

1           A     Robbie Mickley handles the correspond -- the mail  
2 correspondence.

3           Q     For TBN?

4           A     For TBN.

5           Q     And finally Shirley Revell, R E V E L L?

6           A     I believe Shirley also answers telephone bureau  
7 responses.

8           Q     For TBN?

9           A     For TBN.

10          Q     Thank you. We can turn to Bureau Exhibit Number  
11 352. That's a letter from Colby May to you at TBN and NMTV  
12 dated May 13, 1991. My question for you, Mrs. Duff, is do you  
13 know why in this letter Mr. May is addressing the letter to  
14 you in both capacities, TBN and NMTV?

15          A     For convenience, I, I -- I, I'm not -- it wasn't  
16 something that I had specifically asked him to separate.

17          Q     We can turn to Bureau Exhibit Number 353. And this  
18 is a consolidated opposition to petition to deny and informal  
19 objections filed by Colby May on May 23, 1991. Can you turn  
20 to page 28, please. And that, that's the handwritten 28,  
21 which has a circle around it. It's a statement. At the top  
22 it says statement of Jane Duff.

23          A     Yes.

24          Q     Is that your signature?

25          A     Yes.

1 Q We can turn to Bureau Exhibit Number 354. Actually  
2 be -- before I move on, who asked or authorized Colby May to  
3 prepare the, that pleading which is Exhibit 353?

4 A I don't remem -- remember whether it was the board  
5 action or whether I just told him to -- he suggested that this  
6 is something that we should do and I just authorized him to do  
7 it. I, I don't have a recollection of specifically how that  
8 came about.

9 Q When you say board action, do you mean TBN's board  
10 or NMTV's board?

11 A NMTV's board.

12 Q But you don't know or you don't recall how the  
13 authorization was communicated to Mr. May?

14 A No, I don't.

15 Q All right. We can turn to Bureau Exhibit Number  
16 354. And that's a letter from Joe Dunne to Reverend Aguilar  
17 dated May 24, 1991. Have you ever seen this letter before?

18 A Yes.

19 Q When did you first see it?

20 A Probably at, at about the time that it was sent,  
21 since I was copied on it.

22 Q Now I notice -- at least the copy that I have does  
23 not have May and Dunne letterhead on it. And my question for  
24 you is was this an initial draft of a letter that was sent to  
25 Mr. Aguilar or was this letter actually send to Mr. Aguilar?

1           A     I understand it was sent to Mr. Aguilar. I don't  
2 have any --

3           Q     In, in the form that you see it?

4           A     I, I didn't see the form. This is the only thing  
5 that I saw, was the copy, so I, I wouldn't be able to answer  
6 your question.

7           Q     All right. If you notice, in the first paragraph,  
8 Mr. Dunne starts off in his letter: let me introduce myself,  
9 I and my partner, Colby May, represent NMTV in its dealings  
10 with the FCC. And my question for you is given the fact that  
11 Reverend Aguilar had joined the board, NMTV's board in August,  
12 1990, why is it in May, 1991, that NMTV's lawyers are first  
13 introducing themselves to Reverend Aguilar?

14          A     I don't know.

15          Q     Are you aware whether Reverend Aguilar knew who  
16 NMTV's lawyers were at that time?

17          A     I, I don't have a recollection of specifically  
18 discussing with him our attorneys.

19          Q     We can turn to Bureau Exhibit Number 355. And  
20 that's an ownership report, accompanied by a covering letter,  
21 dated June 14, 1991, from May and Dunne. On page three, is  
22 that your signature?

23          A     Yes.

24          Q     Now as I read down in the covering letter for this  
25 ownership report, there is, there is a discussion about

1 Reverend Aguilar's criminal conviction. And my question for  
2 you, Mrs. Duff, is do you recall any discussions with any  
3 other board members in the summer of 1991 about Reverend  
4 Aguilar's criminal conviction?

5 A I had a discussion with Mr. Crouch when we were  
6 trying to get the information in regarding the conviction, and  
7 in that regard, yes.

