

1 Q And you don't know what offices NMTV had, you
2 told me, right?

3 A What officers they had?

4 Q I'm not now talking about the names of the
5 persons filling the jobs. I am talking about the job
6 titles.

7 While you were vice president, did you know
8 what other offices NMTV had?

9 A What other locations they had?

10 Q No, the officers, o-f-f-i-c-e-r-s.

11 A No. I guess I was just into the big three.

12 Q "The big three" being whom?

13 A Paul Crouch, Jane Duff and myself.

14 Q So you don't know who the other officers were?

15 A No.

16 Q Now, is the name Al Brown a name that is
17 familiar to you?

18 A Uh-huh. Yes.

19 Q Now, did he have any relationship to NMTV?

20 A He was like Terry Hickey.

21 Q What do you mean by that?

22 A Yes, he did, but I don't know what his exact
23 position was.

24 Q Do you know what his responsibilities were?

25 A I think he was in finances also.

1 Q Do you know if he was an officer of the
2 corporation?

3 A No, I'm not sure if he was or not.

4 Q Do you know if he had any responsibilities at
5 TBN?

6 A At TBN, because I knew him in Texas, and then I
7 knew him over here in California, I think he was a station
8 manager there. But I'm not absolutely positive that's his
9 official title.

10 Q And when he came here to California, do you
11 know what his job was?

12 A Same type thing. He kind of oversaw how the
13 station was run. But I'm not sure if it was station manager
14 or if it was financial officer.

15 Q Did he ever come to any of the board meetings
16 of NMTV?

17 MR. TOPEL: Excuse me. Who are we talking about,
18 Mr. Cohen?

19 MR. COHEN: Al Brown.

20 MR. TOPEL: That's what I thought.

21 BY MR. COHEN:

22 Q Did he ever come to any of the board meetings
23 of NMTV?

24 A For sure I think he was at one of them. I
25 don't remember him as a regular or anything like that.

Sarnoff
DEPOSITION

1 Q Do you know if he received any income from
2 NMTV?

3 A I don't know if he did or not.

4 Q Do you know if he received any income from
5 Trinity?

6 A I imagine he was paid.

7 Q He may have received income from NMTV, but you
8 just don't know; that's what you're saying?

9 A Might have been.

10 Q Charlene Williams, is that a name you're
11 familiar with?

12 A Uh-huh.

13 Q Did she have any responsibilities at NMTV?

14 A I'm not sure what her responsibilities would
15 have been.

16 Q At NMTV?

17 A Right.

18 MR. SHOOK: That sound you made before signified a
19 yes, did it not?

20 THE WITNESS: Yes.

21 BY MR. COHEN:

22 Q So you don't know what she did for --

23 A No, I don't know her detailed duties or
24 anything like that.

25 Q Do you know if she was an officer of NMTV?

1 A No, I don't know.

2 Q Do you know if she received any income from
3 NMTV?

4 A I do not know if she did.

5 Q Do you know if she had any relationship to TBN?

6 A I don't know if she did.

7 Q Did she used to come to NMTV board meetings
8 while you were there?

9 A No.

10 Q Do you know a man named Phillip Crouch?

11 A Yes, sir.

12 Q You don't have to say "sir" to me. I will say
13 "sir" to you because you're the witness, but you don't have
14 to say "sir" to me.

15 Did he have any relationship to NMTV while you
16 were there?

17 A Official position-wise, I don't think so.

18 Q What about in terms of responsibilities?

19 A Even responsibility-wise, I don't think so.

20 Q What was his relationship to NMTV?

21 A I think he was involved like Al Brown or Terry
22 Hickey, maybe on the financial end of it.

23 Q Do you know if he was an officer of NMTV?

24 A I think he was an officer.

25 Q OF NMTV?

1 A I think he was.

2 Q What office did he hold?

3 A I don't know. I mean, the officers, I just
4 think of the group of officers. I didn't know they all had
5 specific titles.

