
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Case No.: 07-40098-RCL

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

**DEFENDANT ROBERT PICKLE'S ANSWERS
TO PLAINTIFF 3ABN'S INTERROGATORIES (FIRST SET)**

**TO: Plaintiff 3ABN and his counsel of record, John P. Pucci, Esq., 64 Gothic Street,
Northampton, MA 01060.**

From Plaintiff 3ABN's Interrogatories:

NOTICE

PLEASE TAKE NOTICE that You are hereby requested and required to furnish answers, under oath, to the following Interrogatories to counsel for Plaintiff Thee Angels Broadcasting, Inc. ("3ABN") within thirty (30) days from the date of service herein pursuant to Federal Rule of Civil Procedure 33(b)(3).

INSTRUCTIONS

In answering these Interrogatories, completely identify or provide all information requested to the full extent known to and ascertainable by You, Your agents, and Your attorney(s), whether or not in Your possession, and whether or not alleged to be privileged

Answer by Defendant Pickle: You stated above that these interrogatories need to be answered “pursuant to Federal Rule of Civil Procedure 33(b)(3),” and then state, “completely identify or provide all information ... whether or not alleged to be privileged.” Yet since Rule 33(c) states, “Interrogatories may relate to any matters which can be inquired into under Rule 26(b)(1),” and Rule 26(b)(1) states, “Parties may obtain discovery regarding any matter, not privileged ...,” your instructions appear grossly out of line and inconsistent. How can you appeal to Rule 33 while at the same time “instructing” us to provide you with all privileged information, something Rule 26 says you are not entitled to have?

Interrogatory No. 1: Identify all persons known or believed by You to have knowledge relating to any of the facts, allegations, claims or averments in Plaintiffs’ Complaint, in Defendants’ Answer, or in any other pleading in this case. In doing so, You are to set forth in detail and with particularity the area of knowledge that each identified person possesses, whether You intend to call the person as a witness in the trial of this matter, whether the individual has provided any information, has been consulted by You, or has participated in the preparation of Your Answers to these Interrogatories, identifying the answer(s) to which the person contributed, and whether the person has been interviewed by You, Your attorney, or anyone else acting on Your behalf, identifying the date of the interview and the individual(s) by whom the person was interviewed.

Answer by Defendant Pickle:

Allegations Against Tommy Shelton and Their Handling by 3ABN and Danny Shelton

Among other things, the following individuals are known or believed to have information regarding the child molestation allegations against Tommy Shelton, and their handling by the 3ABN Board and Danny Shelton. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Tommy & Carol Shelton

Marion, KY 42064-5567
(**) ***_****

Duane Clem (Jan. 2, 2007)
(**) ***_****

Roger Clem

West Frankfort, IL 62896
(**) ***_**** (hm)
(**) ***_**** (cell)

Scott Clem
(**) ***_****

Troy Deason
(**) ***_**** (cell)

Glenn Dryden (Aug. 14, 2006)

Dunn Loring, VA 22027
(**) ***_****

David Cronin (Jan. 24, 2007)
(**) ***_**** (wk)

Brad Dunning

Sesser, IL 62884
(**) ***_***)

Gary & Barbara Hall
(**) ***_***)

Charlotte Hopper
(**) ***_***)

Greg Houseworth
(**) ***_***)

Frank Pitts
Unknown

Vicki Barnard

West Frankfort, IL 62896
(**) ***_***)

Sherry Avery
(**) ***_***)

Alice Loucks
(**) ***_***)

Joel Noble
(**) ***_***)

Judy Wood
(**) ***_***)

Roger Deason
(**) ***_***)

Alex Walker
(**) ***_***)

Bruce Steh
c/o Baldwin Piano & Organ
200 N Park Ave
Herrin, IL 62948
(**) ***_***)

Derrell Mundall
(**) ***_**

Rick Shelton
Unknown

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_** (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_**
(618) 627-4651 (wk)

Larry Welch

Marion, IL 62959
(**) ***_**

May Chung

San Bernardino, CA 92408
(**) ***_**

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_**
(**) ***_**

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_**

Larry Ewing

Thompsonville, IL 62890
(**) ***_**
(618) 627-4651 (wk)

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_**

Merlin Fjarli

Medford, OR 97501
(**) ***_**

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(**) ***_**

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_**

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(800) 251-6346

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_**

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Larry Romrell

Franktown, CO 80116
(**) ***_**

Tracy Clem
(**) ***_**

Jerry Cullum
Larry & Brenda Cullum
(**) ***_**

Gary Hall
(**) ***_**

Bill Hopper
(**) ***_**

Dude Wood
(**) ***_**

**Intimidation, Tax Exemption Status, Misuse of 3ABN Property, and Other
Attorney-Related Issues**

Among other things, the following individuals are known or believed to have information pertaining to one or more attorney-related issues. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the

precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

D. Michael Riva
226 East Main St
West Frankfort, IL 62896
(618) 937-2404

Gerald Duffy
100 Washington Avenue South, Suite 1300
Minneapolis, MN 55401
(612) 337-6100