8 Q You mean the information that's contained on page  
9 nine --

10 A Right.

11 Q -- of this document?

12 A About obtaining the information so we can make the  
13 correction in our reports.

14 Q Was Reverend Aguilar's criminal conviction of any  
15 concern to you and Mr. Crouch?

16 A We were aware of the fact that Mr. Aguilar --  
17 Reverend Aguilar had a conversion during the time he was in,  
18 in, in jail, and -- but it had been so long ago, I think it,  
19 it wasn't really a concern to us because we knew that he was  
20 transformed, that this was no longer the individual that, you  
21 know, went to jail and he was changed. And this was a part of  
22 his testimony whenever he came on the program, and it was a  
23 well-known fact that because of his background, that he was  
24 able to reach the kind of people that, that most Christians  
25 could not reach. So it wasn't anything that really was a

1 concern to us, and it was, it was a method that he used to  
2 reach people that otherwise would not be reached. And so we  
3 didn't consider it as being a problem. However, at that time,  
4 we were thinking in terms of his conviction being so long ago  
5 that it wasn't something that we even thought was necessary to  
6 report to the Commission at the time that we added him to the  
7 board, because it had been so many years ago. And I didn't  
8 even know it was a felony. I mean that probably was because  
9 of my ignorance, but I didn't equate that, you know, him being  
10 in jail, being a felon, that he was a convicted felon.

11 Q Are you saying that, that you knew about his felony  
12 conviction at the time he joined NMTV's board?

13 A I knew that he had been in jail. I knew he was  
14 converted in jail. But I didn't think of that in, in  
15 connection with the felony and, you know, when I signed the,  
16 the report. I just didn't equate that with Phil as being a  
17 convicted felon and this was reportable, because it had been  
18 so long ago, and I just didn't equate that to, you know, to  
19 the need to report that.

20 Q Were you and Mr. Crouch concerned about his  
21 conviction to the extent of how it related to the FCC?

22 A Not until later, when Mr. May brought it to my  
23 attention.

24 Q What is it he told you?

25 A He told me that we should have reported it, and that

1 we needed to do it right away. And so that's what we did. I  
2 don't think it was in -- I'm not sure what year it was that we  
3 did it, but when it came to his attention, then he told us  
4 that we needed to report it right away. And we tried to get  
5 the information from Mr. -- from Reverend Aguilar, and I got  
6 the impression that he either didn't want to deal with it or  
7 didn't recognize the importance of it, or something, and so we  
8 had to go to the extreme means of getting the information.

9 Q And what extreme means are you referring to?

10 A We had -- we called a detective that I knew and  
11 asked him if he would get the information for us because we  
12 needed it right away in order to make this report to the FCC.

13 Q You can turn to Bureau Exhibit Number 356. That's a  
14 letter from you to Reverend Aguilar dated June 19, 1991. Mrs.  
15 Duff, did you routinely send letters to other directors  
16 informing them of up-coming meetings?

17 A Not routinely, no.

18 Q Before meetings, did you send other directors an  
19 agenda?

20 A No. I wasn't in the habit of sending an agenda, no.

21 Q In connection with this letter of June 19, 1991,  
22 you, you say we are planning to discuss some important items.  
23 Did you identify, at any time, for Mr. Aguilar what the items  
24 were that were going to be discussed?

25 A Well, I, I don't have a recollection of it, no.

1 Q In other words, therefore, Mr. Aguilar learned of  
2 what was going to go on at meetings when he showed up for the  
3 meeting itself?

4 A There might have been some mention on the telephone,  
5 but in this case I don't have a recollection of it as to  
6 specifics about the agenda.

7 Q Mrs. Duff, this is just a general question. During  
8 all the years that Reverend Espinoza was a board member, had  
9 he been sent any agendas of, of what would transpire at up-  
10 coming meetings?

11 A I don't, I don't believe so. I don't remember ever  
12 doing so.

13 Q We can turn to Bureau Exhibit Number 357. This is a  
14 letter from you to Jim McClellan in the Portland station, and  
15 the letter is dated June 25, 1991. Now will you notice in the  
16 last paragraph, Mrs. Duff, your -- you state to Mr. McClellan:  
17 if you need these tapes provided for you, please contact Randy  
18 Clark in our Production Department immediately. In June,  
19 1991, did NMTV have a Production Department?

