like that, so you
 2 can stay in there. But it's more so used for retreat
 3 or -- and a place where, you know, you can be
 4 refreshed. Am I answering right?
 5 Q Are you -- you're confident of that address that you
 6 gave me on Timpaige?
 7 A Yeah, 24000; is that right?
 8 Q You tell me?
 9 A I thought --
 10 Q You're confident of that address though?
 11 A I think so. I think that's right. Am I wrong? Do -
 12 - do I need to look something up? You know, what's -
 13 -
 14 MR. CAVELLIER: You're answering the
 15 question to the best of your knowledge.
 16 THE WITNESS: Yes; thank you.
 17 BY MS. RONAYNE:
 18 Q Is it possible that it's 15400 --
 19 A Oh, yes, that's right. 15400, that is right. That's
 20 totally off.
 21 Q I'm going to show you a picture of 15400 Timpaige.
 22 A Mm-hmm.
 23 Q This is in a residential neighborhood?
 24 A Yes, mm-hmm.
 25 Q And it is a home?

1 A Yeah, but it's a residential center. We -- that's
 2 what the ministry --
 3 Q Right. But this is in a residential neighborhood --
 4 A Oh, yeah.
 5 Q -- is that right?
 6 A Yes, of course.
 7 Q Okay. Is it like a subdivision with different houses
 8 up and down the street?
 9 A I don't think I would call it a subdivision, but it's
 10 other homes around it.
 11 Q So it is -- does --
 12 A It's a residential area, yeah.
 13 Q Do the neighbors there know you're operating a
 14 ministry out of there?
 15 A Mm-hmm.
 16 Q You have to answer yes or no.
 17 A Yes.
 18 Q And the -- this is actually not listed as Saint
 19 Louis, it's listed as -- listed as Chesterfield?
 20 A Yeah, I said that earlier.
 21 Q No, you said --
 22 A I said Chesterfield, Missouri.
 23 Q No, you said --
 24 MR. CAVELLIER: You're being
 25 argumentative.

1 THE WITNESS: Yeah.
 2 MR. CAVELLIER: Objection. He did say
 3 Chesterfield. I have it written down.
 4 MS. RONAYNE: Oh, I didn't hear it.
 5 THE WITNESS: You're not listening.
 6 MS. RONAYNE: I'm sorry, but I am,
 7 very carefully.
 8 THE WITNESS: Not really.
 9 MS. RONAYNE: Okay.
 10 BY MS. RONAYNE:
 11 Q So this -- the residential center is in Chesterfield,
 12 Missouri?
 13 A Chesterfield, yes.
 14 Q And it's actually what was -- had been used as a home
 15 by people previously, it's -- it's not an office
 16 building or --
 17 A Oh, no.
 18 Q Okay.
 19 A It's not a -- it's not in a business center area.
 20 Q Okay.
 21 A So it's in a residential area, but it's remote, it is
 22 not like upon -- you know, it's -- it's spacious, so
 23 you can -- you can understand what I'm saying --
 24 Q Well, it says it's 8,204 square feet.
 25 A Yes.

1 Q Okay. And you told me the owner was?
 2 A Harold Lewis.
 3 Q Harold Lewis?
 4 A Yes.
 5 Q And -- and who is Harold Lewis?
 6 A He's a sports agent for many years.
 7 Q Does he reside in that house?
 8 A No.
 9 Q And do you know where he lives?
 10 A Yes, but I can't give his address; I don't know that
 11 information.
 12 Q What city or what state?
 13 A Oh, Lake Saint Louis.
 14 Q Lake Saint Louis?
 15 A Yes, Lake Saint Louis. That's another suburb out by
 16 Chesterfield.
 17 Q So it's it Lake or Saint Louis?
 18 A Maybe -- what did I say?
 19 Q You said Lake Saint Louis, which I didn't think make
 20 sense.
 21 A Yeah, I -- I'm probably quoting that wrong. I'm --
 22 it's an area, it's like a suburb, and that's Lake --
 23 I think it's Lake Saint Louis. Lake -- I'm -- I'm
 24 not sure; I'm not positive. But I know it has Lake
 25 something in it.

1 Q So you're purchasing this home from Harold Lewis?
 2 A Yes. The ministry is. Not I. The ministry.
 3 Q And when you say it's remote, how do people get there
 4 then?
 5 A I mean, you know, it's not just -- it's a gate --
 6 Q Gated community?
 7 A Yes. Not community; the house is gated.
 8 Q How many nights a year would you say that you sleep
 9 there?
 10 A Oh, I don't know, because I'm always traveling on the
 11 road.
 12 Q You can approximate.
 13 A I'm in -- I'm in -- usually when I have guests or --
 14 I don't know, I really don't have -- what are you
 15 looking for; how many -- I don't have --
 16 Q How many nights would you spend --
 17 A It just --
 18 Q -- at that residential center?
 19 A -- it varies, it depends on if I'm traveling or --
 20 you know --
 21 Q You can approximate.
 22 A -- usually I'm out of town so much --
 23 Q Right. I understand.
 24 A Yeah.
 25 Q But still, how many nights would you spend there?

1 Q Just an approximation?
 2 A I can't say.
 3 Q Well, how often do you go to the apartment?
 4 A I'm -- I'm out of town so much, but I'm trying to
 5 think; what are you looking for --
 6 Q In the last three months, how many times have you
 7 gone to the apartment?
 8 A Okay. Now you're making sense. Okay. So we
 9 probably could say -- nailing it down like that --
 10 maybe ten.
 11 Q And in the last three months, how many nights or
 12 times would there be at the residential center?
 13 A Maybe five.
 14 Q So even though it's called a residential center --
 15 A Mm-hmm.
 16 Q -- you don't have people staying there continuously?
 17 A No.
 18 Q There is nobody that resides there --
 19 A No.
 20 Q -- as their primary residence?
 21 A No.
 22 Q And -- and what do you pay in rent on the apartment?
 23 A 900 and something. I'm not sure. It's about nine.
 24 Q And does anybody else live with you there?
 25 A No. Well, my babies; my two children.

1 A If I'm there for a week, I may spend two nights, and
 2 just check on things, but --
 3 Q What do you mean just check --
 4 A -- I can't really say --
 5 Q -- on things?
 6 A Well, I mean it's a -- it's a residence; you know,
 7 something you much check on, keep up.
 8 Q Now you said you have an apartment?
 9 A Yes.
 10 Q And what's that address?
 11 A 2008 Victory Way Lane.
 12 Q 2-0 --
 13 A 2008 -- 2008 Victory Way Lane.
 14 Q Victory --
 15 A Way Lane.
 16 Q In what city?
 17 A Florissant, Missouri.
 18 Q Can you spell that?
 19 A Florissant; F-l-o-r-i-s-s-a-n-t.
 20 Q How far is that from Chesterfield?
 21 A Probably 35 minutes.
 22 Q Okay. And then -- all right. So how many nights a
 23 year do you sleep at the apartment?
 24 A I can't say. I just know -- I don't know how to
 25 answer that. I really don't know how to answer that.

1 Q Your babies live there?
 2 A Well they -- yeah, they -- Joshua and Destiny.
 3 Q Joshua -- what's Joshua's full name?
 4 MR. CAVELLIER: Objection to
 5 relevance.
 6 MS. RONAYNE: That's okay.
 7 BY MS. RONAYNE:
 8 Q What's his name?
 9 A Joshua --
 10 THE WITNESS: Do I need to answer
 11 that?
 12 MR. CAVELLIER: Yeah, you can go ahead
 13 and answer, but it -- with the understanding that
 14 this is --
 15 MS. RONAYNE: I understand.
 16 MR. CAVELLIER: -- an ongoing
 17 objection.
 18 MS. RONAYNE: I get it.
 19 MR. CAVELLIER: Okay.
 20 BY MS. RONAYNE:
 21 Q Joshua?
 22 A Caleb Taylor.
 23 Q How do you spell Caleb; C --
 24 A C-a-l-e-b.
 25 Q And how old -- what's his date of birth?

- 1 A He's 15 years old.
 2 Q What's that date of birth?
 3 A December the 21st, 1999.
 4 Q 1999 did you say?
 5 A Yeah.
 6 Q And your other child?
 7 A Destiny Taylor.
 8 Q How do you spell that?
 9 A D-e-s-t-i-n-y.
 10 Q And her middle name?
 11 A Ann, A-n-n.
 12 Q And date -- date of birth?
 13 A January 16th, 1997. She's 17.
 14 Q Okay. When -- so you referred to them as your
 15 babies; they're actually teenagers?
 16 A I know. You are always children to your father;
 17 they'll always be my --
 18 Q Do you have any other children?
 19 A Yes. Isaiah Webster.
 20 Q How do you spell that?
 21 A I-s-a -- I-s-a-i-a-h.
 22 Q Middle name?
 23 A I don't have that -- Webster.
 24 Q You don't know his middle name?
 25 A No, I don't think he has one; W-e-b-s-t-e-r.

- 1 Q And his date of birth?
 2 A His date of birth is February 3rd, 19 -- no, sorry --
 3 I'm sorry, 2003.
 4 Q Any other children?
 5 A That's it.
 6 Q Three? All right. When you refer to Joshua and
 7 Destiny, you say they live at your apartment?
 8 A Mm-hmm.
 9 Q You got to answer yes or no.
 10 A Oh, yes.
 11 Q Is that full-time?
 12 A No, it's joint custody with their mom.
 13 Q And who is their mother?
 14 A Tabitha A. Taylor.
 15 Q And where does she live?
 16 A In Saint Louis.
 17 Q So if you're traveling so much and you only get to
 18 these places, you know, whenever, ten times in three
 19 months, is that the primary place that you see Joshua
 20 and Destiny?
 21 A No.
 22 Q Where else would you see them?
 23 A I have an apartment.
 24 Q No, I'm talking about the apartment.
 25 A Mm-hmm.

- 1 Q Is -- is that where you see them?
 2 A Wait, you asked about how often I go to residential
 3 center; you didn't ask about the apartment.
 4 Q No, I asked about both --
 5 A So that's really --
 6 Q I asked about both.
 7 A Well, no, you weren't specific about the apartment
 8 directly. The time we have there. You -- your --
 9 your question was about the residential --
 10 Q I asked both and you said in about three months you
 11 would probably go there about ten times and you pay
 12 \$900.00 a month in rent.
 13 A Oh, I'm sorry. I'm -- I'm -- I'm -- I -- I thought
 14 you was asking about the residential center. No, no.
 15 When I'm in town -- it's more than that there at the
 16 apartment where I pay \$900.00.
 17 Q You --
 18 A I thought you was speaking of the residential center;
 19 I'm sorry.
 20 Q Okay. So at the apartment --
 21 A Mm-hmm.
 22 Q -- in a three month period of time, how often do you
 23 think you stay there?
 24 A I try to make it back every weekend. So in -- in
 25 three months you were saying, out of -- out of 12

- 1 weeks you were saying -- maybe 12 -- no maybe -- so
 2 11 at the most, and nine at the least, if I'm really
 3 busy.
 4 Q All right. So when you said ten times in three
 5 months, that's kind of accurate then, isn't it?
 6 A Yeah, but I -- I thought I was referring to -- that
 7 was really another amount for the residential center
 8 to check on things.
 9 Q All right. So the residential center you also spend
 10 approximately ten nights in a three-month period of
 11 time?
 12 A Not really, no. I -- I was referring to maybe going
 13 there; that's what I thought you were referring to.
 14 Q Not sleeping there?
 15 A No. But I do have -- I have slept there --
 16 Q Are -- are you the caretaker of the residential
 17 center?
 18 A Well, I'm the caretaker, but I have help; my staff
 19 helps. So I -- I usually will have them go out there
 20 and take care of things when I'm gone.
 21 Q When you --
 22 A So --
 23 Q -- refer --
 24 A -- I don't know if I can say I'm the caretaker,
 25 because I'm always gone. So I have a staff that

1 really see to it --
 2 Q Who is the staff that you refer to in doing that?
 3 A It's a -- it's a -- it's a list of people.
 4 Q Where's the key to the place though?
 5 A With the caregiver; the person we have look at the
 6 place.
 7 Q All right. Who is that person?
 8 A James Gregory.
 9 Q And he is on staff?
 10 A Yes.
 11 Q With JMMI?
 12 A Mm-hmm.
 13 Q You have to answer yes or no.
 14 A Yes. I'm sorry. Yeah.
 15 Q And is he volunteer or paid?
 16 A Volunteer at this time.
 17 Q And he -- he has the key in his possession?
 18 A Yes.
 19 Q Who is the mother of Isaiah Webster?
 20 A Monica Webster.
 21 Q Where does she live?
 22 A In Washington state.
 23 Q What city?
 24 A I'm not sure now. West Tacoma.
 25 Q West Tacoma?

1 A Oh yeah, child support.
 2 Q Do you pay child support?
 3 A Mm-hmm.
 4 Q You have to answer -- I'm sorry --
 5 A Yes.
 6 Q -- yes or no.
 7 A Yes.
 8 Q And how much do you pay in child support?
 9 A 450.
 10 Q 450 --
 11 A A month, yes.
 12 Q -- a month?
 13 A Mm-hmm.
 14 Q And what about the two other children?
 15 A 750.
 16 Q 750 a month for Joshua and Destiny?
 17 A Yes.
 18 Q And were you married to their mother?
 19 A Yes.
 20 Q I'm sorry; and her name was Tabitha?
 21 A Yes.
 22 Q And when were you divorced?
 23 A In February of '10.
 24 Q And in what county and state?
 25 A Saint Louis.

1 A Yes.
 2 Q Were you married to Ms. Webster?
 3 A No.
 4 Q Do you have any kind of custodial relationship with
 5 Isaiah?
 6 A Yes.
 7 Q And what is that?
 8 A Just, you know, I'm his father, and I have the rights
 9 to see him and have him, so --
 10 Q Okay. But what I mean by custodial relationship --
 11 A Okay.
 12 Q -- do you have any kind of joint legal, joint
 13 physical --
 14 A Oh, no. Oh, no, no.
 15 Q Nothing on paper?
 16 A No.
 17 Q You got to answer --
 18 A No.
 19 Q Okay. So when is the last time you saw him?
 20 A It's been a while now.
 21 Q What would that be, just approximate?
 22 A Maybe a year.
 23 Q Are there court proceedings related to this child?
 24 A Um --
 25 Q Paternity, child support.

1 MR. CAVELLIER: I'll place a standing
 2 objection on the record.
 3 MS. RONAYNE: And I would just note
 4 that you're having a conversation with the deponent,
 5 just for the record.
 6 MR. CAVELLIER: I'm indicating that
 7 you're to answer the questions.
 8 BY MS. RONAYNE:
 9 Q So when someone says to you where is your residence,
 10 is -- well, tell me what your answer is.
 11 A I let them know where I live.
 12 Q And where would say that is?
 13 A My apartment 2008 Victory Way Lane.
 14 Q Okay. So that -- that would be where you actually
 15 reside?
 16 A Mm-hmm.
 17 Q I'm sorry; reside?
 18 A Mm-hmm.
 19 Q Do you have a driver's license?
 20 A Yes.
 21 Q And what address is on that?
 22 A 2008 Victory Way Lane.
 23 Q And when you refer to your babies, your two
 24 teenagers, do they live primarily with their mother
 25 since you're traveling so much?

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- 1 A Well, she has them -- if I don't, you know, come back
2 like in one week or so, of course they're with her.
3 But we have joint custody, so she has them half of
4 the week, I have them the other half.
- 5 Q Except you say you travel so much that you're not
6 really around?
- 7 A But I did tell you I try to come back like on the
8 weekends --
- 9 Q So you see your children every weekend?
- 10 A Mostly.
- 11 Q And that would be in the apartment?
- 12 A Yes, or wherever we go. They have come out to the
13 residential center too, so --
- 14 Q To sleep overnight?
- 15 A Yeah, they have done that before.
- 16 Q Now, is Debbie Frazier ever been to the residential
17 center?
- 18 A Yes, she has.
- 19 Q And when was that?
- 20 A When was the last time? I think the 4th of July was
21 -- no, I'm trying to remember if the 4th of July was
22 the accurate time, because we have the staff out, so
23 I think she was there.
- 24 Q And would she have swam in the pool there? Pardon
25 me?

