

its money will be spent, leaving the day-to-day implementation and administration of those decisions to the executive officer like Mrs. Duff and support personnel.

d. Fourth, I want to say that it is my personal judgment that, at this time, NMTV should be a program affiliate of TBN. I believe that NMTV's broadcast of the wholesome gospel programming supplied by the TBN network, which addresses such pressing issues as endorsing family values and keeping the family together, promoting abstention from drug and alcohol abuse, encouraging inter-racial harmony, and advocating living a life based on morality and integrity, is one of the most important counterpoints that exists to the strife and crime that permeate many minority communities in which the need for such information and guidance is great. To be sure, NMTV, with the unique impetus and direction provided by its minority-controlled Board, should continue to develop and expand its own program outreach to the minority community. But, in conjunction with that programming, the TBN network affiliation is also a very important service to the minority community that NMTV provides.

e. Finally, I believe deeply in NMTV's purposes to further the cause of minority involvement in the world of television and to provide programming to benefit minorities. From the time Mrs. Duff first described the company to me the year it was formed I have felt that, because the interests of the minority community were at stake, I could contribute as a

minority with intelligent input to help the company fulfill those purposes. I am committed to help NMTV pursue those objectives to the best of its ability while this serious litigation before the FCC is proceeding. Further, once this litigation is resolved, my intention will be for NMTV to expand its ownership of stations so that the causes of minority ownership and service to minorities may grow beyond what NMTV has already accomplished.

12. To my knowledge, NMTV has proceeded in good faith to comply with the FCC's requirements as NMTV has understood them. I know that I have not purposely violated any FCC requirement, and I am unaware that any NMTV Director has done so. If NMTV has been doing something wrong, I would ask that the FCC tell us specifically what should be changed. We want to be law abiding, and we want to serve our people, and if the FCC gives us clear guidance about something we must do to be able to do both, I will use my full efforts to comply with that guidance.

SUPPORTING DECLARATION

I, Armando Ramirez, hereby swear under penalty of perjury that my foregoing testimony is true and accurate to the best of my knowledge and belief.

Executed this 2nd day of November, 1993.


Armando Ramirez

TESTIMONY OF PAUL F. CROUCH

1. My name is Paul F. Crouch. I reside at 1973 Port Chelsea Place, Newport Beach, California 92660. I am a citizen of the United States, and President and Director of Trinity Broadcasting of Florida, Inc. ("TBF"), Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network ("TBN"), and National Minority TV, Inc. ("NMTV").

2. I am submitting this testimony to address issues that the Federal Communications Commission ("FCC") has designated to determine whether TBN, its affiliates or I exercised de facto control over NMTV; and whether NMTV, TBN, its affiliates or principals, or I abused the FCC processes when NMTV claimed in applications for low and full power television stations that NMTV is controlled by minorities.

3. For the sake of clarity, I would point out that NMTV was incorporated in 1980 under the name Translator TV, Inc. ("TTI"), and changed to its present name in 1987. In this testimony I will use "NMTV" to mean the company under both of its names, unless the specific context requires that I refer to "TTI." Also, because it is cumbersome to state repeatedly that TBN "and its affiliates or principals" do not control NMTV, when I refer to "TBN" in the context of control of NMTV, I mean TBN and its affiliates or principals.

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4. NMTV was formed in 1980 at my initiative. The background leading to the formation of NMTV is set forth in the following paragraphs.

5. I was born on March 30, 1934, in St. Joseph, Missouri. I graduated from the Central Bible Institute in Springfield, Missouri, in 1955 with a degree in Theology. I have received three honorary doctorate degrees in Theology, Letters and Law: from the California Graduate School of Theology, Glendale, California, which awarded me a Doctor of Letters in 1981; from the American Christian Theological Seminary, Anaheim, California, which awarded me a Doctor of Divinity in 1983; and from Oral Roberts University, Tulsa, Oklahoma, which awarded me a Doctor of Laws degree in 1985.

6. While in theology school I helped build an educational AM station on campus, KCBI. In 1957 I became a radio announcer at KRSD(AM), Rapid City, South Dakota. A few years later I became program director of KRSD(AM) and finally program director of KRSD-TV, Channel 7, the NBC affiliate in Rapid City. In 1961 I was appointed by the General Council of the Assemblies of God to organize and operate a newly formed Department of Television and Film Production in Burbank, California. I held that position until 1965, and was responsible for the ongoing production of approximately 50 film productions focusing largely on foreign missions and foreign missionary works, as well as the

Assemblies of God's large inventory of audiovisual materials and children's teaching aids.