20 A No, I was referring to TBN's Production Department.

21 Q And Randy Clark is a TBN employee?

22 A Yes.

23 Q We can turn to Bureau Exhibit Number 358. That's a  
24 special meeting of NMTV, held on June 27, 1991. Do you know  
25 who prepared these minutes, Mrs. Duff?

1           A     I believe they were prepared by Mr. Juggert.

2           Q     Is there any particular reason why Mr. Juggert is  
3 not identified as being present at this meeting?

4           A     Okay, he, he just took the minutes and I -- and he  
5 didn't really participate in the meetings.

6           Q     Are there any other individuals in addition to the  
7 directors and Mr. Juggert who attended this meeting, that we  
8 should know about?

9           A     I can't recall anybody else that was at the meeting  
10 other than the directors.

11          Q     And Mr. Juggert?

12          A     Yes.

13          Q     We can turn to Bureau Exhibit Number 359. That's a  
14 letter from you to Jim McClellan at the Portland station dated  
15 June 27, 1991. Why don't you take a moment to familiarize  
16 yourself with that letter. Mrs. Duff, I have a question for  
17 you at the last paragraph. It's the next to the last  
18 sentence. You state: please complete these forms and return  
19 them to Personnel via UPS next day air. My question is when  
20 you refer to Personnel, is that TBN's Personnel Office?

21          A     Yes.

22          Q     We can move on to Bureau Exhibit Number 360. That's  
23 a memo from Ben Miller to you, Mr. Sebastian, and Jim Planck  
24 dated July 12, 1991. And in the first sentence there's a  
25 reference to a problem at the Salt Lake City station. Is that

1 NMTV's Salt Lake City station?

2 A Yes.

3 Q What happened there that is the subject of this  
4 memo?

5 A The contractor, Planck, visited the site. There was  
6 a concern that there might not be a -- we, I think somebody  
7 called us and told us that the antenna was not oriented  
8 correctly, and when the contractor visited the site, he found  
9 that it wasn't correct and he did correct the situation. And  
10 because of the problem, Ben came up with the idea of having  
11 somebody physically go to -- systematically go to each one of  
12 NMTV's, as well as TBN's, facilities to make sure that they  
13 had been constructed correctly. And so that -- there was  
14 another policy implemented to make sure that everything was  
15 in, in compliance.

16 Q Can you turn to page two, the paragraph that begins:  
17 next I am going to recommend to Paul Crouch. It, it's really  
18 not necessary to read the entire paragraph. My, my question  
19 is was that position created, low-power service coordinator?

20 A Yes.

21 Q And who became TBN's low-power service coordinator?

22 A Tim Geist.

23 Q Is he still holding that position?

24 A Yes.

25 Q Does Mr. Geist perform activities on behalf of NMTV?

1           A     From time to time, as needed, yes. I would ask him  
2 to, to do that for me, yes. He's an expert.

3           Q     What exactly has he done for NMTV?

4           A     He visited a few of our sites. I'm, I can't  
5 remember which, exactly which ones, but he has, on occasion,  
6 visited some of the NMTV sites.

7           Q     What does he do when he visits the sites?

8           A     He would observe to make sure that the installation  
9 was done accor -- according to the license and to make sure  
10 that there weren't -- there wasn't any problem with the  
11 equipment, it was functioning properly, and to make sure that  
12 the lighting and the tower and that type of thing, just  
13 compliance, general compliance with the rules, and to make  
14 sure that the station was giving the best signal, and he would  
15 make a recommendation if he thought that we needed to modify  
16 to do a better job of serving the community or -- and he would  
17 make recommendations to me.

18          Q     Is he a salaried TBN employee?

19          A     Yes.

20          Q     Does he perform the duties for NMTV during his  
21 workday at NM -- at TBN?

22          A     Basically, yes.

23          Q     Is his salary at TBN affected in any way by the  
24 activities that he devotes to NMTV?

25          A     No.

1 Q Bureau Exhibit Number 361, please. This is an  
2 Engineering Department memo from Ben Miller to Paul Crouch  
3 regarding the Salt Lake City stations. The only question I  
4 have for you, Mrs. Duff, is did this memo from Ben Miller to  
5 Paul Crouch involve any NMTV matters?