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- 1 A I'm not sure.
- 2 Q Are there dogs there?
- 3 A Dogs?
- 4 Q Yeah, are there ever dogs that are at the residential
5 center?
- 6 A No.
- 7 Q So when Debbie Frazier goes to Saint Louis, do you
8 know where she goes or stays when she's there?
- 9 A No, I don't -- I don't know that information. I -- I
10 know she -- when she has come -- people from our
11 staff when we do crusades, they stay in a hotel.
- 12 Q What do you mean when you do crusades?
- 13 A Well, I do crusades all over the country, so if I
14 carry our team to Saint Louis, of course we've done
15 that where we have a bigger crusade, and the team
16 from Taylor, Arizona, and other places come in and
17 they get hotels.
- 18 Q How many times do you have crusades in Saint Louis?
- 19 A Well, now with my schedule, it's -- it's only once a
20 year now, because I can't hold them four times a year
21 like I used to.
- 22 Q What is Deborah Frazier's -- Frazier's relationship
23 to JMMI?
- 24 A She is a first of all a wonderful mother and --
- 25 Q No, I'm asking about JMMI; not --

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- 1 A Yeah, that's what I'm saying; I'm getting there.
2 Just hold your horses. So -- and she really is a
3 worker, a very diligent worker in the ministry.
- 4 Q What does that mean?
- 5 A Well, she helps service people, help people --
- 6 Q What does that -- tell me what that means.
- 7 A Helps feed the poor.
- 8 Q Tell me what that means; where do they feed the poor?
- 9 A Well, you know, before, of course that -- the food
10 bank moved out, she was also helping in that with our
11 ministry --
- 12 Q Okay. I don't know anything about --
- 13 A A food bank; you don't understand that?
- 14 Q No, you said before it moved out. I don't know
15 anything about a food bank moving out.
- 16 A Oh, yeah, yeah. Yeah. Well -- well --
- 17 Q Out of where?
- 18 A Out of our building. They had -- they wanted to get
19 a bigger place. So -- but for about --
- 20 Q All right.
- 21 A -- what, six years, we housed the -- a -- a food
22 bank.
- 23 Q Hold on a sec.
- 24 A Okay.
- 25 Q Food bank moved out of your building. What building

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- 1 are you talking about?
- 2 A Oh, Taylor.
- 3 Q Taylor.
- 4 A In Taylor, yes.
- 5 Q So there was a food bank --
- 6 A Yes.
- 7 Q -- in what building?
- 8 A In the Taylor building at -- on Superior Road. But
9 it's no longer there, but those -- you know, those
10 are the kind of services she would do, where she
11 would help -- our ministry would join with them --
12 like I say, I let the building out to different
13 ministries to do different multiple things. So they
14 would --
- 15 Q For free?
- 16 A Yes, for free.
- 17 Q Okay. So there was a food bank and you're saying
18 that Deborah Frazier worked at the food bank?
- 19 A She helped some. She didn't just work all the time,
20 but that's the kind of work that she would do.
- 21 Q When did the food bank leave?
- 22 A When was that? Earlier this year. They went to try
23 to get a bigger place, I guess.
- 24 Q What was it called, food bank?
- 25 A You know, that's the name they used. That's the name

- 1 they used, so I don't --
- 2 Q Did they have a sign that said food bank?
- 3 A Yeah, probably. Something like --
- 4 Q Do you -- well, I mean do you know or not know?
- 5 A I just don't -- I'm not really sure. All I know is
- 6 that's that the common word that they would use and -
- 7 - and they would bring Gleaner's in -- an 18-wheel
- 8 truck and just feed hundreds of families.
- 9 Q Do you know what agency was involved in this, who
- 10 organized the food bank?
- 11 A It -- it was the ministry that was connected with us,
- 12 so I -- I don't have all that information.
- 13 Q Well, when somebody comes to you and says can we use
- 14 part of your building --
- 15 A Yeah.
- 16 Q -- to feed the poor, do you ask who they are?
- 17 A Of course.
- 18 Q Okay. Who were these folks?
- 19 A They -- they were a ministry that came in -- you
- 20 know, they were more so feeding the poor --
- 21 Q By what name were they known?
- 22 A Oh, okay. See they -- you know, I don't know, they
- 23 didn't go by a name like that. I know they were
- 24 establishing in -- incorporated; I can just tell you
- 25 their names as individuals, but their organization --

- 1 A Mm-hmm.
- 2 Q What city?
- 3 A Florissant, Missouri.
- 4 Q Can you spell that again, F-l --
- 5 A F-l-o-r-i-s-s-a-n-t.
- 6 MR. FRAZIER: Bishop's name?
- 7 BY MS. RONAYNE:
- 8 Q What's the bishop's name?
- 9 A Bishop Matthew Ferguson.
- 10 Q And what's the name of the church?
- 11 A Abundant Life Church.
- 12 Q And do you have an address?
- 13 A I really don't know it.
- 14 Q So the crusade though is once -- only once a year,
- 15 isn't it?
- 16 A Yes.
- 17 Q Okay. But -- but Debbie Frazier goes to Saint Louis
- 18 and works for you much more frequently than once a
- 19 year.
- 20 A Of course, mm-hmm.
- 21 Q Okay. So she does a crusade once a year, and when
- 22 would that be?
- 23 A We usually do it right after the spring or --
- 24 Q After the spring?
- 25 A Yeah.

- 1 we were really covering them and supporting that --
- 2 Q What do you mean you were covering them?
- 3 A Well, you know, they needed a place to do that out of
- 4 and a place to bring the 18-wheeler to --
- 5 Q You said they were incorporated?
- 6 A Mm-hmm.
- 7 Q Yes?
- 8 A The name -- the name -- yes. Yes. But their name, I
- 9 don't know their name. I don't know their official
- 10 name. I just know it was a ministry team and they
- 11 were doing this work.
- 12 Q Okay. When Ms. Frazier goes to Saint Louis --
- 13 A Mm-hmm.
- 14 Q -- what does she do for you or the ministry or
- 15 whoever?
- 16 A Well, when she goes to Saint Louis, she works in the
- 17 crusades like if I'm having a service there, she
- 18 users --
- 19 Q Where -- where would this physically be?
- 20 A The crusade?
- 21 Q Right.
- 22 A At a -- a -- a friend of mine -- a bishop's church
- 23 who has a -- a large facility in this -- in the
- 24 suburb.
- 25 Q In the suburb?

- 1 Q Meaning in the summer?
- 2 A The crusade -- you're talking about the crusade in
- 3 Saint Louis, right?
- 4 Q Right.
- 5 A Okay, yeah. After the spring.
- 6 Q Would that mean summer?
- 7 A Yeah, you could probably say the beginning of summer.
- 8 Q You don't have it the same time every year?
- 9 A No, we can't. It's -- the -- the schedule is too
- 10 sporadic to do that.
- 11 Q Okay. And how long does it last?
- 12 A About three days.
- 13 Q And what exactly would Deborah Frazier do to assist
- 14 in the crusade?
- 15 A She users, she mostly in -- and any type of help that
- 16 is needed by anybody coming in, assist -- she assists
- 17 them.
- 18 Q All right. Give me an example of what that would
- 19 mean.
- 20 A Like if someone come in a wheelchair or something
- 21 like that, and she's helping them. She's a great
- 22 parent.
- 23 Q A great parent?
- 24 A Yeah, she's a great parent.
- 25 Q Okay.

1 A And a great --

2 Q What does that have to do with what she does in Saint

3 Louis?

4 A Oh, I -- I think -- I think her being a great parent

5 has a lot to do with her -- the way her character is

6 in the ministry too.

7 Q Do you realize she has only supervised visits with

8 her children?

9 A Oh, I know all of that, yes.

10 Q Okay. She talks to you about that?

11 A Um --

12 Q You don't know have to look at -- at your lawyer; I'm

13 asking you the question.

14 MR. CAVELLIER: Well, I'm going to

15 object based on privilege between the priest and

16 penitent.

17 MS. RONAYNE: Priest?

18 MR. CAVELLIER: He's got the

19 priest/penitent privilege. He doesn't have to answer

20 any questions specific to conversations with his

21 members.

22 MR. FRAZIER: (Indiscernible)

23 MS. RONAYNE: I -- I don't think he's

24 a priest --

25 MR. CAVELLIER: It's a priest/penitent

1 (WHEREUPON, a brief recess was taken

2 from 3:58 p.m. to 4:04 p.m.)

3 (WHEREUPON, Deposition Exhibit Number

4 One was marked at 4:04 p.m.)

5 VIDEOGRAPHER: Back on the record at

6 4:04, disk two.

7 BY MS. RONAYNE:

8 Q Mr. Taylor, I'm going to show you Exhibit One. I'm

9 going to ask you if this is what you have referred to

10 as the residential center?

11 MR. CAVELLIER: Can I see it before

12 you answer?

13 THE WITNESS: Yes, this is.

14 MS. RONAYNE: Okay.

15 BY MS. RONAYNE:

16 Q And can you tell me how many pages are on that

17 exhibit?

18 A Six.

19 Q And is it accurate that all of those pages are

20 pictures of the residential center?

21 A Yes.

22 Q Okay. And is that also referred to as the ministry

23 house?

24 A It could be, yeah. I mean yes.

25 Q Yes?

1 privilege --

2 MS. RONAYNE: I'm --

3 MR. CAVELLIER: He doesn't have to be

4 a priest. He can be a minister --

5 MS. RONAYNE: Do you have a cite for

6 that?

7 MR. CAVELLIER: No I don't.

8 MR. JENKINS: I'm just going to make -

9 - you know, again, there's a certain decorum in this

10 deposition. I'm going to raise an objection.

11 There's two things that are happening with your

12 client. One, he's glaring. Two, he's making

13 comments. It's inappropriate. That's

14 unprofessional. You're the attorney. If he wants to

15 participate, he shouldn't be glaring, shaking his

16 head, rolling his eyes, and making comments. He's

17 allowed to be here. He's not -- that's not

18 appropriate --

19 MR. CAVELLIER: And I concur in that

20 objection.

21 MS. RONAYNE: That's fine.

22 MR. CAVELLIER: Let's -- let's take a

23 five-minute break. I need to use your restroom.

24 MS. RONAYNE: Go ahead.

25 VIDEOGRAPHER: Off the record at 3:58.

1 A We usually say professionally residential center, so

2 --

3 Q But sometimes it's referred to as the ministry house?

4 A Yes, mm-hmm.

5 Q And is there any other place that's referred to as

6 the ministry house?

7 A I think the -- there's another location where the

8 ministry -- I think started buying a place and it's a

9 place for some of the staff -- you know, where I -- I

10 provide a place if someone wants to do intern in the

11 ministry, so I provide a place for them to stay.

12 Q Where is that?

13 A It's in Saint Louis.

14 Q And what's the address for that?

15 A You know, I don't know. I -- I don't have that,

16 because it's recent, so it's -- it's not --

17 Q Would you be able to provide that --

18 A Yeah, we can provide that for you.

19 Q -- with the other documents you're going to get to me

20 before your next deposition?

21 A Of course, yes. Exactly.

22 MS. RONAYNE: And just -- just for the

23 record, I would note over Mr. Jenkins' statements

24 that we dispute that my client is glaring or doing

25 anything inappropriate. He is looking at David

1 Taylor a/k/a The Prophet -- I'm sorry, The Apostle,
2 because that is the person who is speaking, and he is
3 not rolling his eyes; he is talking to me on occasion
4 which is perfectly acceptable for him to talk to his
5 attorney. And I would just like the record to
6 reflect that. So back to the questions --

7 MR. JENKINS: The record reflects that
8 he's been making statements regularly verbally while
9 he's been sitting there.

10 MS. RONAYNE: Right, to me.

11 MR. JENKINS: While you're -- while
12 you're talking.

13 MS. RONAYNE: I hear him.

14 MR. JENKINS: No, while you're
15 talking.

16 MS. RONAYNE: That's fine.

17 MR. JENKINS: And -- and -- and also -

18 -

19 MS. RONAYNE: He has another attorney
20 sitting next to him.

21 MR. JENKINS: -- that's fine.

22 MS. RONAYNE: Okay.

23 MR. JENKINS: I'm sitting right across
24 from him, so --

25 MS. RONAYNE: That's fine.

1 trained.

2 Q Has Deborah Frazier ever stayed there?

3 A She's come over there.

4 Q What do you mean she's come over there?

5 A She's visited and come over I'm sure --

6 Q But you don't know the address?

7 A No, it's too recent for me.

8 Q When you say it's recent, when did that start?

9 A Maybe a year, two, something like that. I just don't
10 know --

11 Q I'm going to show you what you provided as the
12 balance sheet and ask you to indicate where on this
13 this building is represented?

14 A What building?

15 Q Well, you just said what -- you were in the process
16 of buying a ministry house --

17 A Uh --

18 Q -- where would it show up on the asset and liability?

19 A Well, it wouldn't because we're leasing it right now,
20 so it's a liability. I don't know if they put it on
21 here --

22 Q Well, what do you mean you're in the process of
23 buying; does that mean that you --

24 A Well, yeah, we in stages until we can buy; that's
25 what I mean --

1 MR. JENKINS: I'm just asking --

2 MS. RONAYNE: I -- I've indicated that
3 I don't --

4 MR. JENKINS: My -- my request was to
5 control your client, so --

6 MS. RONAYNE: My request is that you
7 stop unnecessarily objecting. My client has done
8 nothing wrong. He has a lawyer sitting on each side
9 of him, and he on occasion speaks to me or to the
10 other attorney, and there's nothing wrong with it.

11 MR. JENKINS: My objections are noted.

12 MS. RONAYNE: All right.

13 BY MS. RONAYNE:

14 Q Mr. Taylor --

15 MR. JENKINS: And I can still maintain

16 --

17 BY MS. RONAYNE:

18 Q -- you don't know the address of the place that is
19 also sometimes called ministry house?

20 A No.

21 Q And tell me the purpose of this place?

22 A It's a -- it's a -- a residence that we bought that -
23 - or that we're in the process of buying to -- that
24 gives young aspiring preachers and ministers a place
25 to -- to stay while they intern in our ministry being

1 Q Okay. I'm not sure what that means.

2 A You know, before we just pay off something, we -- we
3 lease it until, you know, we have enough money to be
4 able to do that. Does that make sense to you?

5 Q Not much. So is it your testimony that you are
6 leasing this piece of property?

7 A Yes.

8 Q And how much do you pay a month?

9 A Actually, I -- I don't know. My -- my financial
10 board knows all of those things.

11 Q Who is your financial board?

12 A Those three that I gave you there.

13 Q They're your board?

14 A No, I said a financial board.

15 Q What --

16 A That means a certain area. They -- they handle a
17 certain area.

18 Q The financial board is the --

19 A Different from the board of the JMMI.

20 Q Okay. But when you refer to them as a board --

21 A Well, maybe I ought to rephrase that, since you are
22 tripping over that. Let's say they are financial
23 administrators, is that -- do that make sense?

24 Q You tell me if it makes sense.

25 A Yes.

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- 1 Q So do you see anything regarding this ministry house
2 on the asset and liability sheet?
- 3 A No, it -- I don't think it would be on here, because
4 it -- it might be -- I don't see it as -- as of now.
- 5 Q Can you describe this place?
- 6 A It's -- it's -- it's just a residential home.
- 7 Q It's another house?
- 8 A Yes, it's like a home, but it's --
- 9 Q What do you mean it's like a home?
- 10 A Oh, I mean it's a home.
- 11 Q It is a home?
- 12 A Yeah, mm-hmm.
- 13 Q Okay. Is it at 2036 Victory Way Lane?
- 14 A 2036? No, no, no.
- 15 Q What's at 23 -- 2036 Victory Lane?
- 16 A I don't know that's a -- it's an address --
- 17 Q It has nothing to do with your ministry at all?
- 18 A Mm-mmm.
- 19 Q You got to answer yes or no.
- 20 A No.
- 21 Q So it's -- you -- you don't have any connection to
22 2036 Victory Lane --
- 23 A No.
- 24 Q -- Way?
- 25 A My -- my -- you know, apartment is 208 -- I mean 2008

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- 1 Victory Way Lane.
- 2 Q Okay.
- 3 A So I -- that sounds like another address over in that
4 area, but that's not -- I have nothing to do with
5 that.
- 6 Q And that's not where the ministry house is?
- 7 A No. That's the -- those are condominiums, okay --
- 8 Q Victory Lane?
- 9 A Yes.
- 10 Q So this ministry house, you've been -- the ministry -
11 - JMMI has been leasing?
- 12 A Yes.
- 13 Q Okay. Now, are you the head of JMMI?
- 14 A Yes.
- 15 Q And -- and you don't know where this place is?
- 16 A I know where it is; I just don't know the address. I
17 don't want to give you any wrong details like I did
18 the first time. It's just --
- 19 Q All right. Can you tell me -- give me the
20 description of where it is?
- 21 A It's in Florissant, Missouri.
- 22 Q Right.
- 23 A I know that. Mm-hmm.
- 24 Q Cross-streets?
- 25 A Yeah, it's a neighborhood.