7. In 1965 I became General Manager of KREL(AM), Corona, California, and in 1966 purchased a minority stock interest in KREL Radio. In 1970 I left KREL and was invited to serve as General Manager at KHOF-FM and KHOF-TV, Channel 30, San Bernardino, California. In 1973 I left KHOF-TV and founded the Trinity Broadcasting Network, Inc.

8. To place the formation of NMTV and my involvement in that company in perspective, the history of TBN is pertinent. TBN was incorporated on August 2, 1973, as a nonprofit, nonstock California corporation. It is recognized as a tax-exempt public charity by the Internal Revenue Service, and is publicly supported. All of its assets and holdings are irrevocably dedicated for charitable purposes, not for private gain. As shown in Tab A to this testimony, the November 2, 1993 issue of The Chronicle of Philanthropy rates TBN as the 131st (out of 400) largest public charity in the United States. Thus, over its 20-year history TBN has become a very visible and very successful charity. We have accomplished that by using our best efforts to comply with all of the various legal requirements that apply to a nonprofit, tax-exempt, federally regulated company of this magnitude. We retain and rely on professional experts to guide us to maintain our public and legal good standing. I must state that, to me, the idea that TBN or I

would deliberately violate the law to obtain some preferences in lotteries for low power stations and the right to purchase a full power station in Odessa, Texas, or other places is unthinkable.

9. TBN acquired its first broadcast facility, KLXA-TV, Fontana, California, in August 1974. KLXA-TV later changed its call sign to KTBN-TV and moved to its current community of license, Santa Ana, California. From 1974 through 1980 TBN grew at a steady pace, and by the end of 1980 TBN and its associated owned-and-operated companies held three authorizations for full power stations and eleven for television translators. Today TBN and its associated owned-and-operated companies hold 11 full power commercial television licenses,^{1/} 160 television translator licenses, and 32 television translator permits, as well as a satellite cable television program service.

10. In the 1980s TBN also grew into the international market. TBN currently has an interest in, and/or provides programming to, broadcast facilities in the following foreign countries: Bolivia; Costa Rica; El Salvador; South Africa; Honduras; Nicaragua; Haiti; Zambia; Swaziland; Namibia; Lesotho; Zaire; Republic of China; Grenada; Greece; Switzerland; Italy;

^{1/} Those stations are: **KPAZ-TV**, Phoenix, Arizona; **KTBN-TV**, Santa Ana, California; **WDLI-TV**, Canton, Ohio; **WHSB-TV**, Monroe, Georgia; **KTBO-TV**, Oklahoma City, Oklahoma; **KTBW-TV**, Tacoma, Washington; **WHFT-TV**, Miami, Florida; **WKOI-TV**, Richmond, Indiana; **WCLJ-TV**, Bloomington, Indiana; **WTBY-TV**, Poughkeepsie, New York; and **KDTX-TV**, Dallas, Texas.

Nevis, West Indies; St. Lucia, West Indies; Argentina; Iceland; the Philippines; the Kingdom of Tonga; New Zealand; Columbia; Belize; Uganda; Brazil; and Russia.

11. Today TBN is the largest electronic evangelical ministry in the United States, if not the world. TBN operates a 24-hour per day program service featuring a core of religious programming produced by TBN, plus programs produced by other ministries and a variety of denominations. TBN's programming also includes public affairs programming, human interest programming, health and exercise programming, and informational, educational, and instructional programming.^{2/} The Arbitron rating service ranks the TBN service as the most viewed religious programming service in the United States (Arbitron, May 1993).

12. TBN has received commendations and recognitions for exceptional service to the public, including acknowledgements from former Presidents Reagan and Bush and former Los Angeles Mayor Thomas Bradley. TBN has received over 50 "Angel Awards" from Religion In Media for programming excellence, as well as several "Golden Halo Awards." In 1981 the National Religious

^{2/} Among the religious denominations represented in TBN's programs are a wide variety of Protestant and Evangelical denominations, as well as Catholic, Seventh Day Adventist, and Messianic Jewish programs. The Protestant denominations represented include Baptists, Presbyterians, Lutherans, Assemblies of God, Episcopalians, Methodists, Pentecostal Holiness, Church of God, Dutch Reformed Church, and Nazarene, as well as nondenominational programming.