Nick Miller
Director, International Religious Liberty Institute
c/o Andrews University
Seventh-day Adventist Theological Seminary
Berrien Springs, MI 49104
(**) ***_**
(**) ***_**

Follett, Herald

Hillsboro, OR 97124
(**) ***_**

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_** (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_**
(618) 627-4651 (wk)

Larry Welch

Marion, IL 62959
(**) ***_**

May Chung

San Bernardino, CA 92408
(**) ***_**

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(269) 471-7771

Larry Ewing

Thompsonville, IL 62890
(**) ***_**
(618) 627-4651 (wk)

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_**

Ellsworth McKee
PO Box 750

Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(800) 251-6346

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_**

Larry Romrell

Franktown, CO 80116
(**) ***_**

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_**

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_**
(**) ***_**

Merlin Fjarli

Medford, OR 97501
(**) ***_**

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(**) ***_**

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Financial-Related Issues

Among other things, the following individuals are known or believed to have information regarding financial matters. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of

answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Derrell Mundall
(**) **_****

Robert Russell

Chicago, IL 60626
(**) **_****
(**) **_**** (cell)

Glenn Dryden

Dunn Loring, VA 22027
(**) **_****

Nick Miller
Director, International Religious Liberty Institute
c/o Andrews University
Seventh-day Adventist Theological Seminary
Berrien Springs, MI 49104
(**) **_****
(**) **_****

Duane Clem
(**) **_****

Shelley Quinn
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Linda Shelton

Springfield, IL 62704
(**) **_**** (hm)
(**) **_**** (cell)

Greg Morikone

Thompsonville, IL 62890
(**) ***_****

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_**** (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_****
(618) 627-4651 (wk)

Kenneth A. Denslow
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_****
(**) ***_****

May Chung

San Bernardino, CA 92408
(**) ***_****

Larry Welch

Marion, IL 62959
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(**) ***_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Merlin Fjarli

Medford, OR 97501
(**) ***_****

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Larry Romrell

Franktown, CO 80116
(**) ***_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Larry Ewing

Thompsonville, IL 62890
(**) ***_****
(618) 627-4651 (wk)

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Alan Lovejoy
Gray Hunter Stenn
2602 W. DeYoung
PO Box 1728
Marion, Illinois 62959
(618) 993-2647

Bill Whittington
(**) ***_****

Ema Lou Shelton
(618) 627-4651 (wk)

Joan Russell

Chicago, IL 60626
(**) ***_****
(**) ***_**** (cell)

David Everett
(618) 627-4651 (wk)

Absher-Arnold Motors
3203 West DeYoung St.
Marion, IL 62959
(618) 993-5000

Stephen Lewis
c/o The Present Truth

Palmdale, CA 93550
PO Box 900729
Palmdale, CA 93590
(**) ***_****

Steve Shelton
Unknown

Bruce & Tammy Chance

West Frankfort, IL 62896
(**) ***_****

Phone Calls and Phone Card Phone Records

Among other things, the following individuals are known or believed to have information regarding matters pertaining to phone calls and phone card phone records. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

John Lomacang (Sept. 1, 2006)

Thompsonville, IL 62890-3416
(**) ***_****
(618) 627-2065 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_****
(618) 627-4651 (wk)

Linda Shelton

Springfield, IL 62704
(**) ***_**** (hm)
(**) ***_**** (cell)

Johann Thorvaldson
Unknown

Arild Abrahamsen
Unknown

Derrell Mundall
(**) ***_****

Robert Russell

Chicago, IL 60626
(**) ***_****
(**) ***_**** (cell)

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_**** (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Larry Welch

Marion, IL 62959
(**) ***_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

May Chung

San Bernardino, CA 92408
(**) ***_**

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(800) 251-6346

Merlin Fjarli

Medford, OR 97501
(**) ***_**

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_**
(**) ***_**

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(**) ***_**

Larry Romrell

Franktown, CO 80116
(**) ***_**

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_**

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_**

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_**

Larry Ewing

Thompsonville, IL 62890
(**) ***_**
(**) ***_** (wk)

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_**

Audio and Video Recordings, and Surveillance

Among other things, the following individuals are known or believed to have information regarding matters pertaining to audio and video recordings made of Linda Shelton and claimed to contain evidence regarding Danny Shelton's biblical right to divorce. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Hal Steenson (Aug. 4, 2006)

Johnston City, IL 62951
(**) ***_***)

Harold Lance (Jan. 24, 2007)

Ukiah, CA 95482
(**) ***_***)