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- 1 Q What are the cross-streets?
- 2 A I don't know that. But I -- like I said, I'll
3 provide you with the information after this is over
4 with.
- 5 Q Who owns this residence?
- 6 A I don't know. It's -- it's a -- some -- I don't -- I
7 don't know.
- 8 Q Did you arrange for this lease?
- 9 A No.
- 10 Q Who -- who would have done that?
- 11 A I have a financial board who does those things.
- 12 Q Those three people you referred as Michelle and --
- 13 A Yes. Financial administrative people.
- 14 Q And so you're saying they -- but don't you have to
15 sign the lease?
- 16 A No, I'm not the only one that can sign. I have a
17 board -- board members who are --
- 18 Q So you didn't sign this lease?
- 19 A You know, I don't even know.
- 20 Q Can you give me a copy of the lease?
- 21 A Is that necessary?
- 22 MR. CAVELLIER: Yeah. I would object
23 to the relevance of providing documents to a lease --
- 24 THE WITNESS: Okay.
- 25 MR. CAVELLIER: -- that's the property

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- 1 of JMMI. That has nothing to do with your --
- 2 MS. RONAYNE: Actually, it does. We -
3 - we've been unable, despite a court order, to get an
4 address as to where the ministry is and what the
5 locations --
- 6 MR. CAVELLIER: You have been -- you
7 have been -- you have an address --
- 8 MS. RONAYNE: I have one address for
9 one thing --
- 10 MR. CAVELLIER: -- 24000 Timpaigne
11 Drive.
- 12 MS. RONAYNE: Right. But I --
13 nobody's giving me an address for what's referred to
14 as the ministry house where people who are
15 participating in the ministry go and live and are
16 provided a residence by Mr. Taylor.
- 17 THE WITNESS: Well, we said we'll
18 provide that. I just don't know it. So it's not a
19 problem --
- 20 BY MS. RONAYNE:
- 21 Q What's not a problem?
- 22 A So you shouldn't make a big deal -- I mean we're
23 going to give you the address.
- 24 Q Well, right. I'm asking for a copy of the lease --
- 25 A I just don't know it now. I don't -- I don't have

1 that information on me now.
 2 Q Okay.
 3 MR. FRAZIER: (Indiscernible)
 4 BY MS. RONAYNE:
 5 Q Have you ever been there?
 6 MR. JENKINS: I'm just going to let
 7 the record reflect another comment -- I mean an
 8 objection about your comment under oath he doesn't
 9 know the streets. That's commentary. That's not
 10 assisting you. I ask for that to stop.
 11 MR. YATOOMA: That -- that was made to
 12 me as --
 13 MS. RONAYNE: He spoke to her -- his
 14 attorney.
 15 MR. JENKINS: He made it -- he made it
 16 out loud.
 17 MS. RONAYNE: Well --
 18 MR. JENKINS: It's not appropriate.
 19 He wants to assist you in the deposition, that's
 20 fine. But the commentary is inappropriate. I've
 21 done depositions for years. I've never had --
 22 MS. RONAYNE: So have I.
 23 MR. JENKINS: -- somebody sit and --
 24 and start to make comments like this.
 25 MS. RONAYNE: He is my attor -- my --

1 MS. RONAYNE: Okay.
 2 MR. JENKINS: The comments are not
 3 facilitating questions of what you're talking about.
 4 They're commentary about the -- what the -- what the
 5 deponent is saying.
 6 MS. RONAYNE: That's fine.
 7 MR. JENKINS: That's not appropriate.
 8 MS. RONAYNE: In your opinion.
 9 There's no -- show me a court rule on that.
 10 MR. JENKINS: A party is --
 11 MS. RONAYNE: There's no court --
 12 MR. JENKINS: A party is not allowed
 13 to speak. He can attend. He's not allowed to speak
 14 at the deposition.
 15 MS. RONAYNE: I don't think --
 16 MR. YATOOMA: This is -- this is
 17 silly.
 18 MS. RONAYNE: It is.
 19 MR. YATOOMA: He's -- he's making a
 20 comment that the deponent doesn't know an address
 21 that he's owned for two years to his attorney.
 22 That's what he's saying to me.
 23 MR. JENKINS: The deposition is being
 24 conducted by the attorneys, not by the clients. Not
 25 by the clients.

1 my client, I am his attorney, and so is the -- the
 2 other person sitting on the other side, Mr. Yatooma -
 3 -
 4 MR. JENKINS: The personal commentary
 5 is inappropriate.
 6 MS. RONAYNE: Don't interrupt, please.
 7 MR. JENKINS: I -- no, I -- I'm
 8 talking and I'm making an objection --
 9 MS. RONAYNE: I was talking.
 10 MR. JENKINS: And I'm making an
 11 objection. It is just inappropriate.
 12 MS. RONAYNE: That's fine. We -- we -
 13 -
 14 MR. JENKINS: (Indiscernible)
 15 MS. RONAYNE: We dispute your
 16 characterization, and fortunately it's videotaped, so
 17 we shouldn't have a problem.
 18 MR. CAVELLIER: I concur that it's
 19 disruptive.
 20 MS. RONAYNE: That's fine. I would
 21 also note that the deponent is at the far end of the
 22 table from Mr. Yatooma who my client is speaking to,
 23 so I don't think it's disruptive.
 24 MR. CAVELLIER: I can hear the
 25 comments.

1 MR. YATOOMA: (Indiscernible) which I
 2 think only hurts the deponent, but again --
 3 MR. CAVELLIER: Do you have an
 4 objection?
 5 MR. YATOOMA: All this --
 6 MR. CAVELLIER: Do you have an
 7 objection?
 8 MR. YATOOMA: No, I'm responding --
 9 MR. CAVELLIER: Then state your
 10 objection if you have one.
 11 MR. YATOOMA: (Indiscernible)
 12 MR. CAVELLIER: I stated the
 13 objection. That's for the record.
 14 MR. YATOOMA: Okay.
 15 MS. RONAYNE: All right.
 16 BY MS. RONAYNE:
 17 Q So back to the ministry house. You don't know who
 18 you leased it from?
 19 A Like I say, I have a -- I have a --
 20 Q I'm just asking you; do you know who you leased it
 21 from?
 22 A Let me finish answering you. I -- I have a vast
 23 ministry, so I don't know everything always that goes
 24 on. I know overall that I have people who take care
 25 of those things. So, you know, I will get that for

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- 1 you, so that's no problem. If we can move on from
2 that question.
- 3 Q All right. So this ministry house, you're saying you
4 are providing residence for people that are in
5 training?
- 6 A Yes.
- 7 Q Okay.
- 8 A Aspiring ministers.
- 9 Q Is Deborah Frazier one of those people?
- 10 A No. She lives here, right?
- 11 Q Has she ever stayed there at the ministry house; has
12 she ever --
- 13 A She's come by there. People come by and see each
14 other and so she don't stay there, no.
- 15 Q She's never spent the night there?
- 16 A Not that I know of.
- 17 Q Has she ever done any ministry work there?
- 18 A I -- I'm not sure. I'm -- I couldn't say.
- 19 Q Who would know that?
- 20 A Maybe Michelle.
- 21 Q Is Michelle's primary location that she works in in
22 Taylor or in Saint Louis?
- 23 A Saint Louis.
- 24 Q Okay. So when she's in Saint Louis, what facility
25 does she work out of?

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- 1 A Actually, I would like to rephrase that. I think I
2 would say both, because she comes back and forth here
3 to do -- in the offices to do things, but her laptop
4 she uses at her own home.
- 5 Q Okay. And does she have a residence in Saint Louis?
- 6 A Yes.
- 7 Q Okay. Now, you're aware Debbie Frazier frequently
8 goes to Saint Louis --
- 9 A Yes.
- 10 Q -- several times a month?
- 11 A Yes.
- 12 Q Okay.
- 13 A I don't know if it's several times a month.
- 14 Q Several days a month.
- 15 A Okay.
- 16 Q That -- would that be more accurate for you?
- 17 A I'm not sure. I --
- 18 Q You don't know?
- 19 A -- don't know when she comes -- I know she comes to
20 Saint Louis.
- 21 Q How many times -- how many days a month would you
22 approximate that she goes there?
- 23 A I couldn't say.
- 24 Q You have no idea?
- 25 A I couldn't say accurately, no.

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- 1 Q Does she see you when she goes to Saint Louis?
- 2 A No.
- 3 Q She doesn't see you?
- 4 A No. If there's there, I may be out of town or if she
5 is there and we see each other, it's briefly, but --
6 but I don't -- I don't see her like that, no.
- 7 Q What is your understanding of the work that Deborah
8 Frazier does when she's in Saint Louis on your
9 behalf?
- 10 A Well, like I say, I have executives and
11 administrators administrating their work and doing
12 that, so I'm not -- my hands is not in everything, so
13 I -- I can't -- I can't say.
- 14 Q You have no idea what Deborah Frazier does when she's
15 in Saint Louis?
- 16 A I -- I know she's a great worker and she really --
- 17 Q But doing what?
- 18 A I share with you what I do know, and like I said to
19 you, if you want to know more, you'll have to ask my
20 executives.
- 21 Q And who would that be?
- 22 A Michelle is one.
- 23 Q Michelle is an executive and also the financial
24 board?
- 25 A No, she's not the financial board. She sits -- she

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- 1 administrates with other financial people. So it's
2 financial administration, those who are surrounding
3 that, taking care of --
- 4 Q I -- I guess I don't understand. You -- you referred
5 to Michelle as being on a financial board.
- 6 A Yeah, you know I rephrased that. I said
7 administration. I think that would be better for you
8 to understand.
- 9 Q All right. So there's three people in the financial
10 administration, those three people you listed with
11 Michelle?
- 12 A Yes.
- 13 Q Okay. And you also referred to Michelle as an
14 executive?
- 15 A Yeah, she's the executive in the ministry.
- 16 Q What does that mean?
- 17 A Well, she execute all the departments and make sure
18 everything is running smoothly overall in all the
19 countries and the states.
- 20 Q So would she be the person that is supervising
21 Deborah Frazier in her work?
- 22 A Yes.
- 23 Q And Deborah Frazier is an unpaid volunteer?
- 24 A She's a volunteer staff.
- 25 Q So it would be Michelle that would be able to tell me

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- 1 what exactly Deborah Frazier does when she's in Saint
2 Louis?
- 3 A Yes.
- 4 Q Okay. Do you have any plans to hire Deborah Frazier?
- 5 A Yes, I really do.
- 6 Q And what -- tell me about those.
- 7 A Well, you know, we are a growing ministry, and we're
8 trying to establish more credibility on a massive
9 scale with the bank --
- 10 Q I'm sorry; what?
- 11 A With the bank with the size of (indiscernible) we
12 have.
- 13 Q All right. Take me back -- you're trying to
14 establish more credibility for the bank?
- 15 A Yes.
- 16 Q What bank?
- 17 A Do I need to answer that --
18 MR. CAVELLIER: If you can.
19 MS. RONAYNE: Well, obviously he knows
20 --
21 THE WITNESS: Yes. Bank of America,
22 you know, and we're -- well -- that's it, right?
23 That's all you need to know.
- 24 BY MS. RONAYNE:
25 Q No, you -- I asked you if you had any plans to hire

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- 1 is one thing, growing in size, so it's different
2 multiple variables --
- 3 Q Okay. Let's go through them. You -- go through each
4 variable for me. When you say growing in size, what
5 do you mean?
- 6 A Well, like I say, that's multiple -- like it could be
7 people --
- 8 Q Okay. Let's start with people.
- 9 A Yeah.
- 10 Q What -- so how do you count people?
- 11 A That's hard other than by television exposure, the
12 amount of responses through that, the amount of
13 countries we are allowed into --
- 14 Q What countries are you in?
- 15 A Well, through media, we're in 192 countries.
- 16 Q Say -- through what?
- 17 A Through media, we're in 192 countries.
- 18 Q Tell me what that means.
- 19 A We're reaching 192 countries.
- 20 Q How does -- how do you do that?
- 21 A Through a television network.
- 22 Q Is there a specific network you use?
- 23 A Yeah, The Way TV out of California.
- 24 Q The Way, W-a-y?
- 25 A TV, yeah.

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- 1 Deborah Frazier, and your response was you did.
2 A Yes, we do.
- 3 Q That you were growing and that you needed to
4 establish credibility with the Bank of America.
- 5 A Well, yeah, with -- I was trying to say that in
6 reference to we are establishing things and growing,
7 and when we are at the size that we can hire more
8 people, she would be one of the ones we would do
9 that.
- 10 Q All right. So how -- when you say you're growing,
11 how do you count your size; what -- what tool do you
12 use, what variable do you use to demonstrate your
13 size?
- 14 A Well, it's multiple --
- 15 Q Okay.
- 16 A -- variables.
- 17 Q Go ahead and list them all.
- 18 A Depend -- depending on what area. If you're talking
19 about in size to the amount of people we're reaching
20 through television and --
- 21 Q Well, you used that term you want to grow. So what
22 are you referring to?
- 23 A Yes. Well, I mean you -- you asking a question that
24 -- I think you're basically referring to the previous
25 question, so you're talking about growing financially

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- 1 Q In California?
- 2 A And also internet, live streaming --
- 3 Q How do you count how many people are doing that?
- 4 A Well, they have ratings and ways you can -- you can
5 figure out who --
- 6 Q I'm sorry --
- 7 A -- who comes on.
- 8 Q You -- you have ways to count --
- 9 A Vaguely, but not quite. Not fully. But we -- we can
10 see all the countries who are responding and all the
11 people who are responding from different countries.
- 12 Q And how do you see that?
- 13 A Through web -- web analysis.
- 14 Q Is there data available?
- 15 A Yeah, there should be, yeah.
- 16 Q There should be. Is -- that's not something you look
17 at?
- 18 A Oh, I -- yeah, I do look at it.
- 19 Q So there is?
- 20 A Yeah, it should be.
- 21 Q Should be or there is?
- 22 A There is.
- 23 Q Okay. So what do you look at to -- to discern how
24 many countries are responding to you?
- 25 A It's a web analysis they have.

- 1 Q Who is they?
- 2 A There's a web analysis named Get Clicky, that's one;
3 another one is Stack Counter. And I don't think
4 neither one of them is totally accurate.
- 5 Q And that tells you what information?
- 6 A (Indiscernible)
- 7 Q With what information?
- 8 A How the -- the amount of people responding from
9 different countries.
- 10 Q Okay. And what's your understanding the amount of
11 people responding from different countries?
- 12 A Well, I know it's -- it's in over 192 countries.
- 13 Q Well, I under -- but we're talking about people, not
14 countries; you -- you said you could tell how many
15 people were responding.
- 16 A Yeah. That's only through -- you know, you can't
17 always gauge by just someone responding, because many
18 people can be looking, and they may not ever respond
19 so, I -- I can't really answer that question very
20 accurately.
- 21 Q You said you thought that these -- these web counter
22 things were 87 to 89 percent accurate --
- 23 A Yeah --
- 24 Q -- that's pretty specific; what does that mean then?
- 25 A Yeah. Well, I mean, you know -- you know, one of

- 1 them may show that there's a lesser amount of people
2 on, and then the other -- like one may show there's
3 8,000 people, the other may show there's 12,000. So,
4 I think it could be broke, or -- it's not quite
5 accurate, so --
- 6 Q So tell me if I'm wrong, does the whole world have
7 192 countries, are there more than that exist?
- 8 A I think there are a few more than that.
- 9 Q Two, three?
- 10 A I'm sorry; what are you saying?
- 11 Q Two or three more; it's 192 how many there -- that
12 exist? So are you saying you -- you just stream TV
13 programs to the whole world?
- 14 A Not only that, you know, like I said, there's a TV
15 network that is reaching --
- 16 Q That's what I'm talking about.
- 17 A Mm-hmm.
- 18 Q That -- so you're saying you use a TV network --
- 19 A And my own personal live streaming. So it's --
- 20 Q What's your personal live streaming?
- 21 A It's JoshuaMediaMinistries.org on our website.
- 22 Q Say that again?
- 23 A JoshuaMediaMinistries.org on our website.
- 24 Q Okay. And you're live streaming what?
- 25 A Services.

- 1 Q To whom? Just on -- on the internet?
- 2 A Yeah.
- 3 Q And how many -- do you do that daily?
- 4 A Not daily, no.
- 5 Q How often?
- 6 A If I have a service in some places that is capable of
7 live streaming -- live streaming like we are here in
8 Taylor.
- 9 Q So you live stream out of Taylor and where else?
- 10 A Anywhere they may have a T-1 line.
- 11 Q Okay. Just give me an example of other places you
12 have done live streaming out of?
- 13 A Saint Louis, if I'm in a church that has the -- the
14 setup for that.
- 15 Q Okay. Where else?
- 16 A It varies. I can't tell you if it -- it just varies;
17 if that pastor or bishop has the -- has the setup for
18 that.
- 19 Q Well, just give me an example of a pastor or a bishop
20 or a church where you've live streamed out of?
- 21 A Uh --
- 22 Q Other than Taylor.
- 23 A Oh, where else? It's been so many places. That's
24 what I let my -- my staff handle that, so I -- I'm
25 trying to -- I don't --

- 1 Q Well, don't you go to them?
- 2 A Oh, I'm there ministering, but I can't -- I can't
3 possibly do everything, you know.
- 4 Q But you -- you said there are so many places --
- 5 A That we have done that.
- 6 Q But you can't give me the --
- 7 A Over the past --
- 8 Q Excuse me; let me finish my question.
- 9 A Oh --
- 10 Q You said there are so many places, but you can't give
11 me the name of any bishop or church from which you
12 have live streamed --
- 13 A I gave you one in Saint Louis --
- 14 Q Let me finish -- let me finish.
- 15 A Okay.
- 16 Q So many places, but you can't give me the name or
17 address of a church or a bishop that you have live
18 streamed from?
- 19 A I just gave you one, but like I said --
- 20 Q Which one?
- 21 A -- I am not -- the one in the Saint Louis. Abundant
22 Life Fellowship.
- 23 Q Okay. Other than that, it --
- 24 A Okay. But like I say, I travel so much and I -- you
25 know, I don't know all the details. I have a staff

1 to do that. If you want that later, I can give that
2 to you.

3 Q You can give me a list of the places you have live
4 streamed?

5 A If -- if that's relevant.

6 THE WITNESS: Do you think it's
7 relevant?

8 MS. RONAYNE: Yeah, I'm -- I'm asking
9 the question.

10 THE WITNESS: Okay, yeah.

11 BY MS. RONAYNE:

12 Q You can provide --

13 MR. CAVELLIER: The -- the answer is
14 no, I don't think it's relevant, but you can go ahead
15 and answer the question --

16 THE WITNESS: Okay.

17 MR. CAVELLIER: -- because I have a
18 standing objection.

19 BY MS. RONAYNE:

20 Q But you're going to provide that to me, the -- within
21 the 30 days before the next dep?

22 A Yeah, I'll try to get some of those to you.

23 Q Okay.

24 MR. CAVELLIER: Subject to my
25 objection.

1 BY MS. RONAYNE:

2 Q You -- now when you live stream, you are giving
3 speeches or whatever through the internet to an
4 audience; is that an accurate --

5 A Um --

6 Q -- description?

7 A I don't know the terminology --

8 Q Use your own then.

9 A -- speeches -- yeah, I -- I think it's teaching and
10 preaching.

11 Q Okay. And in this teaching and preaching, are you
12 asking for money?

13 A We do take up an offering --

14 Q What does that mean --

15 A -- like every other ministry does.

16 Q -- take up an offering; what does that mean? You're
17 asking for money?

18 A You -- do you -- have you ever been to church?

19 Q Have -- are you asking for money?

20 A I'm asking have you ever been to church.

21 Q You don't get to ask me questions.

22 A Well, I'm trying to see --

23 Q It doesn't work that way.

24 A You're trying to get an understanding, right, so I'm
25 trying to give you a reference point --

1 Q I am asking --

2 A But if you don't go to church, it would be no
3 reference point, right?

4 Q I am asking what it means to take up an offering;
5 what does that mean in your terms?

6 A Have you ever been to a Billy Graham crusade?

7 Q Sir, you don't ask me --

8 A I'm -- I'm --

9 Q -- questions.

10 A -- just asking.

11 Q You don't get to ask me questions.

12 A Well, I mean are you trying to understand what I'm
13 saying or --

14 Q I'm asking you to explain it.

15 A That's what I'm trying to do.

16 MR. CAVELLIER: Describe it to the
17 best of your ability.

18 THE WITNESS: Okay. So, you know --

19 BY MS. RONAYNE:

20 Q What does that mean?

21 A It means to -- to have a time where people are able
22 to donate freely to the ministry.

23 Q And -- and you ask them to do that; is that accurate?

24 A Oh, yes.

25 Q Okay. And this would be when you're live streaming

1 in Taylor?