Broadcasters Association awarded TBN its "Broadcaster of the Year" award, followed in 1986 by its "Foreign Broadcaster of the Year" award.

13. In addition to its broadcast programming, TBN has made donations of broadcast-related equipment to a number of entities. For example, TBN has donated satellite television reception equipment to several state and federal prisons and to a number of hospitals, and it has donated more than \$2.5 million worth of broadcast transmission and production equipment to broadcast organizations in foreign countries.

14. My responsibilities at TBN are naturally time consuming. I spend on average three-and-a-half hours per day on the telephone on network business. I normally have meetings or conference calls several hours each day, and my wife and I have hosted, usually twice a week, the Praise the Lord program. This is a three-hour program between 7:00 and 10:00 p.m., Pacific time, on Tuesday and Thursday nights. Often my wife and I host the program an extra night during the week, but on average it is twice a week.

15. I also host and prepare a daily program to update viewers and supporters on the activities at the network. This program, Behind the Scenes, varies in length from 15 to 30 minutes, and it takes an hour-and-a-half or so every day to prepare. I also write the network newsletter, PTL, and this

takes me at least two days a month. My days are also filled with appointments regarding station relations, both domestic and foreign, and constant travel among all of the network stations, particularly, Dallas and Santa Ana. I also regularly travel to affiliate stations to help with local crusades or special events. I am also out of the country an average of 5-6 weeks a year on TBN business.

16. Perhaps my most important responsibility involves coordinating, planning, and hosting the network's telethon, which we call a "praise-a-thon," which is held twice a year for an entire week each time. My time commitment associated with the praise-a-thons consumes approximately a month each time. I also carry the responsibility in representing the network to the general public, and this calls for numerous public speaking engagements and participation in special events throughout the country.

17. My responsibilities as the President of TBN, including all of the activities noted above, consume virtually all of my time, and I routinely work 60-70 hours a week. While I participate in NMTV meetings, and am available when NMTV has need of me, NMTV is a very small part of my regular responsibilities. During many weeks I devote no time at all to NMTV matters, and rarely more than a half hour per week. Throughout the year I estimate that the total amount of time I spend on NMTV matters is less than 25 hours.

18. NMTV had its origins in a meeting I had with former FCC Chairman Richard Wiley on June 2, 1979, in Washington, D.C. I am able to give the exact date because the meeting made such an impression on me that, when it was over, during my flight home I wrote the following notation in my Bible diary:

"June 2, 1979 Returning from Washington, D.C. after meeting R. Wiley."

A copy of that diary entry is attached to this testimony at Tab B.

19. I was meeting with Mr. Wiley to discuss some aspects of TBN's legal representation, and we spent a great deal of time addressing many facets of the television and communications industry. Mr. Wiley impressed upon me very strongly that the emerging policy of the FCC was to foster the integration of minorities into broadcasting. He encouraged me to return to California and begin thinking of directions that TBN could take as our network grew to assist in the implementation of this emerging policy.

20. With this in mind, I returned to California and spoke with a number of people about integrating more minorities into the management of TBN. One of those I spoke with was Rev. Jerry Barnard. Rev. Barnard was the host of a program on TBN and was also Mrs. Jane Duff's former pastor. He mentioned Mrs. Duff to me and recommended her with high praise. He also remarked that

he believed she was already volunteering as a TBN prayer partner. I thought and prayed about Rev. Barnard's advice, and soon met with Mrs. Duff. I believed that she would be an excellent person to get involved in TBN's management. Therefore, I offered her both the position of Public Affairs Director and a position on TBN's Board.

21. When the FCC initiated its low power television rulemaking in 1980, I was aware that the FCC was proposing to include preferences for minorities. I conceived of the idea to organize a new company that would integrate minorities into broadcasting and further promote the emerging policy that Mr. Wiley spoke to me about. I pictured this company as primarily being engaged in acquiring and constructing low power and translator television stations, hence its original name, Translator TV, Inc. I felt that TTI would both help to implement the FCC's minority ownership policy and hopefully allow TBN to develop, as new affiliates, stations that TTI might acquire.