Nick Miller
Director, International Religious Liberty Institute
c/o Andrews University
Seventh-day Adventist Theological Seminary
Berrien Springs, MI 49104
(**) ***_***)
(**) ***_***)

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_***) (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_***)
(**) ***_***)

Mollie Steenson

Johnston City, IL 62951
(**) ***_***)
(618) 627-4651 (wk)

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) **_****
(**) **_****

Larry Welch

Marion, IL 62959
(**) **_****

May Chung

San Bernardino, CA 92408
(**) **_****

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) **_****

Merlin Fjarli

Medford, OR 97501
(**) **_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) **_****

Larry Romrell

Franktown, CO 80116
(**) **_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Larry Ewing

Thompsonville, IL 62890
(**) ***_****
(618) 627-4651 (wk)

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

**Danny Shelton's Divorce, Conduct, and Remarriage, the 3ABN Board, and the
Thompsonville Church**

Among other things, the following individuals are known or believed to have information regarding Danny Shelton's divorce, conduct, and remarriage, the 3ABN Board, and the Thompsonville Church. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

John Lomacang (Sept. 1, 2006)

Thompsonville, IL 62890-3416
(**) ***_***)
(618) 627-2065 (wk)

Brenda Walsh

Knoxville, TN 37922
(**) ***_***) (cell)

Linda Shelton

Springfield, IL 62704
(**) ***_***) (hm)
(**) ***_***) (cell)

Johann Thorvaldson
Unknown

Arild Abrahamsen
Unknown

Barbara Kerr
Unknown

Kay Kuzma, President Family Matters Ministry

LaFollette, TN 37766
(**) ***_***)
(**) ***_***) (cell)

Jay Gallimore

Eagle, MI 48822
(**) ***_***)

Alyssa Moore

Springfield, IL 60386
(**) ***_***) (hm)

Nick Miller
Director, International Religious Liberty Institute
c/o Andrews University
Seventh-day Adventist Theological Seminary
Berrien Springs, MI 49104
(**) ***_**
(**) ***_**

Mable Dunbar, Women's Ministries Director
Upper Columbia Conference
3715 S. Grove Road
Spokane, Washington 99224
PO Box 19039
Spokane, WA 99219
(509) 838-2761

Steve & Samantha Nelson
(**) ***_**

Richard & Cheri Bethune
Unknown

Carole Chapman

Las Vegas, NV 89128

Fred Millea
(**) ***_**

Everlina Germany
(**) ***_**

Gregory Matthews

Longmont, CO 80501
(303) 399-8020 Ex 2242 (wk)
(**) ***_** (hm)

Kevin Paulson
(**) ***_**

William & Brenda Shelton
Unknown

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_**** (cell)

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Nathan Moore
Unknown

Brandy Shelton
Unknown

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

May Chung

San Bernardino, CA 92408
(**) ***_****

Kenneth A. Denslow
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_****
(**) ***_****

Merlin Fjarli

Medford, OR 97501
(**) **_****

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) **_****
(**) **_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) **_****
(800) 251-6346

Larry Romrell

Franktown, CO 80116
(**) **_****

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) **_****

Larry Ewing

Thompsonville, IL 62890
(**) **_****
(618) 627-4651 (wk)

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Mollie Steenson

Johnston City, IL 62951
(**) ***_****
(618) 627-4651 (wk)

Larry Welch

Marion, IL 62959
(**) ***_****

Use of Broadcasts and Other Means to Malign Plaintiffs' Critics and Neutralize Child Molestation Allegations

Among other things, the following individuals are known or believed to have information regarding matters pertaining to 3ABN's use of broadcasts and other means for inappropriate damage control. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_**** (cell)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_****
(618) 627-4651 (wk)

Larry Ewing

Thompsonville, IL 62890
(**) ***_****
(618) 627-4651 (wk)

John Lomacang (Sept. 1, 2006)

Thompsonville, IL 62890-3416
(**) ***_****
(618) 627-2065 (wk)

Shelley Quinn
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

C A Murray, Production Manager
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Dee Hildebrand
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Alyssa Moore

Springfield, IL 60386
(**) ***_**** (hm)

Linda Shelton

Springfield, IL 62704
(**) ***_**** (hm)
(**) ***_**** (cell)

Bonnie Ensminger
c/o Amazing Facts
PO Box 1058
Roseville, CA 95678
1203 West Sunset Blvd
Rocklin, CA 95765
(916) 434-3880

Stan Jensen
Unknown

Cindy Conard

Oxford, Indiana 47971
(**) ***_****

Ronnie & Teresa Shelton

Okmulgee, OK 74447
(**) ***_****

Tommy & Carol Shelton

Marion, KY 42064-5567
(**) ***_****

Gregory Scott Thompson

Madison, WI 53704
(**) ***_****

Larry Welch

Marion, IL 62959
(**) ***_****

Merlin Fjarli

Medford, OR 97501
(**) ***_****

May Chung

San Bernardino, CA 92408
(**) ***_****

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(**) ***_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_****
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Larry Romrell