2 A Yes.

3 Q Okay. Have you in this live streaming, publicly
4 indicated that you are trying to get a loan from a
5 bank for JMMI?

6 A Yes.

7 Q Okay. And what bank are you referring to?

8 A Anyone that would have the right interest rate.

9 Q Have you made application?

10 A Yeah, mm-hmm.

11 Q From what banks?

12 A I can't -- I don't know; I can't give you all of
13 them. It's been quite a few, so I have an
14 administrative team who -- who is doing all of that
15 work for me --

16 Q Is that the administrative team with Michelle and
17 those two other women?

18 A Yes, some of them, and some other staff.

19 Q Who signs the loan then, the loan note?

20 A I'm -- I'm sorry?

21 Q Who would sign it if you're -- who -- who makes the
22 application? Let's start with that.

23 A Um --

24 Q Who signs the application?

25 A I'm -- I'm sure it would be board members; would that

1 be -- is that understandable?
 2 Q You --
 3 A Board members.
 4 Q -- you don't know who signs the application for a
 5 loan?
 6 A Board members.
 7 Q Are you on the board?
 8 A Yeah.
 9 Q Do you sign applications for loans?
 10 A When needed. Anything when needed.
 11 Q Who's on the board?
 12 A I have Michelle Brannon.
 13 Q I'm sorry, say that again; Michelle Brannon -- spell
 14 that again.
 15 A Brannon.
 16 Q B-r --
 17 A Brannon, mm-hmm. I gave it to you earlier.
 18 Q I know, I --
 19 MR. CAVELLIER: B-r-a-n-n-o-n.
 20 MS. RONAYNE: B-r-a --
 21 MR. CAVELLIER: Same person we've been
 22 referring to --
 23 THE WITNESS: Yeah.
 24 MR. CAVELLIER: -- throughout this
 25 deposition.

1 MS. RONAYNE: No, I just -- I -- the
 2 way he said it, I thought he said Brennan.
 3 BY MS. RONAYNE:
 4 Q So it's the same person we've been talking about -- I
 5 just referred to her as Michelle, I've met her
 6 before, but I don't know her last name off the top of
 7 my head. The one that was here today?
 8 A Mm-hmm. Yes.
 9 Q Yes? Okay. So Michelle Brannon is on the board?
 10 A Yes.
 11 Q And who else?
 12 A Ashley Ware.
 13 Q The same woman you just --
 14 A Yes.
 15 Q -- referenced was on your -- your financial board?
 16 A Yes. Marcia -- Marcia --
 17 Q Marcia who?
 18 A Her last name is --
 19 Q You don't know the last name of a member of your
 20 board?
 21 A Yes, I do. Marcia Steward.
 22 Q Steward? How do you spell that?
 23 A S-t-e-w-a-r-d.
 24 Q And she's on your board of directors?
 25 A Yeah, mm-hmm.

1 Q And who else?
 2 A Myself.
 3 Q So there's four members on the board of directors?
 4 A Mm-hmm.
 5 Q You have to say yes or no.
 6 A Yes.
 7 Q All right. And Michelle Brannon is a paid employee?
 8 A Yes.
 9 Q Ashley Ware, is she compensated?
 10 A She's volunteer.
 11 Q And Marcia Steward?
 12 A Volunteer.
 13 Q And do all three of those women reside in Saint
 14 Louis?
 15 A Yes.
 16 Q Is it possible that Marcia's last name may be
 17 McDonald?
 18 A Yes, it is McDonald.
 19 Q It's not Steward?
 20 A No.
 21 Q It's not even close, is it?
 22 A Nope.
 23 Q And you're saying Marcia McDonald is a volunteer?
 24 A Mm-hmm.
 25 Q You got to answer yes or no.

1 A Yes.
 2 Q And she's not compensated.
 3 Q No, she has a job.
 4 A What's her job?
 5 Q She's a fireman.
 6 A She's a what?
 7 Q Fireperson -- fireman.
 8 A Fire -- firefighter?
 9 Q If that's how you want to call it.
 10 A Well, she's not a man, so I think the -- is it a
 11 firefighter?
 12 MR. CAVELLIER: It's a fireperson.
 13 THE WITNESS: Yeah.
 14 BY MS. RONAYNE:
 15 Q So you're talking about like a firefighter?
 16 A You can call her whatever you want.
 17 Q Well, I -- no, I'm not going to call her anything.
 18 I'm just trying to make sure we're talking about the
 19 same thing.
 20 A Yeah, I've already stated that.
 21 Q Employed by a city to fight --
 22 A Yes.
 23 Q -- fire?
 24 A Fires.
 25 Q Okay. Do you know what city?

1 A Saint Louis.
 2 MR. FRAZIER: (Indiscernible)
 3 BY MS. RONAYNE:
 4 Q In going through the ledger, it appears that there
 5 are a lot of checks going to -- is her name -- her
 6 first name is Marcia or LaMarcia; which is it?
 7 A LaMarcia.
 8 Q Right.
 9 A Yeah, her name is LaMarcia.
 10 Q So not Marcia?
 11 A No, not Marcia, no.
 12 Q LaMarcia
 13 A LaMarcia McDonald.
 14 Q But you pronounced it Marcia.
 15 A No --
 16 MR. CAVELLIER: Objection.
 17 THE WITNESS: -- I said Marcia.
 18 BY MS. RONAYNE:
 19 Q This -- is it Marcia or Marcia?
 20 A Yeah. We don't call her by LaMarcia, we call her
 21 Marcie. That's what she goes by.
 22 Q Marcie?
 23 A Yeah.
 24 Q Okay. So LaMarcia -- in looking at your ledger --
 25 A Mm-hmm.

1 Q Is that something that's referred to as safe savings?
 2 A Yes, I -- I guess if that's on there; is that on
 3 there?
 4 Q No, I'm asking you if that's your terminology; safe
 5 savings refers to --
 6 A The savings account.
 7 Q For -- and -- and where -- what bank is that in?
 8 A Should be Bank of America. Well, we got another bank
 9 too.
 10 Q What's the other one?
 11 A Cloverleaf.
 12 Q Who is that?
 13 A It's a -- it's a smaller bank in -- in Illinois.
 14 Q What city is that?
 15 A Illinois.
 16 Q What city? That's a state.
 17 A You know what, I don't know. I really don't.
 18 Q How did you end up at Cloverleaf?
 19 A Through mutual connections of the VIP.
 20 Q What's the VIP; what does that mean?
 21 A Well, the VP of the bank; sorry.
 22 Q What's this person's name?
 23 A Honestly, I don't know his name.
 24 Q Is this somebody that -- that you have mutual
 25 connections with?

1 Q -- it looks like there are a lot of checks that are
 2 disbursed to LaMarcia McDonald.
 3 A Are you sure, because I don't -- I don't know that --
 4 I know she's able to sign checks to take care of
 5 bills and stuff like that, but for her to be getting
 6 that many checks, I don't --
 7 Q Who -- who can sign checks?
 8 A -- think you're reading that accurately.
 9 Q Who can sign checks?
 10 A Board members.
 11 Q So those three women and you?
 12 A The board.
 13 Q Those three women and you?
 14 A Yes. The board, that's --
 15 Q But that's who we're talking about, those three women
 16 --
 17 A (Indiscernible)
 18 Q What is safe savings?
 19 A Safe savings?
 20 Q Mm-hmm.
 21 A Are you saying savings?
 22 Q Safe, s-a-f-e, savings, s-a-v-i-n-g-s.
 23 A The only savings I know about is my account that I
 24 put money aside for, for the ministry to save
 25 finances, so we don't spend everything.

1 A No, my board has --
 2 Q Who -- who on your board has a connection with the VP
 3 there?
 4 A Michelle.
 5 Q And what do you use that bank for?
 6 A We have a -- a secure line of credit with them.
 7 Q And what's it secured by?
 8 A Can you phrase that in a little bit more detail?
 9 Q Well, you said you had a secured line of credit with
 10 that bank, and I'm asking you what is it secured
 11 with?
 12 A I mean with our own cash flow.
 13 Q That's not what a secured line of credit would mean.
 14 It's usually attached to some asset.
 15 A No, it's not. Not really. You don't have to have
 16 that to have a secure line of credit.
 17 Q You don't -- you have not pledged any collateral for
 18 this?
 19 A That's what I'm saying; cash is the collateral.
 20 Q And what cash are you referring to?
 21 A Ministry cash to build a relationship with the bank.
 22 Q So do you deposit savings in this Cloverleaf Bank?
 23 A You know, I'm not sure. I have them taking care of a
 24 lot of things, so --
 25 Q Who is them?

1 A Like I said, my financial administration.
 2 Q All right. There, for example, on July 23rd, 2013,
 3 it says -- I -- I think it's LaMarcia McDonald
 4 monthly safe savings \$3,567.00; what -- what is that
 5 --
 6 A That's putting money aside from the account as money
 7 flows in to save.
 8 Q But why is Mar -- LaMarcia McDonald's name
 9 referenced?
 10 A I don't know. I -- she's the one that takes the
 11 money and handles that. She's on the bank card with
 12 Bank of America.
 13 Q On the bank card?
 14 A Yeah, the Bank of America.
 15 Q What do you mean on the bank card?
 16 A You know, they give you debit cards and they also
 17 give you -- the bank gives you -- if you're a signor
 18 on the account, you can -- you know, you have the
 19 power to sign for checks and different things.
 20 Q So she has a debit card for the ministry --
 21 A A ministry debit card.
 22 Q Okay. Then on August 1st, 2013, it just says
 23 LaMarcia McDonald and --
 24 MR. CAVELLIER: What are you
 25 referencing?

1 expenses. All these are personal expenses --
 2 Q Well, then why --
 3 A This is not ministry.
 4 Q Okay. On the -- on that same page that I'm
 5 referencing, page two --
 6 A Okay.
 7 Q -- on July 23rd, 2013 it says LaMarcia McDonald
 8 monthly safe savings, and you testified that was
 9 ministry.
 10 A I'm sorry; I didn't know exactly what you -- now I
 11 have it in front of me. So this --
 12 Q If you look at page two --
 13 A Yes, I understand.
 14 Q -- okay, and look at an entry July 23rd, 2013 --
 15 A Yes.
 16 Q -- and it says LaMarcia McDonald monthly safe savings
 17 \$3,567.02.
 18 A Yes. This --
 19 Q That's ministry, is it not?
 20 A -- this is -- no, no, no, no.
 21 Q Oh, it's not ministry?
 22 A No, no. I thought -- I'm sorry; like I said, you --
 23 I didn't know you were coming from this personal
 24 document. I thought it was a ministry thing.
 25 Q Well, isn't that ministry? You just --

1 THE COURT: The -- the ledgers you
 2 gave us.
 3 MR. CAVELLIER: What page?
 4 MS. RONAYNE: I -- well, I'm doing it
 5 by date, so I said it by date.
 6 MR. CAVELLIER: Well, there's a page
 7 number on the bottom.
 8 MS. RONAYNE: Two.
 9 BY MS. RONAYNE:
 10 Q It references LaMarcia McDonald \$400.00 on August
 11 1st, 2013, another August 1st, 2013, \$100.00, then it
 12 says August 2nd, 2013 LaMarcia McDonald Destiny's
 13 hair \$50.00.
 14 A I don't know what that is.
 15 Q Could that be your daughter, Destiny?
 16 A That's her name, but I don't know why is that written
 17 like that.
 18 Q Does the ministry pay for her hair to be done?
 19 A No. I pay for all expenses out of my own personal
 20 income. So I don't know how that's there. Is that
 21 ministry money flow or is that personal?
 22 Q It says JMMI down at the right-hand corner.
 23 A Is that my personal life of income or is it --
 24 Q It's on the same page as --
 25 A So personal savings. So you're saying personal

1 A No, all of this is personal --
 2 Q Let me -- let me ask -- let me --
 3 A It's personal.
 4 Q Let me ask a question.
 5 A Okay. See, I have a savings account --
 6 Q Let me ask a question --
 7 A -- with the ministry and one for my personal --
 8 Q Let me ask the question, okay?
 9 A Okay. Mm-hmm.
 10 Q I referenced July 23rd, 2013, LaMarcia McDonald
 11 monthly safe savings --
 12 A Yes.
 13 Q -- and you testified that that was money from the
 14 ministry that went into a savings so you could build
 15 up cash.
 16 A Yes, that was my fault. Yes.
 17 Q Okay. So that is on a document that you presented as
 18 a ledger that is -- is JMMI in the corner --
 19 MR. CAVELLIER: Well, let's be clear
 20 that this JMMI in the corner was produced by my
 21 office. This -- the JMMI was something that we put
 22 on there to reference for our retrieval.
 23 THE WITNESS: But this says personal.
 24 MS. RONAYNE: Today?
 25 MR. CAVELLIER: Yesterday.

1 MS. RONAYNE: So --

2 THE WITNESS: So now that I know it's

3 personal, now I can address this more accurately. I

4 was wrong. I have a ministry account where we save

5 money in our ministry, but I also have a personal

6 account that any money that comes to me I put aside a

7 certain amount each month.

8 BY MS. RONAYNE:

9 Q What do you mean money that comes to you?

10 A Well, I get a salary, and for a while I -- my salary

11 was bigger, 70,000 a year, but then I cut that in

12 half to about 30 to 27,000 --

13 Q Well, this reference for July 23rd, 2013 that says

14 LaMarcia McDonald monthly safe savings --

15 A Yeah, she's -- she's over some of my personal affairs

16 in taking things out and adhering to kind of some of

17 the things I want done with my account. So that's

18 what that means. This is not -- none of this is

19 ministry; this is all personal.

20 Q Then I don't have the ministry -- he's saying this is

21 personal.

22 A Oh, the ministry is in the back. I can see that now.

23 Q So you're saying you personally --

24 A These first three pages --

25 Q Let me --

1 A -- are personal --

2 Q Sir, let -- let me ask you a question. So you're

3 saying that this entry of safe savings that you

4 previously identified as something for the ministry

5 is actually your personal savings?

6 A Yes. Yes, exactly.

7 Q And when you say when you come into money -- you say

8 have -- you have a salary --

9 A Well, come into money --

10 Q That's the ref -- that's what you -- a term you used;

11 when I come into money --

12 A I mean -- no, no. When I get paid a paycheck.

13 Q Okay.

14 A You understand what that means about a paycheck? A

15 paycheck -- if I get a salary that's \$70,000.00 a

16 year, then --

17 Q What was your salary --

18 A -- I'm able to take more --

19 Q -- in 2013?

20 A I don't know, because we made adjustments --

21 Q You don't know what you earned in 2013?

22 A Not -- not fully. I -- I know I started cutting

23 things in half, so I want to be accurate, but I can

24 get all of that information for you --

25 Q I'm sorry?

1 A I said I can get all that information for you, it's

2 proprietary --

3 Q Proprietary; what does that --

4 A Yeah, proprietary information --

5 Q What do you mean by that?

6 A It's open.

7 Q That's not what that word means.

8 A You should know. Well, it don't matter; you know

9 what I mean.

10 Q No -- no I don't. That's what I'm asking.

11 A You do know what I mean -- so you know what the

12 sentence mean; let's just move on. Let's not be

13 children. That -- I -- I think that you understand

14 what I'm trying to say --

15 Q No, I don't, sir.

16 A That everything is -- whatever I have, you can have.

17 It's not a problem. About myself --

18 MR. CAVELLIER: You know, let's

19 proceed with questions and answers.

20 BY MS. RONAYNE:

21 Q Well, I'm -- I'm trying to figure out if there are

22 ministry ledgers produced or if it's just all

23 personal?