6 Q Do you know if he received any income from
7 NMTV?

8 A No, I don't know.

9 Q Is the name Matt Crouch a name that's familiar
10 to you?

11 A Uh-huh. Yes, sir.

12 Q And who is Matt Crouch?

13 A He was, I believe, one of the officers, and I
14 mean just an officer, one of the group.

15 Q The NMTV group?

16 A Yes.

17 Q And did he have any duties at NMTV?

18 A I'm sure he did, but I don't know what they
19 were.

20 Q Did he attend board --

21 A I remember him at one or two meetings.

22 Q And you don't know if he was an officer of
23 NMTV?

24 A I don't know for sure officially.

25 Q And you don't know what office he held?

1 A I don't know for sure.

2 Q And you don't know whether he received any
3 income from NMTV?

4 A I don't know if he did.

5 Q I now want to ask you a few detailed questions
6 about NMTV's operations, and either you know or you don't
7 know. And we'll try to do this quickly.

8 Did you ever receive any written reports for
9 Portland concerning station revenue?

10 A Sent to me personally?

11 Q Did you ever receive any written reports about
12 the revenue received by the Portland station?

13 A At a board meeting we received financial
14 reports that included Portland, yes.

15 Q And those financial reports, what information
16 did they contain?

17 A The kind of finances that the station was
18 bringing in and what things were costing and what things
19 that they had planned and budgeted to buy or produce, kind
20 of a basic overview of the accounting.

21 Q And how often did you review those reports?

22 A I just remember doing that one time.

23 Q And that was for both Portland and Odessa or
24 just Portland?

25 A Portland is what I remember real clearly.

Sarnoff
DEPOSIT

1 Q What about Odessa?

2 A I think Odessa, because of it being an outgoing
3 station, in my mind, I was just concerned with Portland.

4 Q So you don't recall reviewing that information
5 about Odessa?

6 A Not real clearly.

7 Q But am I correct that the review you talked
8 about was at a board meeting and the documents were at the
9 board meeting?

10 A Yes.

11 Q But you have no recollection of ever having
12 been sent those documents so that you could study them
13 before the board meeting, for example?

14 A I believe I was told I could take home a copy
15 of them. But I never was sent them to my home and
16 challenged to review them.

17 Q Am I correct that it was not the practice of
18 NMTV while you were a vice president or director to send you
19 documents for you to study and review before they would be
20 discussed at a board meeting?

21 A I believe it was the practice of NMTV. I
22 believe it was not Pastor Phil's practice.

23 Q It was their practice to send you the documents
24 in advance so that you could review them before the meeting?

25 A I believe it was their practice to send the

1 documents in advance or to notify me I could get the
2 documents. But I believe that I was probably adverse to
3 that happening.

4 Q You chose not to avail yourself, then?

5 A Yes.

6 Q And why is that?

7 A Because I'm a visionary man. My whole ideal is
8 ideals and concepts, and they are about as far as you can
9 get from details on pieces of paper, if that makes any
10 sense.

11 Q It makes good sense. You are a big picture
12 man.

13 A Major big picture.

14 Q Major big picture.

15 Have you ever heard of the term "employee
16 handbook"?

17 A Yes.

18 Q Have you ever seen an employee handbook that
19 NMTV produced or has?

20 A I don't recall personally seeing one.

21 Q Let me show you one and see if you recognize
22 it. I want to show you a document that's entitled "Employee
23 Handbook of NMTV."

24 A I remember that now.

25 Q Have you seen that document before?

1 A Yes.

2 Q And when did you see it before?

3 A Gosh, it's been quite a while. I think I saw
4 it back in -- seems like I saw it at a board meeting.

5 Q Were you ever given your own copy of that
6 document?

7 A I'm sure I was. I'm sure I handed it to my
8 secretary or filed it.

9 Q And how much time did you spend reviewing it,
10 if you can recall?

11 A I can't recall. But I'm sure it wasn't a real
12 long time.

13 Q Would you estimate the number of minutes, 10,
14 15?

15 A Two.

16 Q Are you aware of whether Trinity has an
17 employee handbook?

18 A I believe they do. I mean, I don't recall
19 seeing it.

20 Q So you don't know if they're identical?

21 A No, I don't.

22 Q Are you aware of whether NMTV has something
23 called a group benefits plan?

24 A I don't recall or remember that right offhand.

25 Q Did NMTV while you were there have a sick leave

1 policy for employees?