22. NMTV was incorporated in September 1980, and its original Board members were myself and two minorities, Mrs. Duff and Pastor David Espinoza. I knew Pastor Espinoza because he produced a program on one of our stations, and I was also aware of his leadership in the minority community in Southern California. Mrs. Duff was already learning the broadcasting

industry extremely well and I knew she would make a good Director.

23. For almost twenty years I have been acutely aware, based on personal experience, that California law makes it illegal for one nonprofit corporation to control another. In 1974, when TBN was in its infancy and was purchasing air time on the station it now owns in Santa Ana, it had no funds to buy or rent the television cameras and related equipment needed to produce its programs. TBN depended entirely upon another religious entity, Melodyland Christian Center ("Melodyland"), to lend such equipment to TBN. After a point, however, Melodyland insisted that in return for providing such assistance, Melodyland have veto power and control of all the affairs of TBN. We were deeply opposed to that, because we had strong philosophical disagreement with Melodyland on the future and direction of TBN. Nonetheless, we reluctantly signed a formal agreement submitting to control by Melodyland, because there was no other way to continue our broadcasts and we felt we had no choice. A short while later, however, our legal counsel, Norman Juggert, discovered after researching the matter that the agreement we had signed with Melodyland was illegal because under California law one nonprofit corporation may not control another. I was overjoyed when I learned that, because it meant that TBN could remain independent after all. This was such an important event in TBN's early history that I have never

forgotten it. Because of what that experience taught me, it has never been my thought that TBN could or should control, or ever has controlled, NMTV.

24. When TBN was incorporated, its original Bylaws provided that a Director could be removed from office "with or without cause by the vote of a majority of the Directors." A copy of that provision is attached at Tab C, page 4. At a Board of Directors meeting on November 28, 1979, the TBN Board amended the Bylaws to protect my role as the person who ran the network. The Bylaw amendment provided that I could not be removed as President and a Director except for specified acts of malfeasance, and that I had the right to contest any such allegations of malfeasance at a formal expulsion hearing. A copy of that provision is attached at Tab C, pages 8-9. When TBN changed its name to Trinity Christian Center of Santa Ana, Inc., in 1988, the Bylaws as amended at that time retained the provisions that require special procedures for my removal. (Tab C, page 26.) However, when NMTV was incorporated in September 1980, only ten months after the TBN Bylaws were changed to include formal expulsion procedures to protect my role, the NMTV Bylaws contained none of the expulsion procedures that TBN had instituted, and simply provided that I or any Director could be removed by a majority vote. A copy of NMTV's Bylaws and the removal provision for NMTV Directors is attached at Tab D, page 1. The fact is that, in establishing NMTV, I was

not remotely thinking in terms of TBN or myself controlling the corporation. As President and a Director, I expected to be involved in the corporation's affairs, but my understanding was that each Director was an individual member of the Board with the right to vote his or her own judgment. Everyone was expected to speak his or her mind.

25. In fact, that is exactly what happened. For example, in 1989 Mrs. Duff and Pastor Espinoza decided that NMTV should sell a construction permit that NMTV held for a low power station in the Houston, Texas, market. I wanted NMTV to build the station. I thought the station would have more value if a sale were made after it was built, and I was hopeful that NMTV would use the facility to broadcast TBN's two semi-annual fundraising praise-a-thons. However, Mrs. Duff felt that NMTV was too busy planning for the construction of the Portland, Oregon, facility which NMTV had just acquired, and with the recent start-up operation of its Odessa station. As a result, NMTV did not accept my proposal that the Houston station be built, and instead the permit was sold. A few months before that, Mrs. Duff and Pastor Espinoza decided NMTV should not sell the Odessa station, when I wanted to do so. Before that, they decided the Odessa station should be built, when I proposed that the construction permit instead be sold. TBN thus provided the financing and the station was built. We have had many Board meetings at which open discussion occurred. Minorities on the

Board proposed that NMTV hire a minority attorney, and Tyrone Brown was hired. The minorities on the Board of Directors have promoted sincere discussion about the initiatives the company is taking and should take to serve the minority community in Portland. I do not control anyone on NMTV's Board, and TBN does not either.