24 A Well, if you really -- I don't think you really have

25 chance to look at everything --

1 Q No, I have looked at some, but not --

2 A I know, so I can kind of see you're a little off by

3 this because this -- these first few pages is

4 personal --

5 Q I'm sorry?

6 A And then down here is ministry, so it's all together,

7 but there's a part that's personal --

8 MS. RONAYNE: Can you --

9 THE WITNESS: -- and a part that's --

10 MS. RONAYNE: Can you mark that?

11 THE WITNESS: -- ministry.

12 (WHEREUPON, Deposition Exhibit Number

13 Two was marked at 4:54 p.m.)

14 MS. RONAYNE: Do you want to see them?

15 BY MS. RONAYNE:

16 Q Can you identify that document that's marked as

17 Exhibit Two?

18 A Yes.

19 Q And what is it?

20 A It's a W-2.

21 Q For whom?

22 A Me.

23 Q And your name is listed as what?

24 A David Taylor.

25 Q And what year is that for?

1 A 2013.
 2 Q And how much is the W-2?
 3 A 27K.
 4 Q 27,000 even?
 5 A Yes.
 6 Q Okay. If I may have that?
 7 A Mm-hmm.
 8 Q So is it your testimony that this W-2 that you've
 9 identified, accurately lists your wages from Joshua
 10 Media Ministry?
 11 A Yes.
 12 Q And that's who issued -- issued this W-2?
 13 A Who issued it?
 14 Q Joshua -- Joshua Media Ministries?
 15 A Yes.
 16 Q Okay. So you're saying from this \$27,000.00 salary -
 17 - that reflects your salary? You have to -- I -- I
 18 think --
 19 A Yes.
 20 Q Okay. That these monthly savings of \$3,500.00 plus -
 21 -
 22 A Is that every month?
 23 Q Hold -- hold on. That those savings came from your
 24 salary?
 25 A Well, it depends on the money flow. Like if my bills

1 Q Okay.
 2 A That would be great.
 3 MR. CAVELLIER: Wait a second. Let's
 4 be clear. The bank statements you requested were
 5 those that reflected moneys from Deborah Frazier.
 6 Are you asking for something different now?
 7 MS. RONAYNE: Well, I -- I'm not sure
 8 Mr. Taylor can explain to me if this is ministry
 9 money or his personal money; there seems to be some
 10 confusion --
 11 MR. CAVELLIER: Well, he said he can't
 12 --
 13 THE WITNESS: This is personal --
 14 well, I mean from what -- it looks like it, but I
 15 can't fully answer because I don't have the person
 16 who was -- who handles all my --
 17 BY MS. RONAYNE:
 18 Q Can -- well, can you talk to her between now and the
 19 next deposition --
 20 A I sure can.
 21 Q -- to kind of refresh your memory?
 22 A I can do that. And we can answer that for you.
 23 Q Okay.
 24 A I understand why this --
 25 MR. FRAZIER: (Indiscernible)

1 are lesser or higher in each month, I have more I can
 2 save. So I don't know if you're looking at
 3 \$35,000.00 every month; do it say every month --
 4 Q Well, if -- if you look at what I was referring to as
 5 page two --
 6 MR. FRAZIER: (Indiscernible)
 7 MS. RONAYNE: Okay.
 8 BY MS. RONAYNE:
 9 Q July 23rd, 2013 where you take out \$3,567.02, and --
 10 that seems like a pretty specific amount; how would
 11 that be arrived at?
 12 A You know, I'm -- I'm -- because she's over that, I
 13 really don't --
 14 Q Because she's over that?
 15 A Yeah, she's over this part of it. I don't know. I
 16 see what's being written here, but I really need them
 17 to help answer this, you know, for me.
 18 Q Okay. Do you have a -- a bank statement that shows
 19 where that would have gone into?
 20 A Oh, yeah, all of this.
 21 Q Can you --
 22 A That's why it's --
 23 Q Will you produce your bank statements that we asked
 24 pursuant to the subpoena?
 25 A Of course.

1 MS. RONAYNE: Give me -- I'm trying to
 2 read something --
 3 MR. FRAZIER: This one says personal -
 4 -
 5 BY MS. RONAYNE:
 6 Q Look at that page one of that -- that document we
 7 were reviewing before.
 8 A Okay.
 9 MS. RONAYNE: You know, I'll just have
 10 --
 11 MR. CAVELLIER: Which doc --
 12 MS. RONAYNE: -- this marked, so we're
 13 clear.
 14 (WHEREUPON, Deposition Exhibit Number
 15 Three was marked at 4:59 p.m.)
 16 BY MS. RONAYNE:
 17 Q This is proposed Deposition Exhibit Three. It is
 18 part of what you handed me as the ledger --
 19 A Okay.
 20 Q -- and page numbers one through 11 that go from July
 21 1, 2013 to November 8th, 2014. And do you see what
 22 I'm referring to? It starts with beginning balance
 23 of July 1st, 2013, and it says \$1,496.42. Are you
 24 looking at that same document?
 25 A What page would you say?

1 Q The top page.
 2 A Okay. And where?
 3 Q The -- I'm just trying to identify --
 4 A Here? Okay.
 5 Q -- that we're all looking at the same thing.
 6 A Okay, yes, okay.
 7 Q And it says \$1,496.42.
 8 A Yes.
 9 Q All right. Is this -- this is Joshua Ministries,
 10 isn't it?
 11 A No, this is personal.
 12 Q It's personal? Okay.
 13 A Right.
 14 Q So this is personal, and -- I'm sorry, I'm going to
 15 have to take a moment -- if you give me a second,
 16 this is very small print.
 17 A Yeah.
 18 MR. FRAZIER: The bottom line
 19 (indiscernible) \$5,000.00 payroll --
 20 MS. RONAYNE: All right.
 21 BY MS. RONAYNE:
 22 Q Look at July 15, 2013. It says JMMI DES colon
 23 payroll, and then it lists your name, and it says
 24 \$5,000.00.
 25 A Mm-hmm.

1 Q Do you see that?
 2 A Yes.
 3 Q Okay. And then the next page on the date July 31st,
 4 there's a \$5,000.00 line that says JMMI salary; do
 5 you see that?
 6 A Where is that? One more --
 7 Q July 31st --
 8 A Okay, yeah --
 9 Q -- on page two.
 10 A -- I see that. Mm-hmm.
 11 Q JMMI salary \$5,000.00.
 12 A Right. Mm-hmm.
 13 MR. FRAZIER: August 15th --
 14 BY MS. RONAYNE:
 15 Q August 15th --
 16 MR. CAVELLIER: Okay. I've got to
 17 place the same objection on the record that Mr.
 18 Jenkins placed earlier. This is -- clearly, your
 19 client is in part conducting this deposition. And
 20 this is not appropriate.
 21 MS. RONAYNE: He's directing me -- I'm
 22 going to give you an explanation. He's directing me
 23 to the microprint that is very difficult to read of
 24 the documents that you gave me --
 25 MR. CAVELLIER: He's whispering

1 questions --
 2 MS. RONAYNE: -- well after -- excuse
 3 me --
 4 MR. CAVELLIER: -- in your ear --
 5 MS. RONAYNE: No, he's telling me --
 6 MR. CAVELLIER: -- and you are asking
 7 the questions.
 8 MS. RONAYNE: -- he's -- no, that's
 9 not accurate.
 10 MR. JENKINS: Your client --
 11 MS. RONAYNE: He's showing me what
 12 line.
 13 MR. CAVELLIER: I can hear him.
 14 MR. JENKINS: I'll place the same
 15 objection.
 16 MS. RONAYNE: That's fine.
 17 MR. JENKINS: He's directing the
 18 deposition. He's directing the questions. He's
 19 conducting the inquiry. That's your job.
 20 BY MS. RONAYNE:
 21 Q August 15th, 2013, the line says Joshua Media
 22 Ministry, same thing, DES, I don't know what that
 23 means, payroll, David Taylor, and it's another
 24 \$5,000.00 -- \$5,000.00 for payroll.
 25 A Okay.

1 Q Now, would you acknowledge that's a payroll payment
 2 to you?
 3 A Yeah, but some of this, the way they -- they have
 4 this factored in here is I get housing allowance
 5 under the -- the ministerial thing --
 6 Q Under the ministerial thing.
 7 A Yes.
 8 Q I don't know what that means.
 9 A Yeah. You -- well, you have to study like church
 10 law, tax law, that kind of stuff, but -- but the --
 11 the thing is at one time they were just giving me
 12 that total payroll check of 5,000, I think, every
 13 semi-weekly, and I was paying out of that my -- you
 14 know, all the expenses.
 15 Q So you acknowledge that you --
 16 A Instead of it just going --
 17 Q Let -- let me ask you a question --
 18 A -- instead of the ministry paying -- yes.
 19 Q You were receiving \$5,000.00 in salary checks it
 20 looks like twice a month --
 21 A Mm-hmm.
 22 Q -- is that yes?
 23 A Yes, mm-hmm.
 24 Q And -- as your compensation for Joshua Media
 25 Ministries; is that accurate?

1 A Yes.

2 Q And yet in that same year, your W-2 shows -- what was
3 it, \$27,000.00?

4 A Yes, mm-hmm.

5 Q Do you see a discrepancy between --

6 A No --

7 MR. CAVELLIER: Objection to the form
8 of the question. He's answering the question to the
9 best of his ability. But he's not a CPA.

10 MS. RONAYNE: I didn't finish the
11 question.

12 MR. CAVELLIER: Do you see a
13 discrepancy, question --

14 MS. RONAYNE: I didn't finish it. No,
15 you interrupted me.

16 MR. CAVELLIER: Okay.

17 MS. RONAYNE: I -- I didn't finish the
18 --

19 MR. CAVELLIER: Then finish the --

20 MS. RONAYNE: -- my sentence.

21 MR. CAVELLIER: -- question and wait
22 for me.

23 THE WITNESS: Okay.

24 BY MS. RONAYNE:

25 Q Do you believe that the -- the W-2 is consistent with

1 understand why it lists \$5,000.00 twice a month?

2 A Because I don't handle the finances.

3 Q You don't handle your own finances?

4 A I really don't. I have people who do that for me.

5 Q So when you get a salary check, you -- you're -- you
6 have no idea anything about it?

7 A I know I've set up a -- a team that does it for me,
8 and so I -- some of these questions I just can't -- I
9 can't answer, because of the way they have it flowing
10 here, I -- I can't --

11 Q So will you present Michelle Brannon for a deposition
12 so that she can answer these questions more
13 accurately?

14 THE WITNESS: What do you feel?

15 MR. CAVELLIER: Well, you're the
16 lawyer; if you want to subpoena her for a deposition
17 --

18 MS. RONAYNE: Well, I'm -- I'm asking
19 if he's willing to produce her.

20 THE WITNESS: What do you feel?

21 MR. CAVELLIER: If you properly
22 subpoena her and serve her with a notice --

23 MS. RONAYNE: So you're not going to
24 produce her voluntarily?

25 MR. CAVELLIER: Well --

1 this ledger that shows you were paid \$5,000.00 twice
2 a month?

3 MR. CAVELLIER: Objection; calls for
4 speculation. He's not an accountant. He already
5 testified he's not the financial person. This is the
6 JMMI way of accounting. If you have specific
7 questions for the financial team or the CPA, you can
8 contact them and schedule a deposition. He's
9 answering to the best of his ability.

10 MS. RONAYNE: Okay. He can still
11 answer the question.

12 BY MS. RONAYNE:

13 Q This -- this is your personal ledger; is that right,
14 sir?

15 A Yeah. But I'm not --

16 Q No, no, sir. I'm just asking you --

17 A I'm not the one who does it -- yes.

18 Q Is it your personal ledger?

19 A It is.

20 Q Reflecting your finances?

21 A Yes.

22 Q That you provided pursuant to the subpoena pursuant
23 to this deposition and a court order?

24 A Yes. Yes.

25 Q Okay. And you're now saying you don't, what,

1 MS. RONAYNE: That's the question.

2 Are you going to produce her voluntarily so that she
3 can answer --

4 MR. CAVELLIER: We can discuss this
5 off the record.

6 MS. RONAYNE: -- these questions?

7 MR. FRAZIER: (Indiscernible)

8 MS. RONAYNE: Can you mark this,
9 please?

10 (WHEREUPON, Deposition Exhibit Number
11 Four was marked at 5:06 p.m.)

12 BY MS. RONAYNE:

13 Q I'm going to show you what's marked as Deposition
14 Exhibit Number Four, which is the 990 form from the
15 Department of Treasury for the return of an
16 organization exempt from income tax, which your
17 attorney presented to me today. Can you identify
18 that?

19 A I'm sorry; yeah.

20 Q Can you identify that as the return for JMMI?

21 A Yes.

22 Q All right. And on page 11 of this tax return, can
23 you read line one across, please?

24 A Yes. 100 --

25 Q No, read -- read what it says across the whole line.

- 1 A Oh, David E. Taylor, CEO.
- 2 Q Okay. And -- and then what's the next --
- 3 A \$40.00, right? Or 40 -- yeah, \$40.00.
- 4 Q That's a -- okay. Read what's above it and then what
- 5 --
- 6 A Oh, okay. All right. Average hours per week, list
- 7 any hours for related organizations below dotted
- 8 line.
- 9 Q And what does it say below that?
- 10 A 40 hours or 40 --
- 11 Q Okay. Repre -- representing or referring to 40
- 12 hours?
- 13 A Yeah, I guess.
- 14 Q Okay. And what's the next block?
- 15 A Position, do not check more than one box unless
- 16 person is both an officer and a director trustee.
- 17 Q And what's listed below that?
- 18 A Individual trustee, individual trustee or director,
- 19 officer, key employee --
- 20 Q No, I -- I'm sorry; I --
- 21 A Okay.
- 22 Q -- what I want you to do is to indicate where it's
- 23 marked by an X as being applicable to you.
- 24 A Okay. Yes, that's X in individual trustee or
- 25 director, key employee, and highest compensated

- 1 Q Well, you're the CEO of the -- of the ministry?
- 2 A Yes, I am.
- 3 Q Who signs the tax return?
- 4 A Well, the tax returns?
- 5 Q Right.
- 6 A What tax returns?
- 7 Q That tax return. Who signs this? Do you sign it as
- 8 CEO?
- 9 A I think that I do. I'm -- I'm not quite sure about
- 10 all of that.
- 11 Q You don't know if you signed a tax return?
- 12 A No, the only tax return I know I signed is my
- 13 personal.
- 14 Q So who would sign the JMMI tax return?
- 15 A I mean obviously it would probably be a -- a board
- 16 member or myself. But I -- I can't remember doing
- 17 it. I think that someone on the board does it.
- 18 Q Who would that be?
- 19 A Because the board -- well, I don't know; I can't tell
- 20 you --
- 21 Q All right. So you're saying that you don't think
- 22 that one's accurate then, because it reports 119,000
- 23 and you think they redid it?
- 24 A I -- I didn't say it was not accurate; I just said I
- 25 don't -- I can't give you accurate information, and I

- 1 employee.
- 2 Q Okay. And then under subdivision D, tell me what
- 3 that says and what's reported for you?
- 4 A Reportable compensation for the organization,
- 5 \$119,916.00.
- 6 Q So JMMI Ministries reported your income on their tax
- 7 return as 119,000?
- 8 A You know, I can't answer accurately about this, but I
- 9 do know that all of this is not just personal income,
- 10 it's allowances that go to other things. So they
- 11 were at first giving me money, but we were paying all
- 12 what the ministry was supposed to pay under that code
- 13 of ministry standards, so I think our CPAs taught
- 14 them a -- a more accurate way to do it and so I think
- 15 that was some kind of change, so I don't -- I don't
- 16 know; I can't accurately speak, but I think you --
- 17 you would need to talk to my financial board, because
- 18 they -- all of this is accurately written down, so --
- 19 Q I thought you just said that there were changes and
- 20 it doesn't accurately reflect it?
- 21 A No, there were changes, but I can't tell you all
- 22 those things though.
- 23 Q So --
- 24 A It would be better for you to try to, you know,
- 25 gather --

- 1 -- instead of in front of this deposition trying to
- 2 explain something I don't know, I would rather for --
- 3 to just let you know I don't know, because I have
- 4 other people doing this for me. So the way they may
- 5 be --
- 6 Q It -- is --
- 7 A -- doing this may be -- it's all legitimate, but the
- 8 way they have it set up is the way they are doing it
- 9 to the best of their ability, so --
- 10 MS. RONAYNE: It's not clear if these
- 11 are the tax returns that were actually submitted
- 12 based on his testimony, so I need to be able to ask
- 13 him if these tax returns were -- who they were signed
- 14 by, and if they were actually submitted, because his
- 15 testimony would seem to be that some of this was
- 16 corrected and none of it are signed and he can't tell
- 17 me who signs it. So I have no idea if it's the tax
- 18 return or a draft, so can we get a tax return that he
- 19 will be able to state under oath is the tax return
- 20 that was filed?
- 21 MR. CAVELLIER: He or somebody in his
- 22 organization, yes.
- 23 MS. RONAYNE: Okay. So I'll -- I'll
- 24 be able to get -- well, I'm sure he can -- as -- as
- 25 the CEO --

1 MR. CAVELLIER: Again, this is a
 2 deposition where you ask the deponent questions. If
 3 you want to have discussions about --
 4 MS. RONAYNE: No, I'm asking you on
 5 the record, because the documents that you've
 6 presented --
 7 MR. CAVELLIER: I'm not going to
 8 commit to anything on the record. We can discuss
 9 this off the record, and I will get you what is
 10 reasonably required.
 11 MS. RONAYNE: Okay. This was provided
 12 by court order and subpoena that I was to get it, and
 13 the problem is his testimony is indicating that he
 14 can't substantiate --
 15 MR. CAVELLIER: It was provided --
 16 MS. RONAYNE: I'm going to finish my
 17 sentence.
 18 MR. CAVELLIER: It was provided by
 19 other people --
 20 MS. RONAYNE: I am going to finish my
 21 sentence, before you interrupt.
 22 MR. CAVELLIER: It was provided --
 23 MS. RONAYNE: I --
 24 MR. CAVELLIER: -- by other people at
 25 JMMI, not --

1 MS. RONAYNE: But that's fine. So I
 2 am asking him in compliance with the court order and
 3 the subpoena and you as his attorney, will you
 4 provide me with a tax return that should have been
 5 provided today that he can attest is the actual one
 6 that was submitted.
 7 MR. CAVELLIER: Okay.
 8 MS. RONAYNE: Can you do that?
 9 MR. CAVELLIER: And I'm telling you he
 10 will provide you with a document. This is probably
 11 the one that was -- most likely the one that was
 12 filed.
 13 MS. RONAYNE: Well --
 14 MR. CAVELLIER: He doesn't have
 15 personal knowledge of it. All that means is that you
 16 have the wrong deponent.
 17 MS. RONAYNE: No it does not, because
 18 he was asked as CEO of JMMI to produce these
 19 documents pursuant to court order, and the court
 20 order says he is to bring them, and he can't tell me
 21 that he brought the right stuff. So I'm asking you
 22 are you going to give me the right information?
 23 MR. CAVELLIER: Okay. We'll have this
 24 discussion off the record.
 25 MS. RONAYNE: No, I want to have it

1 now. I want to know -- I don't want to have to file
 2 a motion --
 3 MR. CAVELLIER: I'm not your deponent.
 4 MS. RONAYNE: -- and -- and have you -
 5 -
 6 MR. CAVELLIER: We'll have this
 7 discussion off the record.
 8 MS. RONAYNE: You're his -- you're his
 9 attorney. Are you going to provide me what was
 10 supposed to be provided pursuant to the subpoena; yes
 11 or no? It's real simple.
 12 MR. CAVELLIER: Do you want to
 13 continue asking the deponent questions or are you
 14 going to ask me questions?
 15 MS. RONAYNE: Yeah, I want an answer
 16 to that one; are you saying you won't tell me that --
 17 whether or not you'll provide it?
 18 MR. CAVELLIER: I'm telling you --
 19 MS. RONAYNE: Is that -- just yes or
 20 no. Are you telling me you're not going to do it?
 21 MR. CAVELLIER: -- we can -- we can
 22 discuss it off the record. No, I didn't say that.
 23 MS. RONAYNE: Yeah, the exhibits I
 24 need back.
 25 MR. CAVELLIER: That's mine.