6 A Well, he mentions in the first sentence that both  
7 the low-power and the short-wave, so I would think that that  
8 would definitely be NMTV, yes.

9 Q NMTV had the low-power?

10 A Yes.

11 Q T -- TBN had a, a short-wave station in Salt Lake  
12 City?

13 A Yes.

14 Q We can turn to Bureau Exhibit Number 362. This is a  
15 memo from Ben Miller to Paul Crouch dated July 21, 1991.  
16 Mrs. Duff, do you know why Ben Miller is, in this memo,  
17 writing to Paul Crouch on TBN memo -- on a TBN memo form?

18 A No.

19 Q This memo does involve an NMTV matter, doesn't it?

20 A Yes.

21 Q I have the same question for Bureau Exhibit Number  
22 363, or same questions. This memo involves an NMTV matter,  
23 doesn't it?

24 A Yes.

25 Q Do you know why Ben Miller is using a TBN form for

1 | this memo, rather than an NMTV form?

2 |       A     No.

3 |       Q     We can turn to Bureau Exhibit Number 364. That's an  
4 | independent auditor's report for NMTV dated July 23, 1991.  
5 | Same question as with an earlier audit report. Do you know  
6 | how Goodrich, Goodyear, and Heinz came to prepare this for  
7 | NMTV?

8 |       A     It was negotiated by the TBN accounting services  
9 | that were provided for NMTV.

10 |       Q     And I see from Bureau Exhibit Number 365 that the  
11 | same company prepared the same services for TBN?

12 |       A     Yes.

13 |       Q     Mrs. Duff, can you turn to Bureau Exhibit Number  
14 | 366. Do you happen to know why an -- there is an independent  
15 | auditor's report for TBN's North Carolina company?

16 |       A     No.

17 |       Q     You can turn to Bureau Exhibit Number 367. And  
18 | that's a special meeting of TBN, held on August 14, 1991. Did  
19 | you attend this meeting, Mrs. Duff?

20 |       A     I don't recall whether I was at this meeting or not.  
21 | I don't think I was.

22 |       Q     You can turn to Bureau Exhibit Number 368, which is  
23 | a secured promisory note dated August 23, 1991. Is that your  
24 | signature on page seven of this note?

25 |       A     Yes.

- 1 Q Did you negotiate this note on behalf of NMTV?
- 2 A Yes.
- 3 Q With whom did you negotiate?
- 4 A TBN's board.
- 5 Q I'm sorry, I didn't hear you.
- 6 A TBN's board.
- 7 Q You negotiated with the entire board?
- 8 A With Paul Crouch and Norm Juggert.
- 9 Q Did you negotiate it separately with Paul Crouch and  
10 then with Mr. Juggert, or vice versa?
- 11 A No, I think we discussed it together.
- 12 Q Was Mr. Juggert attending the negotiations as lawyer  
13 or as board member of TBN?
- 14 A Well, he was a lawyer and a board member of TBN, so  
15 how can you separate.
- 16 Q Well, was Mr. Juggert representing NMTV?
- 17 A I believe that the, the negot -- the negotiations  
18 were fairly simple and this was sort of a boiler plate  
19 contract, and there wasn't really a lot of negotiating. It  
20 was really simple.
- 21 Q Who, who prepared this note?
- 22 A This was a pretty boiler plate document that Norm  
23 provided.
- 24 Q Well, how long were the negotiations?
- 25 A There were other short -- that, it wasn't -- it was

1 pretty much deciding what the terms of the, the note would be,  
2 but this was something that he had in his word processor, it  
3 wasn't just something that he tooled out specially for this.  
4 It was a fairly simple.

5 Q So, in other words, Mr. Juggert brought this form  
6 already filled out to the meeting and you essentially signed  
7 it right there?

8 A I had been accustomed to seeing this, you know, this  
9 type of secured promisory note. In fact, I might have even  
10 had a blank one in my, in my files, I'm not sure, but --

11 Q Is this the first note that NMTV entered into with  
12 TBN?

13 A I believe this is the first formal note, yes.

14 Q And why did you enter into it in August of 1991?

15 A In preparation for the purchase of the station in  
16 Wilmington.

17 Q Did the petition to deny that had been filed  
18 regarding the Wilmington station have any bearing at all on  
19 your signing this note with TBN?