2 A I'm not aware of it.

3 Q Did it have a vacation policy for employees?

4 A I'm not sure.

5 Q Now, you were a director and an officer from

6 August 1990 to April 13th of 1993. But my question is:

7 During that period of time do you ever remember any

8 disagreements at the board meetings of any kind,

9 disagreements among the board members on any issues?

10 A One time I remember we were talking about
11 finances and how people were getting paid and things like
12 that, and I remember, you know, being concerned about I
13 thought in a real vague, general way people should get paid
14 more. You know, I thought Jim was doing a great job up at
15 the station in Portland, and give him a raise, that type of
16 thing.

17 And Paul was usually more conservative about
18 his thinking on finances. And him and I have had our own
19 personal, you know, even though it was at a board meeting,
20 personal disagreements in that sense.

21 Q About these matters that you've just described?

22 A Money.

23 Q About money for NMTV? You mean how you spend
24 money?

25 A Yes.

Saravali

1 Q And what was the resolution of this
2 disagreement? How did it work out?

3 A Well, to my best recollection, we were going to
4 help out the employees, you know, and I can't remember if he
5 was going to give them a raise or give them more benefits or
6 sick leave or anything like that, but I remember giving a
7 hurray and a shout to help out the employees.

8 Q And was there a vote taken on that?

9 A Yes.

10 Q And what was the vote?

11 A I think everybody was in agreement. I don't
12 recall, but I think everybody was in agreement.

13 Q Can you recall any other times when there were
14 any disagreements among the board members about other
15 instances?

16 A I mean, things that maybe weren't in the
17 minutes or just personal --

18 Q Just whatever.

19 A We discussed everything -- I'm just kind of
20 speaking out loud right now.

21 Q Sure.

22 A We discussed everything as a group all the
23 time. I was real strong, and Paul and Jane were too, but I
24 was real strong on community programs and wanting to do
25 things, and I was pretty outspoken about what I wanted to

1 see done as far as community projects and things like that.
2 And I didn't necessarily have opposition, but people weren't
3 as strong as necessarily I was. I'm a pretty opinionated
4 guy on some things.

5 Q What community projects were you talking about?

6 A I wanted to be able to get some things that
7 would inform people about gangs, the Bloods, the Crips,
8 about violence, culture of minorities, what they thought,
9 things like that. The reason I was stronger about it is I'm
10 aware of it, and Paul just was more ignorant of it because
11 that wasn't his background.

12 Q I understand your words, but I'm not sure I
13 understand what you're saying.

14 You wanted to have programming on these
15 matters, is that what you are talking about?

16 A Yes, programming on these matters.

17 Q Programming where?

18 A National Minority. Oregon would be our first
19 place doing that where we could produce something, where we
20 could have minorities come in there, minorities be given a
21 chance to work. Like I said, I didn't have opposition, per
22 se, like butting heads, but I was just more opinionated.

23 Q Why would Oregon be a better place to have done
24 that than Odessa?

25 A Because we were dealing with getting rid of

1 Odessa, and we were considering the Wilmington, Delaware
2 area there, Philadelphia area. And Odessa, in my mind, I
3 don't know how Paul and Jane felt, but, in my mind, it was
4 kind of like, it was happening in Philadelphia and Delaware.
5 That's where my focus was at.

6 Q In Philadelphia and Delaware?

7 A Yes.

8 Q More than Odessa?

9 A Yes.

10 Q Weren't there more minorities in Odessa than
11 Portland?

12 A Not that I knew of.

13 Q Did you have specific programs in mind that you
14 wanted to be broadcast over Portland?

15 A I had just more involvement by minorities, more
16 involvement. I didn't have any storybook ideals out like
17 that, but I started doing things like that on my own. I
18 started having cameramen go out with me, and I started doing
19 my own putting together of programming.

20 Q Did you have specific proposals for programs to
21 be broadcasted?

22 A I didn't have them written up, but they were
23 definitely in the making.

24 Q So what happened to your ideas?

25 A They've just never been completed yet. Big

1 ideals. They just haven't all been put together yet.