1 MS. RONAYNE: I think that's -- there
 2 you go. Okay.
 3 MR. FRAZIER: (Indiscernible)
 4 THE WITNESS: Oh, this is yours?
 5 MS. RONAYNE: Yeah.
 6 THE WITNESS: Okay.
 7 MS. RONAYNE: All right.
 8 BY MS. RONAYNE:
 9 Q So what is your salary at JMMI now?
 10 A From what I know, I --
 11 Q From what you know?
 12 A Yeah. I think it's around 27 to 30,000, something
 13 like that.
 14 Q And what expenses are you saying that JMMI pays on
 15 your behalf?
 16 A Well, it's the expenses under the lawful clergy --
 17 Q What are they?
 18 A I don't know. You'll have to go research that.
 19 Q Well --
 20 A I can't tell you.
 21 Q No.
 22 A I don't know every --
 23 Q There is no research I can do that will tell me what
 24 JMMI is paying for you.
 25 A Well, what I'm saying is we abide by those laws, so

1 that's -- that's where it would be, so --

2 Q No, sir --

3 A I'm just saying I can't tell you; I don't know.

4 Q You have no idea what expenses JMMI pays --

5 A I know housing allowance; I know that.

6 Q How much is that?

7 A I'm not sure. I don't know.

8 Q What other allowance?

9 A There is -- I -- I don't want to misstate, so I -- I

10 don't know. I'd rather for someone who is

11 professional to tell you about that.

12 Q Well, no, I'm asking about your personal -- not in

13 theory --

14 A But you're asking about ministry --

15 Q No sir, let me finish.

16 A -- stuff.

17 Q Let me finish.

18 A I'm answering you.

19 Q No, don't -- don't interrupt; let me finish the

20 question.

21 A Okay.

22 Q I'm asking what personal allowance JMM Ministry

23 provides you or stipends for housing, or -- or

24 automobile or whatever; what do they provide you?

25 A You know, I -- I know there are many allowances, but

1 one that I can say is housing allowance. But in

2 order for you to get the accurate names for what they

3 allow, you have to talk to a professional.

4 Q That's --

5 A Because I -- I don't want to give you misinformation.

6 Q No, I'm not asking in theory what is possible; I'm

7 asking what actually JMMI provides to you.

8 MR. CAVELLIER: Objection; asked and

9 answered.

10 THE WITNESS: I can't -- I can't

11 answer --

12 MR. CAVELLIER: And he said he doesn't

13 know.

14 MS. RONAYNE: It's not -- it's non-

15 responsive.

16 THE WITNESS: I just don't know. I'm

17 just telling you the truth.

18 MS. RONAYNE: Okay. Well, that's an

19 answer. But that's not what you had told me before.

20 BY MS. RONAYNE:

21 Q Do you know if they pay --

22 A That's not true.

23 Q -- any of your auto expenses?

24 A Yes, the -- the car is in the ministries name; they -

25 - they all belong to the ministry.

1 Q What cars are those?

2 A But that -- that is not -- I pay for my own -- my own

3 car --

4 Q What's your car?

5 A My own -- a Range Rover.

6 Q And is that leased, owned?

7 A It's leased -- I mean it's not leased, but it's -- I

8 -- I bought it to pay it off in five years.

9 Q Okay. So it's subject to a lien, but you purchased

10 it?

11 A I'm sorry --

12 Q You owe on it?

13 A Yes.

14 Q Okay. But you did not lease it?

15 A No.

16 Q And is that what you drive in Saint Louis?

17 A Yes.

18 Q Who drives the Bentley?

19 A My driver.

20 Q Who is your driver?

21 A I have a number of drivers, so let's say James or

22 Cliff. And they're responsible for picking up our --

23 our guests in those cars that fly in for meetings and

24 things like that.

25 Q And the same thing with the 2007 Mercedes Benz?

1 A Yes.

2 Q 2008 BMW?

3 A Yes.

4 Q Are those owned outright or subject to any kind of

5 loan?

6 A They're owned.

7 Q Outright? There's no loan on those?

8 A No.

9 Q Okay. When you come to Michigan --

10 A Mm-hmm.

11 Q -- do you generally fly here?

12 A Yes.

13 Q And who picks you up from the airport?

14 A It varies; different staff. It could be anyone.

15 Q It could be a volunteer?

16 A Yeah.

17 Q Has Mrs. Frazier ever picked you up from the airport?

18 A No.

19 Q Have you ever been driven around in Mrs. Frazier's

20 car when you've been in Michigan?

21 A No, I -- I rent a car when I'm here.

22 Q You've never been driven around in Mrs. Frazier's

23 car?

24 A I don't think I have. Not that I can recall. I

25 usually rent my own vehicles here, or I have my own

1 vehicles driven up here.
 2 Q From where?
 3 A From Missouri.
 4 Q For the weekend?
 5 A No, I mean I may stay here seven days or maybe 14
 6 days, but because it's so much rent here, I just rent
 7 a car while I'm up here, or the ministry provides a
 8 rental car for me.
 9 Q It --
 10 A Like we have now.
 11 Q You've been seen being driven around in Mrs.
 12 Frazier's car -- that is identified as her car with
 13 her license plate.
 14 A Really?
 15 MR. JENKINS: Objection to foundation.
 16 MR. CAVELLIER: Objection. And this
 17 is a question?
 18 MS. RONAYNE: I -- he interrupted me
 19 and so did the two of you.
 20 MR. JENKINS: There's no question.
 21 MS. RONAYNE: I didn't finish the
 22 sentence.
 23 BY MS. RONAYNE:
 24 Q You've been seen being driven around --
 25 A Really?

1 Q -- in Mrs. Frazier's car, with her license plate --
 2 A Okay.
 3 Q -- specifically in Taylor; you arrived in that car --
 4 A Okay.
 5 Q -- at one of your events there. Do you not recall
 6 that?
 7 MR. JENKINS: Foundation;
 8 argumentative.
 9 MS. RONAYNE: Go ahead.
 10 THE WITNESS: I don't -- I don't -- I
 11 mean we -- I thought it was a rental car, because we
 12 rent cars all the time. We -- as should be, so it --
 13 it probably could have been her car; I don't know. I
 14 don't know all the details that go on when they pick
 15 me up in what car or what; I'm -- I'm just -- that's
 16 not something I detail.
 17 BY MS. RONAYNE:
 18 Q So you don't know whose car it is that's being --
 19 that you're being driven --
 20 MR. CAVELLIER: Objection; asked and
 21 answered. Now you're being argumentative. He
 22 answered --
 23 BY MS. RONAYNE:
 24 Q You don't --
 25 MR. CAVELLIER: -- your question and

1 said he didn't know.
 2 BY MS. RONAYNE:
 3 Q You don't know what person's car you're being driven
 4 in?
 5 MR. CAVELLIER: Asked and answered.
 6 MS. RONAYNE: That's fine, but he --
 7 he can still answer.
 8 THE WITNESS: Rental cars; that's what
 9 we get, rental SUVs, rental -- most of the time -- I
 10 mean when I'm up here all the time actually from what
 11 I know, so if I was driven in a car, I wasn't paying
 12 attention to that. It wasn't like oh, this is her
 13 car, because I usually -- we have our own rental
 14 things here.
 15 BY MS. RONAYNE:
 16 Q Have you ever been to Deborah -- Debbie Frazier's
 17 residence?
 18 A No.
 19 Q Do you know where she lives?
 20 A No.
 21 Q Do you know if any members of your staff or your
 22 flock, as it's been referred to today, do you know if
 23 any of them have been to Mrs. Frazier's residence?
 24 A Yes.
 25 Q And who was there?

1 A I don't know; I can't tell you.
 2 Q Somebody used flock today.
 3 MR. CAVELLIER: Not on the record.
 4 MS. RONAYNE: It doesn't matter; that
 5 was a term that was used.
 6 MR. CAVELLIER: Not that I heard.
 7 MS. RONAYNE: No, I -- I heard it. I
 8 took note of that. All right.
 9 BY MS. RONAYNE:
 10 Q So you know that there have been other staff or flock
 11 members --
 12 A We fellowship with each other, yeah.
 13 Q Okay. So tell me what you know about that.
 14 A That's all I know that --
 15 MR. JENKINS: Objection to foundation.
 16 MS. RONAYNE: Okay.
 17 BY MS. RONAYNE:
 18 Q What -- what do you know about that?
 19 A That's all I know, that --
 20 Q What -- what do you know; tell me what -- what --
 21 what does that mean?
 22 A That they --
 23 Q Fellowship with each other.
 24 A -- like a normal person meet up and they go out to
 25 eat or -- like with the -- the staff. I mean that's

1 all I know.

2 Q Well, I'm just talking about Mrs. Frazier's house,
3 and you said you were aware that staff members or --

4 A Have visited and been there, yes.

5 Q Okay. Have they spent the night, to your knowledge?

6 A I think they have. I mean from what I know, they
7 have spent the night, but I don't know the extent,
8 you know, I'm not into all --

9 Q Has Michelle spent the night there?

10 A Not that I know of. She usually stay in a hotel from
11 what I know.

12 Q When -- when she comes to Michigan?

13 A Mm-hmm.

14 Q You have to answer yes or no.

15 A Yes. Yes. Yes.

16 Q And you're saying you've never gone to Mrs. Frazier's
17 residence?

18 A No, I don't know where she stays.

19 Q Okay. Do you know who from the fellowship -- you
20 know, these fellowship gatherings, who specifically
21 has gone there?

22 A No, I can't say. I -- I really can't.

23 Q You don't know any of the names of the people that
24 have been on fellowship with her at her house?

25 A I think more my staff would know that information. I

1 members, whoever, if any of those folks have ever
2 spent the night at Mrs. Frazier's residence?

3 A Not that I know -- I don't know anybody personally.
4 I mean my staff would know more about that.

5 Q So you just don't have knowledge of that?

6 A No, I've never been to her house. I don't make it my
7 business to go to places like that; to be involved
8 personally.

9 Q What is your educational background?

10 A High school diploma, bachelor's degree --

11 Q Hold on, let's --

12 A Associate's/bachelor's --

13 Q Okay. High school from?

14 A South Side High School in Memphis, Tennessee.

15 Q South Side High School, Memphis, Tennessee?

16 A Yes, mm-hmm.

17 Q Is that where you grew up?

18 A Yes.

19 Q Okay. And next?

20 A And Johnson and Wells University culinary arts.

21 Q Hold on. Johnson --

22 A Johnson and Wells -- and Wells University culinary
23 arts.

24 Q And where was that?

25 A In South Carolina; a remote base.

1 just know -- I heard that people have, so --

2 Q What's your understanding of how many people would go
3 there to her house?

4 MR. JENKINS: Objection.

5 MS. RONAYNE: Pardon me?

6 THE WITNESS: Maybe one -- maybe one
7 or two --

8 BY MS. RONAYNE:

9 Q One or two?

10 A I -- I -- from what I know have visited. Have
11 visited.

12 Q I -- I'm sorry; I didn't hear you.

13 A Maybe one or two have visited or some --

14 Q Do you know on how many occasions?

15 THE COURT: Foundation; objection.

16 MR. CAVELLIER: Objection; he's asked
17 and answered these questions. He doesn't know.

18 THE WITNESS: I don't know.

19 MS. RONAYNE: No, he hasn't answered
20 it.

21 MR. JENKINS: He has no personal
22 knowledge.

23 BY MS. RONAYNE:

24 Q Do you know if anybody from your -- your ministry and
25 that who -- you know, volunteer, paid, board, flock

1 Q And what year was that?

2 A 1992, yeah. '92.

3 Q Were you --

4 A From '90, '91 until -- '90 -- from '90 to '92.

5 Q That's when you went to school there?

6 A Yeah.

7 Q Did you receive any kind of degree, certificate --

8 A Yes.

9 Q -- what would that be?

10 A Associate's degree in culinary arts.

11 Q And did you work in that capacity --

12 A Yes.

13 Q -- anywhere?

14 A Mm-hmm.

15 Q And where did you work?

16 A Just different restaurants as a -- as a chef, as a
17 cook.

18 Q And how long did you work in that capacity?

19 A From about -- well, started before school, so --
20 before I graduated, so from the time I was 16 until
21 to '92 -- '91, something like that.

22 Q I thought you said you got your degree there in '92?
23 So you didn't work anymore in that industry after you
24 got your degree?

25 A Well, maybe a little, but that's when I went full-

1 time ministry, when I was 19 years old.
 2 Q And where did you go for full-time ministry?
 3 A Nowhere; I didn't go to school for full-time
 4 ministry. I just started doing ministry full-time.
 5 Q Okay. What does that mean you started doing
 6 ministry; tell me what that means?
 7 A Well, I mean full-time means you give up your career
 8 to serve the Lord and to preach the gospel around the
 9 world.
 10 Q And --
 11 MS. RONAYNE: Okay. Could -- could we
 12 go off the record for a second?
 13 VIDEOGRAPHER: Off the record at 5:24.
 14 (WHEREUPON, a brief recess was taken
 15 from 5:27 p.m. to 5:37 p.m.)
 16 VIDEOGRAPHER: We are back on the
 17 record at 5:37.
 18 MS. RONAYNE: Continuing with
 19 questions.
 20 BY MS. RONAYNE:
 21 Q Who is Zoya (ph) -- I'm not sure if it's Garcia or
 22 Garica (ph)?
 23 A That was someone who worked for the ministry at one
 24 time.
 25 MR. CAVELLIER: Somebody who what?

1 THE WITNESS: No. What did you say?
 2 MS. RONAYNE: I -- I can't hear him
 3 because I keep hearing --
 4 THE WITNESS: I said no.
 5 MS. RONAYNE: Okay.
 6 MR. CAVELLIER: Because you keep
 7 getting objections.
 8 MS. RONAYNE: But he keeps talking, so
 9 I can't hear --
 10 MR. CAVELLIER: When I place an
 11 objection on the record, stop talking.
 12 THE WITNESS: I'm sorry.
 13 BY MS. RONAYNE:
 14 Q Do you pay child support to a Diana Dean or Diana --
 15 she might go by two different names -- Courchaine, if
 16 I'm pronouncing it right; C-o-u-r-c-h-a-i-n-e?
 17 A No.
 18 MR. CAVELLIER: Objection to
 19 relevance, prejudice.
 20 BY MS. RONAYNE:
 21 Q No?
 22 A No.
 23 Q Someone by the last name of Dorsey (indiscernible)
 24 Dorsey; do you know that person?
 25 A Yes.

1 THE WITNESS: Worked volunteer with
 2 the ministry.
 3 BY MS. RONAYNE:
 4 Q Does she -- is she still --
 5 A No.
 6 Q -- volunteering?
 7 A No, mm-mmm.
 8 Q For what time frame did she?
 9 A '11 to the beginning of this year or something like
 10 that.
 11 Q 2014?
 12 A Or the end of last year; yeah.
 13 Q Okay. Do you have a child with her?
 14 A No.
 15 Q No child with her?
 16 A No.
 17 Q Did you have a relationship with her that was
 18 physical, sexual?
 19 A No.
 20 MR. JENKINS: Objection, relevance.
 21 MS. RONAYNE: Okay. That's fine.
 22 BY MS. RONAYNE:
 23 Q You have no physical or sexual relationship with her?
 24 MR. CAVELLIER: And I'll add prejudice
 25 as well.