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

21 Q We can turn to Bureau Exhibit Number 369, and that's  
22 an action by unanimous written consent. Mrs. Duff, am I  
23 correct in that this action by unanimous written consent  
24 allowed you to enter into the secured promisory note?

25 A Yes.

1 Q I'm curious about something. Am I correct that it  
2 takes two board members to resolve a particular matter at  
3 NMTV?

4 A I don't --

5 Q In other words, it takes a vote of two, two  
6 directors to pass an action?

7 A Yes.

8 Q Now on this action by unanimous written consent,  
9 would I be correct in assuming then that your authority to  
10 enter into the note did not become official until the second  
11 individual had signed it, and that would be on August 26,  
12 1991?

13 A Well, I guess you could say that.

14 Q Well, I'm asking you.

15 A I hadn't even thought about it. I guess if you  
16 would con -- it -- the letter of the law, I would think that  
17 if there were only two signatures on it, actually it would be,  
18 it would be effective, because at least you have, you have a  
19 majority that didn't require three signatures.

20 Q And that it would become effective when the second  
21 person signed it.

22 A Right.

23 Q So that would have been August 26, 1991?

24 A Right.

25 Q My question for you is, and hopefully you can clear

1 this up for me, is the, the date of the secured promisory note  
2 is August 23, 1991, but it would appear from our discussion  
3 just a moment ago that you didn't have the authority to enter  
4 into that until August 26, 1991. Am, am I correct in, in, in  
5 that assumption?

6 A Well, I am sure we had a consensus, even though it  
7 wasn't formally signed, because Mr. Aguilar was aware of what  
8 we were doing and it was just a matter, a formality actually  
9 getting the signatures.

10 Q Well, he signed the same day as you did.

11 A Right. So it --

12 Q And it only took two.

13 A Right. But it, it wasn't a matter of having to get  
14 the decision, the decision was already made. It was just a  
15 matter of putting the signatures on.

16 Q Is that generally how business was carried out at  
17 NMTV?

18 A Well, the person that signed the, the consent of the  
19 assignment knows about the action at the time that we, we  
20 consider the action, because there is usually a phone call,  
21 and they know what's coming. It's just a matter of, of  
22 actually getting the signature on the, on the document.

23 Q We can turn to Bureau Exhibit Number 370. And  
24 that's the memo from Ben Miller to Jim Planck. And I'd like  
25 to specifically direct your attention to the next to the last

1 sentence -- or strike that. I'd like to direct your attention  
2 to the last two sentences of the first paragraph. Have you  
3 ever seen this memo before?

4 A No, not -- I don't remember seeing it before.

5 Q We can turn to Bureau Exhibit Number 371. This is  
6 a, a memo from Mr. Miller to Dan Slape, S L A P E, at station  
7 WTGI TV. Is that the Wilmington station?

8 A Yes.

9 Q How did NMTV come to retain Mr. Miller to visit the  
10 Wilmington station?

11 A I don't remember whether I did -- I asked him to or  
12 whether Mr. Crouch did.

13 Q Was there any special agreement with Mr. Miller for  
14 his trip?

15 A No, just that we would pay his expenses.

16 Q We meaning?

17 A NMTV.

18 Q Whether you would continue to receive the salary  
19 from TBN?

20 A Yes, sir.

21 Q Can we turn to Bureau Exhibit Number 373. This is a  
22 special meeting of TBN on September 9, 1991. Did you attend  
23 this meeting, Mrs. Duff?

24 A I don't believe I did.

25 Q Do you have any knowledge as to what that additional

1 \$50,000 is that's reference in this, in, in the minutes here?

2 And that's the next to the last paragraph.

3 A No, I couldn't be absolutely sure.

4 Q Do you recall NMTV requesting an additional \$50,000  
5 from TBN?

6 A Yes. We needed more money for the studio  
7 remodeling.

8 Q For which station?

9 A For the Portland station.

10 Q Was, was there a note for this additional \$50,000?

11 A No, I believe there was a separate note, but there  
12 was always a record kept on the books, and then it was  
13 eventually reduced to a note.