2 Q Were there any other areas of disagreement
3 between you and any other board member?

4 A No. Everybody was pretty outspoken about what
5 they believed in, but we had a good common goal to reach
6 people.

7 Q Were there ever any votes that were not
8 unanimous that you can recall?

9 A I don't recall if there was.

10 Q I now want to ask you a few questions about
11 some minutes that occurred during your watch, as
12 ex-President Reagan would say.

13 I want to show you a minute that was a minute
14 of NMTV dated August 15, 1990, document 02020, and ask you,
15 Pastor, if you will spend a minute looking at that document,
16 because I want to ask you a couple of questions about it, so
17 please read it.

18 A Okay.

19 Q First of all, have you ever seen that document
20 before this minute, before this time?

21 A Yes. It looks real familiar.

22 Q When did you see it before?

23 A I don't recall when I saw it before.

24 Q Do you recall if you saw it on or about August
25 15, 1990?



1 A I could have seen it shortly after that or at
2 the next board meeting. But, I mean, every word in here I
3 feel like I've read it.

4 Q There came a time when you did see that
5 document?

6 A Uh-huh.

7 Q Now, do you remember seeing that document
8 before --

9 MR. SHOOK: Before we go on, that last answer was a
10 yes, wasn't it?

11 THE WITNESS: Yes.

12 BY MR. COHEN:

13 Q Do you remember seeing that document unsigned?

14 A I don't recall if it was signed or unsigned.

15 Q Now, the meeting that is referenced here, it
16 states that those present included board members Paul Crouch
17 and Jane Duff and that Phillip Aguilar was also present and
18 was accompanied by his son.

19 Now, do you remember whether anyone else was
20 present at that meeting?

21 A My son was there with me. I think that
22 Mr. Juggert was there.

23 Q And where was the meeting held in Newport
24 Beach?

25 A At a hotel. I think it was the Meridian. You

1 walk in and there is a big water fountain in the middle and
2 all that kind of stuff.

3 Q Now, the minutes state, and I'm quoting, "The
4 responsibilities of board membership was explained to
5 Mr. Aguilar."

6 First of all, who explained the
7 responsibilities of board membership to you?

8 A Well, Paul and Jane were both talking. I don't
9 remember which one actually did the most explanation. It
10 was kind of like a group conversation of the kind of things
11 that were going to happen, kind of going on.

12 Q What did they tell you were the
13 responsibilities of board membership?

14 A That I'd be involved in the acquisition of
15 stations and helping to reach out to minorities, that I'd be
16 getting into setting some policies at stations, not all the
17 things that I was real familiar exactly what it all meant or
18 do understand now, but that I'd be involved in NMTV, in all
19 the aspects of it.

20 Q Now, you attended a number of board meetings
21 while you were an officer and director. Can you give me an
22 estimate of how long the typical or average meeting lasted?

23 A At least a couple hours.

24 Q Now I want to show you a minute numbered 52958.
25 It's a special meeting of NMTV held on October 5, 1990. And

1 you were not present. I want to make sure you understand
2 that. But I want you to read the minute, if you would.

3 A Okay.

4 Q First of all, are you clear in your mind that
5 you were not present at that meeting?

6 A Yes.

7 Q Why were you not?

8 A I do a lot of traveling to a lot of meetings at
9 churches, about 150 churches a year I go to speak at, so I'm
10 out of town a lot.

11 Q According to this consent, it states that you
12 consented to the above-referenced October 15th board of
13 directors meeting and confirmed the actions that the board
14 of directors set forth herein above.

15 Was this document sent to you for your
16 signature or did you sign -- your signature is dated
17 10/25/90 and the meeting was held on 10/22/90, which is only
18 three days, so was this document sent to you?

19 A I'm sure it was sent to me and I signed it.

20 Q Or did you go to the NMTV or Trinity offices?

21 A No. I usually leave like on a Thursday night,
22 back on Saturday, leave on Sunday morning, back on Monday,
23 Tuesday. I usually don't stay away too long.