26. In approximately 1983 or 1984, FCC counsel Colby May informed me that the FCC had decided to award low power television authorizations through a lottery procedure in which applicants that were minority-owned would be awarded a preference. Based on the many years I have been involved with nonprofit corporations, it was my understanding then, and remains my understanding today, that the equivalent of ownership of a nonprofit corporation is its Board of Directors. In the context of nonprofit Boards, my understanding is that the concepts of ownership and control are synonymous. The Directors are the owners, and the Directors have control.

27. I am aware that, over the years, NMTV has filed applications for low power stations in which it has claimed minority preferences. I sincerely believe that those preferences were properly claimed. NMTV is controlled by its Board of Directors, and the majority of the Board of Directors are minorities.

28. In 1987 good friends of mine, David and Al Roever, approached me and explained that they had a construction permit for a station in Odessa but they were unable to build the station. Since their permit was due to expire, they were looking for someone to buy it. Although TBN at that time owned 12 stations, Colby May advised us that NMTV, being a minority-owned company, could acquire the Odessa permit. Mr. May advised that I could have what the FCC rule calls a "cognizable interest" in a minority-owned company that could acquire up to two more stations. He further counseled that he believed NMTV complied with the requirements of this rule because it was minority-owned by reason of the fact that the majority of the Board were minorities. The cognizable interest that I had in NMTV, President and Director, was disclosed on the face of NMTV's application.

29. I was not involved in preparing the application for the Odessa acquisition. I relied on Colby May and Jane Duff to take all necessary steps to complete the transaction and prepare the application for filing at the FCC. When I signed the application, I understood that both counsel and Mrs. Duff had reviewed it, and I did not notice what I have recently learned were errors in portions of the application. To the best of my knowledge, the errors were not intentional and occurred only because of oversight. I know that I had no intention to withhold or misstate any facts concerning the application.

30. I was not heavily involved in NMTV's decision to purchase the Portland permit. I believe that someone approached Jane Duff about the opportunity, and she then brought it to the attention of NMTV's Board. Because the Portland market was much larger than Odessa, I thought that building a station there would produce the levels of support for NMTV to enable it to survive. NMTV needed to become economically viable to fully realize its goal of becoming an independent minority broadcaster. I thought the Portland station could help fulfill this goal better than Odessa. In retrospect, I believe this was a correct decision, because finally NMTV is showing the ability to survive on its own, and the Portland station has been the major factor in that development.

31. When NMTV filed its application for the Portland station, it again submitted to the FCC that it was permissible for me to have a cognizable interest because the majority of the Board of Directors were minorities. I believed then, and I believe now, that NMTV's submission that it qualified as a minority company within the meaning of the FCC's rules was correct. I know it was made in good faith. The procedure that I followed in signing the Portland application was the same as in the case of Odessa; I relied on Mr. May and Mrs. Duff to complete the application correctly. I recently have learned that the Portland application carried forward the same errors

that the Odessa application had contained. I regret that those errors occurred. They were unintentional.

32. Two concepts had an impact on the relationship among TBN, me, and NMTV. The first concept is that TBN's approach toward NMTV was always to be contributory and donative, until NMTV could stand on its own. I understood that the FCC wanted established owners like TBN to be the sponsoring organizations for new minority companies who would have the chance to enter the broadcast industry. TBN therefore did not employ a straight, hard-line business approach toward NMTV, as we might have done toward another company that did not come within the ambit of this FCC policy. We made our engineering and administrative resources available to NMTV at no charge because we thought that was the right thing to do to help NMTV develop. The services were not intended as a means to exercise control over NMTV, and I do not believe they represented control. We did not worry about having a tight formal note, repayment schedule, or security for the advances that we made to NMTV, as we might have done with another party, even though such documents probably would have given TBN greater leverage concerning NMTV's operations if we wanted it. But we did not. TBN's relationship with NMTV was more informal and donative, because we understood the FCC wanted us to be the sponsoring organization to help the minority company succeed.

