



**Exhibit M.** By August 2006 this statement had become the topic of public conversation on the internet. This was in part due to Danny Shelton's globally televised broadcast of August 10, 2006. In that broadcast the participants claimed that they and Danny Shelton were being lied about and were being persecuted, but they weren't going to defend themselves. Amid that backdrop Danny Shelton allowed Shelley Quinn to talk about the daughter of the evil Herodias who asked for the head of John the Baptist in such a way that those familiar with Ms. Moore's statement thought that Mrs. Quinn was really talking about Ms. Moore, and was calling her a liar.

6. A release by Gailon Arthur Joy about the child molestation allegations against Tommy Shelton and how Danny Shelton covered up those allegations, which incorporated a statement by myself, is attached hereto as **Exhibit N.**

7. A statement by Pastor Glenn Dryden which announced new allegations in Virginia against Tommy Shelton, is attached hereto as **Exhibit O.**

8. Before the end of December 2006, Danny Shelton was threatening suit over the allegations against Tommy that were surfacing in Virginia.

9. Attorney Riva's letter of January 5, 2007, written on behalf of 3ABN and Tommy Shelton and threatening suit against each member of the board of trustees of the Community Church of God in Dunn Loring, Virginia, is attached hereto as **Exhibit P.**

10. Attorney Gerald Duffy's letter of January 30, 2007, written on behalf of 3ABN and Danny Shelton, and only citing as defamatory issues pertaining to the child molestation allegations against Tommy Shelton, is attached hereto as **Exhibit Q.**

11. Tommy Shelton's open letter to the Community Church of God of around early February 2007 is attached hereto as **Exhibit R.**

12. I served requests to produce documents and things on Three Angels Broadcasting Network, Inc. ("3ABN") on November 29, 2007, and on Danny Shelton on December 7, 2007.

These are attached hereto as **Exhibits S–T**.

13. Correspondence leading up to a discovery conference on January 10, 2008, is attached hereto as **Exhibits U–V**.

14. I was not served 3ABN and Danny Shelton's responses to my Requests to Produce until January 9, 2008, making 3ABN's responses 11 days late, and Danny Shelton's 3 days late. Their responses are attached hereto as **Exhibits W–X**.

15. Discovery conferences were held by phone with Plaintiffs' counsel Jerrie Hayes, Gailon Arthur Joy, and myself in attendance on January 10 and 22, 2008. The former lasted four hours and twenty minutes, and much of the time was spent discussing the relevancy of the various requests. Jerrie Hayes indicated in the conference of January 10 that she did not know about D & L Publishing and DLS Publishing, and I told her that if she did not know about these publishing companies of Danny Shelton, her clients had done her a great disservice.

16. Correspondence with Attorney Jerrie Hayes regarding one small part of the discovery dispute arising from my Requests to Produce is attached hereto as **Exhibit Y**, and demonstrates the great difficulty the Defendants have had negotiating even small portions of the disputed issues.

17. The memorandum filed by Attorney Jerrie Hayes with Plaintiff Shelton's motion to quash my subpoena in U.S. District Court in the District of Minnesota is attached hereto as **Exhibit Z**. My memorandum and affidavit in opposition to that motion, with accompanying exhibits, are attached hereto as **Exhibits AA–CC**. Danny Shelton's affidavit filed with his motion, in which he claimed that D & L Publishing was a sole proprietorship, is attached hereto as **Exhibit DD**.

18. Plaintiffs' counsel never scheduled a hearing for Plaintiffs' December 18, 2007, Motion for a Protective Order, so Gailon Arthur Joy requested that one be scheduled, and one

was promptly scheduled for March 7, 2008. During that hearing Attorney Hayes stated that there was no IRS criminal investigation going on, even though her own proposed protective order filed on December 18, 2007, referred to an investigation by the Department of Justice in ¶ 4.

19. I attempted to arrange a time with Attorney Hayes to inspect and copy the documents responsive to my Requests to Produce on April 9 and 18, 2008, and she responded on April 21, 2008. This correspondence is attached hereto as **Exhibit EE**. Attorney Hayes has never gotten back to me to arrange a time.

20. District of Minnesota Magistrate Judge Boylan's order ordering the production of third-party bank records is attached hereto as **Exhibit FF**.

21. Gregory Scott Thompson is the son of 3ABN Board chairman Walt Thompson, and he has posted on BlackSDA.com using the user name of "fallible humanbeing." He stated in a post on March 9, 2008, that the IRS investigator investigating 3ABN and Danny Shelton had recently had a baby. His post is attached hereto as **Exhibit GG**.

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 15th day of May, 2008.

/s/ Bob Pickle

Bob Pickle  
Halstad, MN 56548  
Tel: (218) 456-2568

Subscribed and sworn to me  
this 15th day of May, 2008.

/s/ Deanna M. Zimmerman  
Notary Public—Minnesota

My Commission Expires Jan. 31, 2010