1 Q And who is that?
 2 A She worked in the ministry years ago.
 3 Q What time frame would you say?
 4 A In '07 -- I mean 1997 to 2003, something like that.
 5 Q Okay. Did -- did she buy you a Mercedes Benz?
 6 MR. JENKINS: Same objection.
 7 MR. CAVELLIER: Objection; relevance.
 8 MS. RONAYNE: Okay.
 9 BY MS. RONAYNE:
 10 Q Did she buy you -- you can still answer; did you buy
 11 -- did she buy you --
 12 MR. CAVELLIER: Go ahead and answer.
 13 THE WITNESS: No.
 14 BY MS. RONAYNE:
 15 Q Do you have a child with her?
 16 MR. JENKINS: Same objection.
 17 THE WITNESS: No.
 18 BY MS. RONAYNE:
 19 Q Have you ever had a physical or sexual relationship
 20 with her?
 21 MR. JENKINS: Objection --
 22 MR. CAVELLIER: Same objection.
 23 MS. RONAYNE: He can -- that's fine.
 24 MR. JENKINS: -- relevance, prejudice.
 25 MR. CAVELLIER: What is the point of

1 all these questions?
 2 MR. JENKINS: I mean that -- that --
 3 MS. RONAYNE: I can tell you later.
 4 MR. JENKINS: It's harassment.
 5 MS. RONAYNE: No, it's not.
 6 BY MS. RONAYNE:
 7 Q Have you -- have you ever had a physical or sexual
 8 relationship with Debbie Frazier?
 9 MR. JENKINS: Objection.
 10 MR. CAVELLIER: Objection.
 11 THE WITNESS: Can I answer?
 12 MR. CAVELLIER: Sure.
 13 THE WITNESS: Of course not.
 14 BY MS. RONAYNE:
 15 Q You refer to seeing Jesus face-to-face; is that true?
 16 A Yes.
 17 Q Okay. And what does that mean?
 18 MR. CAVELLIER: Same objection.
 19 THE WITNESS: Do I have to answer
 20 that?
 21 MR. CAVELLIER: Yep.
 22 THE WITNESS: I would love to answer
 23 that one. Well, I mean he appeared to me in a dream
 24 like he's done people in the Bible, and he changed my
 25 life.

1 BY MS. RONAYNE:
 2 Q And when was that?
 3 A When I was 17 years old.
 4 Q Okay. And has he appeared since?
 5 A Yes.
 6 Q And when would that be?
 7 A I can't tell you; it's just been different years,
 8 times.
 9 Q Can you give me an approximation of how many times
 10 you've seen Jesus face-to-face?
 11 A It's just --
 12 THE WITNESS: Do I need to answer
 13 that?
 14 MR. JENKINS: Same objection.
 15 MS. RONAYNE: You can still answer.
 16 THE WITNESS: Do -- do I need to?
 17 MR. CAVELLIER: Well, yeah --
 18 THE WITNESS: Well, it's just been
 19 more than once or twice, three times. It's been
 20 multiple times.
 21 MS. RONAYNE: Okay.
 22 BY MS. RONAYNE:
 23 Q Just as an approximation, because you said this
 24 started when you were 17.
 25 A Yeah. I'd just rather not answer by numbers, because

1 I -- I -- I -- I don't know actually.
 2 Q You don't know how many times you've seen Jesus?
 3 A I can't -- I can't put an exact time -- count.
 4 Q Did you write a book about this?
 5 A Mm-hmm. Yes.
 6 Q Okay. And did you say in the book that you had seen
 7 him 1,000 times?
 8 A No, I actually said I've seen him over 1,000 times.
 9 Q Over --
 10 A In a 20-year period.
 11 Q Okay.
 12 A So I don't know --
 13 Q So when we're saying once or twice, it's really more
 14 like over 1,000 times?
 15 A In the book, yes.
 16 Q You said that in the book?
 17 A That I've said that.
 18 Q Okay. But is -- is that true?
 19 A It is true.
 20 Q Your position is you have seen Jesus face-to-face
 21 over 1,000 times?
 22 A Yes.
 23 Q Okay. What does it mean to see him face-to-face?
 24 That's a term you use, isn't it?
 25 A Yes.

1 MR. JENKINS: Same objection.
 2 BY MS. RONAYNE:
 3 Q What -- what does that mean to you?
 4 A Well, I mean like you and I are seeing each other
 5 face-to-face right now. It's an appearance; the
 6 Bible calls it an appearance.
 7 Q So he physically appeared to you?
 8 A Mm-hmm.
 9 Q You have to answer out loud.
 10 A Yes.
 11 Q So you said when you were 17 he appeared in a dream.
 12 A Yes.
 13 Q You were asleep?
 14 A Yes.
 15 Q Okay. So are you counting that as a face-to-face
 16 appearance?
 17 A Yes. That's what the Bible calls it.
 18 Q Well, but you referred to you and I sitting here and
 19 that that was face-to-face, so I'm kind of confused
 20 by your answer if you mean while sleeping you may
 21 have had a dream about Jesus, or if actually you're
 22 saying that you -- like you and I are here --
 23 A Mm-hmm.
 24 Q -- you've seen him face-to-face.
 25 A Well, the Bible records he does it in both ways --

- 1 Q No, I'm asking you.
- 2 A That's what I'm telling you. That's what I'm telling
3 you.
- 4 Q I'm just asking your experience.
- 5 A I'm -- I'm telling you I -- I will not give you an
6 answer if you cut me off. Now, I'm telling you that
7 he has appeared to me in a dream; the Bible is clear
8 that he can do it in a dream or like he did to Paul,
9 physically on the road to Damascus. And I've had
10 both.
- 11 Q Okay. How many times would you say it was in a
12 dream?
- 13 MR. JENKINS: Same objection.
- 14 THE WITNESS: Many times.
- 15 BY MS. RONAYNE:
- 16 Q Many times in a dream?
- 17 A Yeah.
- 18 THE WITNESS: Should I answer?
- 19 MR. JENKINS: Yes.
- 20 MR. CAVELLIER: It's a standing
21 objection to relevance --
- 22 MS. RONAYNE: You know, I -- I take it
23 you're going to object to everything, so I'd just
24 note that. You don't have to --
- 25 MR. JENKINS: No, I'm -- I'm objecting

- 1 A In Port Huron.
- 2 Q In what church?
- 3 A A church called New Covenant.
- 4 Q And who was there with you?
- 5 A No one was there.
- 6 Q You were by yourself?
- 7 A I was there -- yes.
- 8 Q And what time of the day or evening was it?
- 9 A It was more toward the evening.
- 10 Q And you're in a church by yourself?
- 11 A Yes.
- 12 Q Were you giving crusades or anything yet?
- 13 A No.
- 14 Q What -- why were you there?
- 15 A Just praying and fasting.
- 16 Q How did you end up in Port Huron?
- 17 A Well, I have relationships up there with churches,
18 and that church is very close in our organization, so
19 --
- 20 Q So explained to me what happened on that occasion?
- 21 MR. JENKINS: Same objection.
- 22 THE WITNESS: Do I need to --
- 23 MR. CAVELLIER: Over the objection,
24 you have to answer the question to the best of your
25 ability.

- 1 to relevance and prejudice on this line of
2 questioning.
- 3 THE WITNESS: All right.
- 4 MS. RONAYNE: All right.
- 5 BY MS. RONAYNE:
- 6 Q So the -- the face-to-face where you have physically
7 had Jesus appear to you, not in a dreamlike state --
- 8 A Right.
- 9 Q But physically.
- 10 A Right.
- 11 Q When was the last time that happened?
- 12 MR. JENKINS: Same objection.
- 13 THE WITNESS: Should I --
- 14 MR. JENKINS: Yes.
- 15 MR. CAVELLIER: Yes, you're in the
16 middle of --
- 17 THE WITNESS: I think that the last
18 physical time was in 2011 or '10, where I was fasting
19 and praying at the church.
- 20 BY MS. RONAYNE:
- 21 Q And where -- where was that?
- 22 A Oh, it was in a church.
- 23 Q Right; where is that?
- 24 A Up north.
- 25 Q Up north --

- 1 THE WITNESS: Okay. He just appeared
2 to me like he did Paul on the road to Damascus, and
3 he told me what he wanted me to do.
- 4 BY MS. RONAYNE:
- 5 Q So he physically appeared to you like your attorney
6 is sitting across from you, the physical em --
7 embodiment of Jesus?
- 8 A Yes.
- 9 Q That's what you're saying?
- 10 A Yes.
- 11 Q Okay. And you are liking yourself like to Paul the
12 Apostle?
- 13 A Not liking myself, no. I -- I'm just saying those
14 experiences happened.
- 15 Q Well, you keep rep -- representing or referencing --
- 16 A I'm trying to give you a reference point so you can
17 understand what I'm saying.
- 18 Q Tell me what specifically in the Bible refers to
19 Jesus appearing face-to-face in a dream?
- 20 A Paul had night visions; although he saw the Lord
21 physically, he also -- the Lord appeared to him --
22 Solomon had an appearance with the Lord --
- 23 Q But can you -- can you give me a cite for it, like
24 where in the Bible? Not just the story, but exactly
25 where it is?

1 A Yeah, Solomon and First Kings 3:5 had a dream --
 2 appearance from the Lord -- well, that wasn't Jesus,
 3 that was the God, came to him in a dream and appeared
 4 to him and asked him what did he -- told him to ask
 5 what he wanted and he asked for wisdom which is a
 6 very known story. And that was in a dream, and he
 7 awoke and he became the wisest -- from an appearance
 8 in a dream.
 9 Q Okay. Any other cites you can give me about
 10 dreamlike states that are --
 11 A Abraham.
 12 Q -- he's visited in?
 13 A Abraham.
 14 Q That was a dream?
 15 A Yeah, he appeared --
 16 MR. CAVELLIER: Objection to
 17 relevance. What -- is this a test?
 18 MR. JENKINS: This is --
 19 MS. RONAYNE: I note -- I note your
 20 objection.
 21 MR. JENKINS: No, I'm -- I'm going to
 22 state an objection too. This is --
 23 MS. RONAYNE: That's fine.
 24 MR. JENKINS: -- you -- you are asking
 25 about a man's personal faith.

1 the --
 2 MR. JENKINS: (Indiscernible)
 3 MS. RONAYNE: -- let's -- let's be
 4 productive.
 5 MR. YATOOMA: I asked if you were
 6 making --
 7 MR. CAVELLIER: Your attendance here
 8 is a courtesy.
 9 MR. JENKINS: It's not --
 10 MR. YATOOMA: Thank you, gentlemen.
 11 MR. CAVELLIER: You're not permitted
 12 on the record.
 13 MS. RONAYNE: Well --
 14 MR. YATOOMA: Thank you.
 15 MS. RONAYNE: I want to use the time
 16 productively, and that was a pretty long-winded
 17 objection that went on beyond an objection. So let's
 18 go back.
 19 BY MS. RONAYNE:
 20 Q This -- you -- so you're saying Abraham saw Jesus
 21 face-to-face, but it was a dream?
 22 A He saw -- he had a visitation from God in a dream,
 23 and --
 24 Q Not Jesus.
 25 A -- saw Jesus face-to-face in the physical.

1 THE WITNESS: Yes.
 2 MR. JENKINS: You know, and his
 3 personal religion in a case that is dealing --
 4 started out as a parenting time issue and suspension
 5 of parenting time. To me this is an abuse of
 6 process.
 7 MS. RONAYNE: Okay.
 8 MR. JENKINS: It's not only an abuse
 9 of process, it's designed to utilize for an improper
 10 purpose a deposition, and -- and if there's ever --
 11 you know, a -- a case of where -- where somebody is
 12 crossing the line and utilizing the litigation
 13 process for ulterior motives, this is what's going on
 14 right how.
 15 MR. YATOOMA: Are -- are you
 16 testifying or objecting?
 17 MR. JENKINS: I'm objecting. I'm
 18 stating on the record. Do you have an appearance in
 19 this file?
 20 MR. YATOOMA: I do not.
 21 MR. JENKINS: Okay.
 22 MR. YATOOMA: I referenced who I was
 23 in the beginning.
 24 MR. JENKINS: I understand that.
 25 MS. RONAYNE: All right. So back to

1 Q Okay. And what is the biblical cite for that?
 2 A It's in Genesis; I -- I can't give you the exact
 3 chapter, but it's -- it was the chapter right before
 4 Sodom and Gomorrah.
 5 Q Is your ministry biblically-based?
 6 A Yeah, of course. I'm quoting scriptures --
 7 Q No --
 8 A I am.
 9 Q Well --
 10 A You just don't know the scriptures. If you knew the
 11 scriptures, you could -- you would know what I'm
 12 saying is in the Bible is true. You don't know them.
 13 Q You don't know what I know.
 14 A You couldn't; you -- you would tell me --
 15 Q You don't know what I know.
 16 A You couldn't --
 17 Q It's not for me to testify; it is for you.
 18 A Okay, that's fine.
 19 Q How many times would you say in the last year since -
 20 - I'm sorry, in -- in the year 2011, did you only see
 21 him that one time in -- up north -- Port Huron?
 22 MR. JENKINS: Same objection.
 23 THE WITNESS: Do I need to?
 24 MR. CAVELLIER: Asked and answered.
 25 He said the last time he saw him was in 2010 in Port

1 Huron at New Covenant Church in Port Huron while he
2 was fasting and praying.

3 MS. RONAYNE: It -- well, I'm just --
4 this is just -- that was a foundational question.

5 MR. CAVELLIER: That was the last
6 physical appearance.

7 BY MS. RONAYNE:

8 Q So that's the last time you saw him; what was the
9 last -- the time before that that you saw him?

10 MR. CAVELLIER: Same objection;
11 relevance --

12 MR. JENKINS: Same objection.

13 THE WITNESS: Do I need to --

14 MS. RONAYNE: Gentlemen, it's just
15 interrupting. I understand you're going to object to
16 every single thing I ask --

17 THE WITNESS: Do I need to answer?

18 MS. RONAYNE: -- so let's just keep
19 the flow going --

20 MR. JENKINS: Because the probative
21 value is substantially outweighed by the prejudicial
22 effect.

23 MS. RONAYNE: That -- that's fine. I
24 -- I get it; you're objecting to everything for every
25 reason you can think of. Let's just keep this going.

1 Q Okay. And what was that experience like?

2 A Well, he just basically appeared to me and showed me
3 something that he wanted me to say --

4 MR. FRAZIER: (Indiscernible)

5 MS. RONAYNE: I know.

6 THE WITNESS: -- to somebody.

7 MS. RONAYNE: I -- I'm sorry; I -- I
8 didn't hear what you said.

9 THE WITNESS: He basically appeared to
10 me to share what he wanted me to say to somebody.

11 MS. RONAYNE: Okay.

12 BY MS. RONAYNE:

13 Q Can you tell me what that is?

14 A It's private, it's priestly.

15 MR. JENKINS: And I'm going to object

16 --

17 THE WITNESS: It can't be priestly

18 when you have a dream. That's not -- there is no --

19 THE WITNESS: It is priestly.

20 MS. RONAYNE: -- there's no privilege

21 on --

22 THE WITNESS: You don't know --

23 MR. JENKINS: There's -- there's a
24 privilege on priests being required and -- and called
25 to testify about what they say to parishioners --

1 MR. JENKINS: No, we haven't been
2 objecting.

3 BY MS. RONAYNE:

4 Q When --

5 MR. JENKINS: Until now.

6 MS. RONAYNE: Raise a standing
7 objection, which is fine.

8 MR. CAVELLIER: I had a standing
9 objection.

10 BY MS. RONAYNE:

11 Q So when did you see Jesus face-to-face before the
12 Port Huron place?

13 A Before 2010, 2007.

14 Q And where was that?

15 A What do you mean what --

16 Q Where did you see Jesus?

17 A What city or --

18 Q Yeah.

19 A I was -- I was asleep in a dream.

20 Q So there was a dream?

21 A Yeah.

22 Q And where were you sleeping?

23 A In Saint Louis.

24 Q At -- at your res -- at your --

25 A Mm-hmm.

1 MS. RONAYNE: In a dream?

2 MR. JENKINS: No, he said --

3 MS. RONAYNE: I asked what he said in
4 a dream.

5 MR. JENKINS: This is real -- I'm --
6 I'm going to reinforce --

7 THE WITNESS: I can't tell you --

8 MR. JENKINS: -- my objection; I mean
9 this --

10 MS. RONAYNE: That's -- that's fine.

11 THE WITNESS: It's -- it's --

12 MS. RONAYNE: It's not proprietary.

13 THE WITNESS: Yes, it is.

14 MS. RONAYNE: No, it's not.

15 BY MS. RONAYNE:

16 Q I'm asking you what Jesus said to you in the dream?

17 A I can't tell you. It's for a person that I --

18 Q You --

19 A -- that's private.

20 Q You don't have to name the person or name them by a
21 first name and no other name.

22 A No, that's private, I -- I just --

23 Q Private between who?

24 A Under oath -- I'm -- I'm a priest so I can't --

25 Q You're a priest?

1 A Yes.
 2 Q Okay. Let's --
 3 MR. CAVELLIER: Objection; he's --
 4 he's claiming the privilege between clergy and
 5 parishioner.
 6 MS. RONAYNE: You're -- you're
 7 objecting to his term of calling himself a priest?
 8 MR. CAVELLIER: He's --
 9 (MULTIPLE SPEAKERS TALKING OVER)
 10 MR. CAVELLIER: He's not a Catholic --
 11 he's not a Catholic priest, but he's clergy.
 12 THE WITNESS: The Bible says --
 13 COURT REPORTER: I -- I cannot get
 14 everything. I can't --
 15 MR. CAVELLIER: He's a minister.
 16 MS. RONAYNE: Well -- well, let's go
 17 back to the culinary school.
 18 THE WITNESS: Okay.
 19 BY MS. RONAYNE:
 20 Q What educational endeavors did you have after the
 21 culinary school?
 22 A Say that again; I -- I'm --
 23 Q What other educational endeavors have you had since
 24 culinary school, which I think you said was in '90 to
 25 '92; where else did you go to school?