14 Q When was that?

15 A The last one that -- which was actually the  
16 \$5,000,000 note.

17 Q January, 1993?

18 A Yes.

19 Q We can turn to Bureau Exhibit Number 374. Have you  
20 ever seen this letter from the FCC before?

21 A I'm sure I have.

22 Q Do you recall seeing it at about the time it was  
23 sent to Colby May?

24 A Yes.

25 Q Do you recall any discussions with Colby May about

1 it?

2 A Yes.

3 Q Can you relate to, to the Court the substance of  
4 your discussions?

5 A I would just -- I would need to review this for, you  
6 know, because it's been such a long time.

7 Q Take your time.

8 (Off the record.)

9 (Back on the record.)

10 Q Have you examined that document?

11 A Yes. I briefly looked over it. And, and your  
12 question against was?

13 Q Can you relate to the Court the substance of your  
14 discussions with Colby May about this letter?

15 A This was a response from Ms. Christman (phonetic  
16 sp.) in request to -- as a response to our request for a  
17 declaratory ruling, ruling in the matter of our attempting to  
18 acquire station WTGI.

19 Q Mrs. Duff, can I interrupt for a moment?

20 A Yes.

21 Q I, I believe you may be mistaken as to the, the  
22 nature of this letter. Could you pay close attention to the  
23 first paragraph.

24 A Then this was in respect to our application.

25 Q Not to the request for declaratory ruling.

1           A     Okay. Okay. That was later. This is regarding our  
2 seeking the license for WTGI.

3           Q     If you need some time to put yourself in a, in a  
4 proper time frame, take all the time you need.

5           A     It's 1991. Because I, I can't read the date very  
6 well. At the top, it's stamped.

7           Q     September, 1991, is what I can --

8           A     Sep -- '91, okay.

9           Q     -- I can tell. Which one is it.

10           JUDGE CHACHKIN: Was there a response from the  
11 Bureau?

12           MR. SCHONMAN: No, I think Mrs. Duff is still  
13 looking through the letter to determine the, the substance of  
14 her discussions with Mr. May.

15           JUDGE CHACHKIN: I understand. But was there a  
16 response to the Bureau's request?

17           MR. COHEN: Yes, there was, Your Honor.

18           MR. SCHONMAN: Yes.

19           JUDGE CHACHKIN: But you want her to orally recall  
20 -- to recall what she orally discussed with Mr. May, is that  
21 what you want to do?

22           MRS. DUFF: Yes.

23           MR. SCHONMAN: If she can recall.

24           MRS. DUFF: There is a lot of material in the  
25 letter. I'm sure we had a very extensive discussion, and a

1 lot of the, the letter requested our responses and answers to  
2 many questions. And but I don't --

3 JUDGE CHACHKIN: It would seem to me, Mr. Schonman,  
4 if you want her to answer -- give you an answer, you would  
5 have to direct it to a specific request, then ask her what, if  
6 anything, she recalls discussing with Mr. May concerning this  
7 particular subject. But ask for a general discussion that she  
8 had with Mr. May involving many, many subjects, I would think  
9 it would be impossible for someone to answer. If you want to  
10 ask her about any specific subjects, that the letter from  
11 Ms. Christman said so-and-so, what if anything did you discuss  
12 with Mr. May, Mr. May concerning this subject, but generally I  
13 don't see how anybody could answer a question like that.

14 MR. SCHONMAN: Okay. Your Honor, I'm just going to  
15 move on.

16 JUDGE CHACHKIN: All right. We'll take a ten minute  
17 recess at this time.

18 (Whereupon a recess was taken from 10:55 a.m. to  
19 11:10 a.m.)

20 JUDGE CHACHKIN: Let's go back on the record.  
21 Mr. Schonman?

22 BY MR. SCHONMAN:

23 Q Mrs. Duff, can we turn to Bureau Exhibit Number 375,  
24 please. That's a Form 990 for the year 1990. And on page  
25 five there is a signature by, it looks like Alan Brown.

1 A Yes.

2 Q What was Alan Brown's connection, if any, with TBN?

3 A He was the Director of Finance.

4 Q At the time he signed this?

5 A Yes.

6 Q Was, was he assistant secretary of NMTV as well?

7 A I believe he was at this particular time. The  
8 record will bear it out. I, I have a problem sometimes with,  
9 with dates and --

10 Q We can turn to Bureau Exhibit Number 377, which is a  
11 special meeting of NMTV on, on October 2, 1991. And this is  
12 the meeting when Reverend Hill was added to NMTV's board,  
13 correct?