24 Q Did you read this consent before you signed it?

25 A Yes.

1 Q It states here that the board discussed recent
2 efforts to sell the station located at Midland/Odessa,
3 Texas.

4 As of the time you signed this, were you
5 familiar with the efforts to sell the Odessa station?

6 A Yes.

7 Q And what were those efforts?

8 A In particular, what do you mean?

9 Q Well, what efforts were you aware of? What was
10 going on?

11 A That the station was going to be sold and that
12 we were going to do it for the purpose of acquiring another
13 station.

14 Q Who had NMTV been negotiating with?

15 A Jane and Paul, to my knowledge.

16 Q Who were you trying to sell the station to?
17 Who was NMTV trying to sell the station to, if you know?

18 A The name of the company?

19 Q Do you know the names of the companies that --

20 A I can look it up in my files, yeah.

21 Q But you don't know?

22 A I don't recall it off the top of my head.

23 MR. SHOOK: Before we go on, I think there were a
24 couple of statements in terms of dates, and that meeting
25 date was October 5 and the minutes were signed October 22.

1 MR. COHEN: Your point is very well-taken.

2 MR. SHOOK: So the reference there to an October 15
3 meeting, it didn't occur on October 15. The minutes reflect
4 it occurred on October 5.

5 MR. COHEN: Did I say it occurred on October 15?

6 MR. SHOOK: At least one time.

7 MR. COHEN: I did say the 15th?

8 MR. SHOOK: At least one time. That's why I want to
9 say that the meeting that we have been talking about, the
10 minutes reflect October 5. The date that the minutes were
11 signed by Jane Duff was October 22, and then your signature
12 is October 25, just to keep the time sequence straight.

13 MR. COHEN: Thank you. If I confused you, it was
14 inadvertent, and I'm sorry I confused the record.

15 THE WITNESS: I knew I didn't spend that long away
16 from my wife, so I knew it was close.

17 BY MR. COHEN:

18 Q Was the decision to sell Odessa made before you
19 joined the board?

20 A No.

21 Q So you participated in that decision?

22 A I voted on it, yes.

23 Q Why did you want to sell Odessa?

24 A Because of the opportunity to reach more
25 people. All the information that was given to me at the

1 time, it sounded like an exciting opportunity because the
2 amount of people, the number of people, where it was at, I
3 just thought it was a big open door.

4 Q Well, did you know what the minority population
5 was that the Odessa station served?

6 A They gave me some facts on the population, the
7 census, the people and all that thing, but everything in
8 this other deal seemed to outweigh it a hundredfold.

9 Q First let me ask you: Did you have any idea
10 what the minority population was that was served by the
11 Odessa television station?

12 A I don't remember the exact numbers.

13 Q Were those numbers given to you?

14 A I'm sure they gave me a lot of facts on that,
15 and the figures of people were all involved in that, yes.

16 Q And you were told what the minority population
17 was served by the station?

18 A I don't remember exactly the details given to
19 me, no.

20 Q Do you remember any of the contents of what was
21 given to you?

22 A The amount of people that could be reached and
23 serviced.

24 Q Were you told the amount of minority members of
25 the population?

1 A I don't recall.

2 Q What information, if any, were you given about
3 the profitability of the Odessa station?

4 A Basically my whole focus was on the amount of
5 people that could be reached. I didn't even really recall
6 what the profitability financially would be.

7 Q Do you know if the station was operating at a
8 loss?

9 A The Odessa one?

10 Q Yes.

11 A They gave me the figures and facts on it. I
12 don't think it was any -- I think it was holding its own. I
13 think that's what I recall, it was holding its own. I don't
14 remember anything about it being belly up, and I don't
15 remember anything about it being a great gold mine or
16 anything like that.

17 Q Why did you not ever travel to Odessa to assess
18 the situation yourself?

19 A I just trusted on the consulting that people
20 had done right there, the paperwork.

21 Q The consulting was done by whom?

22 A Paul, Jan and whoever else they got info from
23 who ran the station there.

24 Q And did the station manager come and meet with
25 you?

1 A Not with me personally.

2 Q Did the station manager meet with any
3 representatives of NMTV, any board members of NMTV, to your
4 knowledge?

5 A Not that I'm aware of.

6 Q Now, there is a reference here to the fact that
7 Prime Time TV, Inc. expressed an interest with reservations.
8 Did you have any knowledge when you signed this
9 minute as to the extent of Prime Time TV, Inc.'s interest in
10 purchasing the station?