1 couldn't know that, because you don't read the Bible,
 2 you don't --
 3 MS. RONAYNE: Can you --
 4 THE WITNESS: -- you don't understand
 5 --
 6 MS. RONAYNE: Can you please have your
 7 --
 8 MR. CAVELLIER: We'll proceed with
 9 questions and answers.
 10 THE WITNESS: Okay.
 11 BY MS. RONAYNE:
 12 Q So you have no certificate saying that you're a
 13 minister?
 14 A Yes.
 15 Q What certificate?
 16 A I got -- I was licensed in my teenage years in the
 17 Baptist church and also in the Church of God and
 18 Christ, so I do have license and I also have a
 19 doctorate of divinity given to me by Life University,
 20 which is a very prestigious theological seminar --
 21 Q A doctorate of --
 22 A -- because of --
 23 Q Hold on. Let me see. A doctorate of divinity by?
 24 A Life --
 25 Q Life?

1 A Nowhere. I was -- I've just been full-time.
 2 Q So you have not had any theological training at all?
 3 A Oh, I have.
 4 Q Okay. So did you go to school somewhere?
 5 A Not to a university for that; I said under other
 6 pastors and leaders.
 7 Q Did you go to any certified --
 8 A No.
 9 Q -- school --
 10 A No.
 11 Q Seminary?
 12 A No.
 13 Q Theological institution?
 14 A No.
 15 Q So you have no credentials that are recognized --
 16 A Oh, I have credentials that are recognized.
 17 Q Let -- let me finish.
 18 A Mm-hmm.
 19 Q No credentials that are recognized that say you're a
 20 priest, which is what you said you were?
 21 A Not a Catholic priest. Not --
 22 Q I didn't say Catholic and neither did you. You said
 23 -- you referred to yourself as a priest --
 24 A Well, that's what the Bible call ministers of the New
 25 Testament, well we're a priest. You -- yeah, you

1 A -- University.
 2 Q And where is Life University?
 3 A It's in Texas.
 4 Q And did you attend that school?
 5 A No.
 6 Q So --
 7 A I got a honorary --
 8 Q Honorary, okay.
 9 A Yeah, from my years of experience in the --
 10 Q All right. So you ever attended Life University?
 11 A No.
 12 Q Okay. And you can't tell me any other theological
 13 institutions, seminary, or the like that you received
 14 a degree from?
 15 A Neither can Peter or the other apostles, but anyway -
 16 -
 17 Q I --
 18 A -- no, no.
 19 Q What? Neither did what?
 20 A Neither can Peter or the other apostles; they --
 21 Q Oh --
 22 A -- didn't go to theological school either. But I'm
 23 just saying --
 24 Q But we're talking about those back when Christ was --
 25 A Yes, because --

1 Q Oh --

2 A -- we know Paul went, so there was theological

3 schools back then, but Christ didn't necessarily take

4 his apostles through that --

5 Q When did you start calling yourself The Apostle?

6 A Oh, I don't think it's The Apostle; I don't say The

7 Apostle --

8 Q Mm-hmm.

9 A -- like you're trying to make it sound. It's just an

10 office, like a pastor.

11 Q It's an office?

12 A An evangelist, like a pastor, evangelist. Do you

13 read the Bible? I mean --

14 MS. RONAYNE: Do you want to correct

15 him on his interrogation of me?

16 THE WITNESS: I'm asking because I

17 mean you can't understand me if you don't have any

18 point of reference.

19 BY MS. RONAYNE:

20 Q So you're saying that there is an office that's

21 referred to as The Apos -- or as an apostle?

22 A Have you ever heard of a pastor? Are you familiar

23 with pastor, because an apostle is a pastor. I'm

24 trying to answer your question.

25 MS. RONAYNE: Could you please --

1 MR. CAVELLIER: It -- just proceed

2 with questions --

3 THE WITNESS: Okay.

4 MR. CAVELLIER: -- and answers.

5 THE WITNESS: Okay.

6 MR. CAVELLIER: And I'm going to

7 object to the form of your question. It's

8 argumentative.

9 THE WITNESS: Yes.

10 MR. CAVELLIER: He's trying to explain

11 that apostle is similar to pastor is similar to

12 minister is similar --

13 MS. RONAYNE: Well, I think you're

14 testifying, but that would be -- let -- let me get it

15 from your client.

16 MR. CAVELLIER: Well, you've asked him

17 several times --

18 THE WITNESS: You keep cutting me off.

19 MR. CAVELLIER: -- are you not getting

20 it?

21 THE WITNESS: Yeah.

22 MS. RONAYNE: Okay.

23 BY MS. RONAYNE:

24 Q Apostle --

25 MR. CAVELLIER: And now we're relying

1 on the internet for your questioning.

2 BY MS. RONAYNE:

3 Q Does Life University from which you got your honorary

4 doctorate, does that still exist?

5 A Yeah.

6 Q What year did you get this honorary doctorate?

7 A Actually, they just presented it to me this year.

8 Q 2014?

9 A Mm-hmm.

10 Q Do you have a copy of that?

11 A I can get a copy if that's what you need.

12 Q And you're sure it's called Life University?

13 A I could be off on the -- a few names --

14 Q The place that gave you an honorary doctorate you

15 can't recall the name?

16 A Yeah, that's human error. Human error.

17 Q All right. So you refer to yourself with what kinds

18 of titles besides apostle?

19 A An evangelist. I mean you can just drop the apostle,

20 just evangelist or pastor.

21 Q And what -- a pastor usually refers to a church --

22 A Mm-hmm.

23 Q -- that you -- over which you're a pastor; where

24 would that be?

25 A Well, I mean I shepherd leaders and other pastors, so

1 I train them.

2 Q But it -- if you look up pastor, it refers to being a

3 pastor over a church, a specific place.

4 A Yeah, so I would be more of a bishop or -- that's

5 what an apostle is, over churches.

6 Q So you're a bishop?

7 A Other leaders, yes.

8 Q Over other leaders.

9 A Yeah.

10 Q Who made you a bishop?

11 A Well, first of all, God did.

12 Q So that's through God; that's -- that's not through

13 any religious organization?

14 A Yes, I have many organizations; I acknowledged --

15 Q No, usually when somebody is a bishop --

16 A They go through a ceremony, I know.

17 Q There is a ceremony, there's a specific church or

18 religion or denomination --

19 A Yes.

20 Q -- are -- do any of those apply to you?

21 A Yes.

22 Q Okay. What denomination --

23 A The Church of God and Christ.

24 Q Church of God --

25 A And Christ.

1 Q And where is that?

2 A I mean it's the biggest Pentecostal like movement,
3 black Pentecostal --

4 Q And they're saying -- and you're saying they made you
5 a bishop?

6 A No, they --

7 Q Oh --

8 A -- acknowledge me as a bishop.

9 Q Okay. I'm not talking about who acknowledges you as
10 a bishop. I'm talking about is there anything other
11 than you decided to call yourself a bishop that made
12 you a bishop?

13 A Other than, you know, the Lord commissioned me to do
14 what I'm doing --

15 Q Okay. So the -- you and the Lord applied the name
16 bishop to you, but you don't have any other
17 recognized --

18 A Well, I -- I'd --

19 Q Let me finish.

20 A -- rather not use bishop.

21 Q Oh.

22 A Yeah.

23 Q I thought that you said that's what I should us.

24 A I go -- I go by more Apostle Taylor, so --

25 Q I thought you said drop the The Apostle? Now you're

1 A Yeah, thousands of ministers around the globe who go
2 by that title.

3 Q That go -- name one.

4 A Apostle John Eckhart.

5 Q And where is he from?

6 A In Chicago. There's so many of them.

7 Q So many -- and -- and they just decide to kind of
8 anoint themselves as apostle?

9 MR. CAVELLIER: Objection; you're
10 being argumentative and --

11 MS. RONAYNE: No, I'm not. I --

12 MR. CAVELLIER: And, you know, it's
13 time to wrap this up anyway, because we agreed --

14 THE WITNESS: You just don't
15 understand; she don't know.

16 MS. RONAYNE: You know, you -- can we
17 -- that -- that needs to stop, okay, like now.

18 MR. CAVELLIER: Well, it is, because -
19 -

20 MR. JENKINS: Because he explained --

21 MS. RONAYNE: It needs to stop with
22 him making --

23 MR. CAVELLIER: Then you --

24 MS. RONAYNE: -- commentary about me.

25 MR. CAVELLIER: -- stop arguing with

1 confusing me.

2 A Well, so you can understand, I'm trying to simplify
3 things for you.

4 Q Not really.

5 A But you -- you don't --

6 Q So -- but you -- you decided to call yourself
7 Apostle?

8 A No, I didn't.

9 Q Who did?

10 A The Lord did.

11 Q Okay. When did he say you should be The Apostle?

12 A The Apos -- you keep -- it's not like that. It's --
13 it's -- it's almost like you're saying -- you know,
14 the pastor or the -- it's not a the in front of it;
15 it's just an office that denotes a work.

16 Q An office?

17 A That denotes a work. Like a pastor, you know the
18 work of a pastor, the work of an evangelist denotes -
19 -

20 Q Do you know anybody that refers to themselves as
21 apostle?

22 A Yeah.

23 Q Who?

24 A Thousands of people around --

25 Q Thousands?

1 the deponent.

2 MS. RONAYNE: No, no, no, no. Please.

3 MR. CAVELLIER: Okay. Are we wrapping
4 this up, because --

5 MS. RONAYNE: No, I think we can go
6 two more minutes.

7 MR. CAVELLIER: Well, we agree that we
8 would --

9 MS. RONAYNE: I'm not going to --

10 MR. CAVELLIER: -- wrap up in time for
11 me --

12 MS. RONAYNE: Absolutely.

13 MR. CAVELLIER: -- to be where I need
14 to be --

15 MS. RONAYNE: At seven.

16 MR. CAVELLIER: -- at seven o'clock,
17 and I need to stop by my office --

18 MS. RONAYNE: And that's not --

19 MR. CAVELLIER: -- on the way, which
20 is just around the corner --

21 MS. RONAYNE: I'm not going to prevent
22 you from doing what you have to do at seven.

23 MR. CAVELLIER: Well, that means I
24 need to leave now; it's six o'clock.

25 MS. RONAYNE: Well, that's not what

1 you told me before today.
 2 MR. CAVELLIER: That's not what I told
 3 you before?
 4 MS. RONAYNE: No.
 5 MR. JENKINS: That's what he said in
 6 court.
 7 MS. RONAYNE: You said six-thirty.
 8 I'm not going to keep you to until six-thirty, but I
 9 --
 10 MR. CAVELLIER: Well, I can't make it
 11 to Fourteen and Mound and stop by my office --
 12 MS. RONAYNE: I don't know anything
 13 about your stopping at your office --
 14 MR. CAVELLIER: -- by six-thirty.
 15 MS. RONAYNE: -- that wasn't in any
 16 part of any equation that I had.
 17 MR. JENKINS: Just for the record, I
 18 heard him say six.
 19 MS. RONAYNE: Not to me. And not --
 20 MR. CAVELLIER: Yeah, I did to you in
 21 court this morning.
 22 BY MS. RONAYNE:
 23 Q Let me ask you --
 24 MR. JENKINS: Are -- are we wrapping
 25 this up or not?

1 A No.
 2 Q Do you know how much she's given you?
 3 A Yes.
 4 Q How much is it?
 5 A I think it's a million; a little over a million.
 6 Q And you never had any conversation with a -- a
 7 million dollar donor?
 8 A Other -- other -- yeah, other than she gave it and I
 9 was appreciative that she had such a generous offer.
 10 Q So you did have a conversation with her about it?
 11 A Yeah, I -- I thought you was referring to before?
 12 Q Okay.
 13 A You were saying before. The way you were talking was
 14 --
 15 Q Okay.
 16 A -- before.
 17 Q So you can clarify it.
 18 A Yeah, so yeah, after I found out she gave that, I
 19 wanted to thank her for her generous gift, just like
 20 others have given.
 21 Q And where was it that this conversation occurred?
 22 A At the church.
 23 Q What -- what --
 24 A Where everybody else is --
 25 Q What church are you talking about?

1 MS. RONAYNE: A couple minutes.
 2 BY MS. RONAYNE:
 3 Q Has Deborah Frazier ever given you any cash?
 4 A No.
 5 Q She's never handed you dollar bills in any form?
 6 A No.
 7 Q Has she handed you a check?
 8 A No.
 9 Q Never given you a check?
 10 A No. Everything goes into offering or like she's
 11 wired, but my hands don't touch the money.
 12 Q Oh, okay. Did you ever tell Debbie Frazier that
 13 Jesus appeared to you and told you that Debbie should
 14 be giving you money?
 15 A No.
 16 Q Did you ever reference your face-to-face appearances
 17 with Jesus or your -- your conversations with Jesus
 18 to tell Debbie that she needed to donate money --
 19 A No.
 20 Q -- or offerings?
 21 A No, I've never done that to anyone.
 22 Q You never had a conversation with Debbie Frazier
 23 about her gifting?
 24 A No.
 25 Q None?

1 A Taylor.
 2 Q So you had a conversation with Debbie at the Taylor
 3 church, thanking her for giving you money?
 4 A Yes. For giving the ministry money, not me. Not me.
 5 Q Has Debbie ever shared with you any of her visions
 6 that she has claimed to have?
 7 MR. CAVELLIER: Objection --
 8 MR. JENKINS: Foundation.
 9 MR. CAVELLIER: Well, not only that,
 10 but it's privileged.
 11 THE WITNESS: Okay.
 12 MS. RONAYNE: He's not a pastor. He
 13 has no credentials as a pastor. He's self-anointed;
 14 that does not come under any priest/penitent or
 15 pastor privilege.
 16 MR. CAVELLIER: All right.
 17 MR. JENKINS: I just -- for -- for the
 18 record, a pastor --
 19 MS. RONAYNE: It's not privileged.
 20 MR. JENKINS: -- there are different
 21 religious affiliations and to claim the privilege
 22 does not require a particular credential --
 23 THE WITNESS: That's right.
 24 MR. JENKINS: -- it requires that
 25 you're a minister or you're a -- a serving

1 evangelist.
 2 THE WITNESS: Exactly.
 3 MS. RONAYNE: It does not.
 4 MR. JENKINS: Well --
 5 THE WITNESS: It does.
 6 MR. JENKINS: -- my objection is
 7 noted.
 8 MS. RONAYNE: That's fine. You can
 9 still answer.
 10 MR. CAVELLIER: No, he can't. That's
 11 his privilege. You don't answer that question.
 12 THE WITNESS: Thank you.
 13 MS. RONAYNE: You're going to say it's
 14 privileged, all -- all his conversations with Debbie
 15 Frazier, because he's a pastor that he is -- that he
 16 has anointed himself as?
 17 MR. CAVELLIER: That particular
 18 question, yes.
 19 MS. RONAYNE: What particular
 20 question?
 21 MR. CAVELLIER: You want to repeat the
 22 question?
 23 MS. RONAYNE: You don't know what -- I
 24 asked him if Debbie had talked to him about her
 25 visions?

1 MR. CAVELLIER: Yes. And I objected
 2 based on privilege.
 3 MS. RONAYNE: And --
 4 MR. CAVELLIER: And I stand by that
 5 objection.
 6 MS. RONAYNE: And what is your -- and
 7 your privilege is?
 8 MR. CAVELLIER: He's a pastor. He's
 9 speaking to his parishioner.
 10 MS. RONAYNE: His parishioner? Debbie
 11 is his --
 12 MR. CAVELLIER: Member.
 13 MS. RONAYNE: -- parishioner?
 14 MR. CAVELLIER: Parishioner, member,
 15 yes. You have the objection. He's been instructed.
 16 MS. RONAYNE: I -- I don't see any
 17 credentials that he's been able to provide me in this
 18 deposition that he is an actual pastor. He's never
 19 been to any theological school, no certification --
 20 MR. CAVELLIER: And now you're arguing
 21 with me. I've --
 22 MS. RONAYNE: I am.
 23 MR. CAVELLIER: -- already instructed
 24 the client.
 25 MS. RONAYNE: Okay. Then I'll

1 probably have to take that one to the court.
 2 MR. CAVELLIER: Okay.
 3 MS. RONAYNE: Reconvene January 9th at
 4 ten.
 5 MR. CAVELLIER: Correct. Yes.
 6 VIDEOGRAPHER: This completes the
 7 deposition for today. We are going off the record at
 8 6:05 p.m.
 9 (WHEREUPON, the deposition was
 10 concluded at 6:05 p.m.)
 11 * * * * *

1 STATE OF MICHIGAN)
 2) SS
 3 COUNTY OF OAKLAND)
 4
 5 C E R T I F I C A T E
 6
 7
 8 I hereby certify that this transcript,
 9 consisting of one hundred ninety-three (193) pages,
 10 is a complete, true, and correct record of the
 11 testimony of DAVID E. TAYLOR, held in this case on
 12 Tuesday, November 12, 2014.
 13 I also certify that prior to taking
 14 this deposition, DAVID E. TAYLOR was duly sworn to
 15 tell the truth.
 16 I also certify that I am not a
 17 relative of, employee of, or an attorney for a party;
 18 nor am I financially interested in the action.
 19
 20
 21 Deanna L. Harrison, CER 7464
 22 Certified Electronic Reporter
 23 3133 Union Lake Road
 24 Commerce Twp., Michigan 48382
 25 (248)360-2145
 Dated: November 21, 2014

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