14 A Yes.

15 Q He would have made the fourth director?

16 A Yes.

17 Q Why was Reverend Hill added to NMTV's board at this  
18 time?

19 A At that time, I believe that we had received a  
20 letter from Joe Dunne and this was -- Reverend Hill would have  
21 added a, a dimension to the board that we thought was  
22 necessary at that particular time.

23 JUDGE CHACKIN: Well, what, what was there about  
24 Mr. Dunne's advice that -- from which you concluded it was  
25 necessary you had to --

1 MRS. DUFF: Pastor Aguilar was having some problems  
2 with -- in his own ministry, and he had gotten involved in  
3 some things that took his -- a lot of his attention. And we  
4 thought that Reverend Hill would have added a dimension to the  
5 board, at that particular time, that we felt was necessary.

6 BY MR. SCHONMAN:

7 Q At the time that Reverend Hill was added to the  
8 board, were you and, and Reverend Crouch becoming  
9 disillusioned with Reverend Aguilar's participation on NMTV's  
10 board?

11 A Well, as I mentioned before, his attentions were  
12 drawn away because of the problems that he had encountered in  
13 his own ministry, and he, he just was not available as much,  
14 and he did have a lot of problems. A lot of things were going  
15 on with his ministry that were really taking his attention at  
16 that time.

17 Q Was he becoming an embarrassment to -- for you and  
18 Reverend Crouch?

19 A There were a lot of newspaper articles and things of  
20 that nature. It was embarrassing.

21 Q If you turn to the second page of Bureau Exhibit  
22 Number 377, that appears to be a copy of page one, but the  
23 version on page two contains some handwritten notations. Do  
24 you see that?

25 A Yes.

1 Q Are those initials Paul F. Crouch?

2 A yes.

3 Q And it indicates that -- he appears to state: I  
4 have no corrections or additions, be sure Colby gets a copy of  
5 this. Was it routine practice to send Colby May copies of  
6 NMTV's minutes?

7 A Well, in this regard, there was the addition of a, a  
8 board member for NMTV, and it was in that context that  
9 Mr. Crouch was wanting to make sure that I remind -- reminded  
10 Colby that we did have an addition to the board.

11 Q So it was not routine practice to send Colby copies  
12 of minute -- of NMTV minutes?

13 A No.

14 Q Mrs. Duff, we can turn to Bureau Exhibit Number 378,  
15 which is a memo from Ben Miller to Alice Fields regarding  
16 Mr. Miller's various titles. Now who again is Alice Fields?

17 A His secretary, at that time.

18 Q Have you ever seen this memo before?

19 A Just in reviewing the documents during the time of  
20 production, and with the -- Mr. Topel going -- reviewing  
21 documents.

22 Q So you did not see it on or about October 3, 1991?

23 A No.

24 Q Do you have any knowledge as to why Mr. Miller would  
25 have found it necessary to explain to his secretary his

1 various titles?

2 A No.

3 Q We can turn to Bureau Exhibit Number 379. And this  
4 appears to be a form letter on TBN stationery dated  
5 November 22, 1991. Is that a correct characterization?

6 A Yes.

7 Q What was the purpose of this letter?

8 A Well, without reading it, I, I wouldn't be able to,  
9 to tell you.

10 Q Well, please take a moment out --

11 A Okay.

12 Q -- or take all the time you need, rather, to examine  
13 the letter.

14 A This is a draft of a letter that I was proposing to  
15 send as a response to people that wrote to TBN regarding the  
16 purpose of the Philadelphia station by NMTV.

17 Q How is it that people would know to write to TBN  
18 about NMTV's proposed purchase of the station?

19 A Because there was an announcement made over TBN by  
20 Mr. Crouch that the affiliate NMTV had an opportunity to buy a  
21 station in Philadelphia and there was already some cable  
22 coverage of TBN stations in that area. So, therefore, we got  
23 a lot of response from people wanting information about the  
24 station.

25 Q Do you know whose handwriting this is on page one of