33. The second concept that is relevant to the relationship among TBN, me, and NMTV is my understanding of what a "cognizable interest" under the FCC rules means. At the time NMTV decided to purchase the Odessa construction permit, FCC counsel Colby May advised me that the FCC's policy was that, to encourage group owners to provide financing and expertise to help new minority-owned companies to enter the broadcast industry, parties who provided that help could have an active interest and role in the company. In fact, he said that not only would such an interest and role be allowable, they were encouraged in order that the minority-owned company would have available to it the expertise that was needed to succeed. I therefore thought that, by serving as President and a Director and providing the benefit of my experience, and by having TBN provide the assistance it provided, I was doing exactly what the FCC wanted me to do. I certainly was not trying to assert any illegal or hidden control. The fact that I was President and a Director of NMTV was recited in NMTV's various applications to the FCC, and FCC counsel knew of the assistance that TBN was providing to NMTV and approved of it.

34. In February 1987 I signed the documents that are attached at Tab E, which incorrectly describe Terrence Hickey as Secretary or a Director of NMTV. Mr. Hickey was actually Assistant Secretary rather than Secretary, and he has never been a Director of NMTV. I did not notice those errors when I signed

the documents. I first learned of them when I was preparing for my deposition in this FCC proceeding.

35. In 1992 TBN joined with NMTV in an effort to assist a company named Community Brace, Inc., to provide financing to projects in South Central Los Angeles. NMTV Director E.V. Hill was a principal of Community Brace. We attended meetings and worked hard to bring that assistance about. TBN loaned NMTV \$1 million and NMTV obtained a \$1.5 million line of credit for the benefit of Community Brace. We then learned that the project could not proceed in the manner in which it had been proposed. Specifically, we learned that the federal government would not match NMTV's financing immediately, as we had thought, but would only do so after NMTV's contribution had been consumed and Community Brace had established its viability, and that the project therefore would involve much more risk. TBN's counsel and professional tax accountant advised me that both TBN and NMTV would have legal exposure for breach of fiduciary obligations if they participated. Copies of the advice I received are attached at Tab F. As I have previously indicated, TBN relies on the advice of such experts to assure its good standing as a nonprofit public charity. Since NMTV also is a nonprofit public charity, it was subject to the same legal requirements. Mrs. Duff also did not think NMTV should participate, and therefore it did not do so.

36. Late in September or early in October, 1993, I was told by FCC counsel, Howard Topel, that Scott Morris had confirmed to him that errors had been made in the financial statements relating to TTI in the years 1980 to 1987 and also in the reports that TTI filed with the IRS for those years. Mr. Morris' firm, Goodrich, Goodyear & Hinds, has been the outside auditors for TBN and NMTV since 1990. I have since been advised that Mr. Morris has completed a study of the errors in which he found that between 1980 and 1987 TBN purchases of translator equipment were listed as expenditures by TTI, translator equipment purchased by TBN was listed as a TTI asset, TBN translator expenses were listed as TTI expenses, and TBN expenditures for equipment and expenses were booked as TBN advances to TTI.

37. This was erroneous accounting. I have been told that Mr. Morris' investigation found that this erroneous practice ended in February 1987, which was the time when NMTV became an active company, applied to acquire the Odessa station, and soon opened its first bank account. I have also been advised that the accounting errors were corrected by TBN's assumption of all of the TTI/NMTV assets and liabilities and that this was reflected in TBN's IRS filing for 1987 and NMTV's filing for 1988.

38. I had no knowledge of these accounting errors at the time they happened. I did not learn about them until Mr. Topel

told me about them this year. Although I reviewed each of the combined financial statements prepared by the outside accountants for 1981-1987 as they were presented to me, I have no recollection of ever focusing on a TTI column in those statements. I have recently looked again at the combined statement for the 17-month period ending December 31, 1981, and I note that combined revenues were more than \$22 million and combined expenses more than \$15 million. The TTI figures on that statement (revenues shown as \$31,000 and expenses as \$66,000) were minuscule compared to the other numbers in the report. That was still the situation four years later when the 1986 report, which I have recently reviewed again, showed combined revenues of almost \$39 million and expenses of \$9.1 million. For TTI, the 1986 report showed zero revenues and expenses of \$60,000.

39. I was in those years preoccupied with the substantial growth of the network and the large sums that were involved. I simply did not notice the TTI numbers. They had no impact on me. They were lost in the much larger numbers reflecting the network's growth. Until early 1987, TTI was an inactive company waiting for FCC action on its translator applications. The network, on the other hand, was extremely active, and my principal concern was with its growth.

40. I do have a recollection that we solicited funds for TTI, which was then a newly formed company, in the 1980