11 A I wasn't aware of those details.

12 Q Did you know anything about Prime Time TV,
13 Inc.'s ownership?

14 A I don't recall.

15 Q Did you know anything about their financial
16 capability to purchase the station?

17 A I don't recall.

18 Q Did you know anything at all about Prime Time
19 TV, Inc. when you signed this minute?

20 A I don't recall.

21 Q Did you know anything about the leadership of
22 Prime Time TV, Inc.?

23 A I don't recall.

24 Q And the final paragraph says that the board
25 passed a resolution that permitted the president to



1 negotiate an agreement for the sale of the station.

2 Were any instructions given to the president in
3 terms of the minimum price that would be acceptable to the
4 board?

5 A We talked figures about that, and if I could
6 look them up from my secretary, I know we had some figures
7 that we talked about and certain money to be spent, but I
8 don't recall what those figures are right now.

9 Q Do you recall whether the board gave the
10 president any instructions concerning the terms of the sale?

11 A I'm sure we talked about terms and everything
12 like that, but I don't recall what the terms are or anything
13 like that. But I'm sure I could look those things up.

14 Q Do you recall whether the board gave the
15 president any instructions concerning the kind of security
16 that would be permissible in the event it was a purchase
17 over time?

18 A I don't recall that.

19 Q Do you remember how many board meetings you
20 missed while you were vice president and director, Pastor?

21 A How many I missed?

22 Q Yes.

23 A I think I was at over 50 percent of them.

24 Q Well, according to what I've been able to glean
25 from the records, you missed the October 15, 1991 meeting --

1 MR. SHOOK: Again, you mean October 5?

2 MR. COHEN: Boy, October 5, 1991.

3 Q My notes are not clear on that. I don't want
4 to give you bum information. I have this out of sequence.
5 But there was a meeting, and I apologize for this, on
6 January 21, 1991, which you missed. And look at that
7 document. Wait a minute. I need to start again.

8 The first meeting was October 5, 1990. This
9 meeting is the next meeting that you missed, January 21,
10 1991. According to the minutes, you were not present at
11 that meeting; is that correct?

12 A Correct.

13 Q Now, I do not have, and maybe, Mr. Topel, if
14 you have it, please tell me, I don't have any consent signed
15 by the witness to the January 21, 1991 meeting. Do you have
16 such a consent?

17 MR. TOPEL: No, sir.

18 BY MR. COHEN:

19 Q Do you recall signing a consent to the January
20 21, 1991 meeting like you did with the October 5, 1990
21 meeting?

22 A Yes, sir.

23 Q I see. Do you have such a consent in your
24 records?

25 A I should have it.

1 Q Would you please provide a copy to Mr. Topel?

2 A Okay.

3 MR. SHOOK: Just to clarify something, so that we're
4 all talking about the same thing, and maybe you're looking
5 for the right thing, the January 1991 meeting that you're
6 referring to, the minutes reflect that Reverend Aguilar gave
7 Dr. Crouch a proxy.

8 MR. COHEN: Your point is well-taken.

9 MR. SHOOK: I think that's what he should be looking
10 for with respect to this meeting.

11 MR. COHEN: I guess you're right. That would be the
12 proper thing, a proxy. Thank you for that help.

13 Q Would you look for a proxy? Do you know what I
14 mean by "proxy"?

15 A One that says "proxy" on it.

16 Q Do you know what a proxy is?

17 A In place of.

18 Q If you have such a document, please provide it
19 to Mr. Topel.

20 Now, you gave Paul Crouch your proxy for that
21 meeting, and at that meeting there was a discussion of the
22 bankruptcy proceeding in Wilmington, looking to the possible
23 acquisition of the Wilmington station.

24 There is nothing in the last minute of October
25 5, 1990 concerning the purchase in Wilmington. The only