Franktown, CO 80116
(**) ***_****

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Robert Russell

Chicago, IL 60626
(**) ***_****
(**) ***_**** (cell)

Robert 'Bob' Davis
3391 Charley Good Rd
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Melody Firestone and Similar Situations

Among other things, the following individuals are known or believed to have information regarding matters pertaining to Melody Firestone and similar situations. We may call any or all of

these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Melody Shelton Mundall Firestone
Unknown

Derrell Mundall
(**) ***_***)

John Lomacang (Sept. 1, 2006)

Thompsonville, IL 62890-3416
(**) ***_***)
(618) 627-2065 (wk)

Nancy O'Brien
(618) 627-2065 (wk)

Linda Shelton

Springfield, IL 62704
(**) ***_***) (hm)
(**) ***_***) (cell)

William & Brenda Shelton
Unknown

Greg Firestone
Unknown

Joe O'Brien
(618) 627-4651 (wk)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_**** (cell)

Kenneth A. Denslow
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_****
(**) ***_****

Larry Welch

Marion, IL 62959
(**) ***_****

May Chung

San Bernardino, CA 92408
(**) ***_****

Mollie Steenson

Johnston City, IL 62951
(**) ***_****
(618) 627-4651 (wk)

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(**) ***_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Larry Romrell

Franktown, CO 80116
(**) ***_****

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Larry Ewing

Thompsonville, IL 62890
(**) ***_****
(618) 627-4651 (wk)

Merlin Fjarli

Medford, OR 97501
(**) ***_****

Trust Services and Whistle Blower-Related Issues

Among other things, the following individuals are known or believed to have information regarding matters pertaining to trust services. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Ervin Thomsen
(**) ***_****

Kathi Bottomley
(**) ***_****

Trenton & Oriana Frost

Avon Park, FL 33825-7838
(**) ***_****
(**) ***_**** (cell)

Hope LeBrun

Lake Isabella, CA 93240
(**) ***_****

Nick Miller
Director, International Religious Liberty Institute
c/o Andrews University
Seventh-day Adventist Theological Seminary
Berrien Springs, MI 49104
(**) ***_****
(**) ***_****

Duane Clem
(**) ***_****

Kenneth A. Denslow
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559

(**) **_**

(**) **_**

Walter C. Thompson

Lake Geneva, WI 53147

(**) **_** (cell)

Mollie Steenson

Johnston City, IL 62951

(**) **_**

(618) 627-4651 (wk)

Larry Welch

Marion, IL 62959

(**) **_**

Danny Shelton

West Frankfort, IL 62896

(618) 627-4651 (wk)

May Chung

San Bernardino, CA 92408

(**) **_**

Merlin Fjarli

Medford, OR 97501

(**) **_**

Larry Ewing

Thompsonville, IL 62890

(**) **_**

(618) 627-4651 (wk)

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(**) ***_****

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Larry Romrell

Franktown, CO 80116
(**) ***_****

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

ASI Membership, Grants, Tribunal, and Promotion

Among other things, the following individuals are known or believed to have information regarding matters pertaining to Adventist-laymen's Services and Industries (ASI) and its connections with 3ABN. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

Deb Young, President, 2003-2007

Ypsilanti, MI 48198-9514
(**) ***_****

Donna McNeilus, President, Present

Dodge Center, MN 55927
(**) ***_****

Harold Lance, ASI Missions, Inc. President (Jan. 24, 2007)

Ukiah, CA 95482
(**) ***_****

Ron Cristman, ASI Exec. Secretary
12501 Old Columbia Pike
Silver Spring , MD 20904
(301) 680-6450 (wk)

Sharon Robberson

Apison, TN 37302
(**) ***_****

Gregory Matthews

Longmont, CO 80501
(303) 399-8020 Ex 2242 (wk)
(**) ***_**** (hm)

Linda Shelton

Springfield, IL 62704
(**) ***_**** (hm)
(**) ***_**** (cell)

Gloria Wilson
PO Box 486

Weimar, Ca 95736
(**) ***_****
(**) ***_****

Derrell Mundall
(**) ***_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Mollie Steenson

Johnston City, IL 62951
(**) ***_**
(618) 627-4651 (wk)

Kenneth A. Denslow (Oct. 23, 2006)
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_**
(**) ***_**

Cindy Tutsch
(**) ***_** (wk)

Mark Finley, General Conference General Vice President
12501 Old Columbia Pike
Silver Spring , MD 20904
(**) ***_** (cell)

Jan Paulsen, General Conference of Seventh-day Adventists, President
12501 Old Columbia Pike
Silver Spring, MD 20904
(**) ***_**

May Chung

San Bernardino, CA 92408
(**) ***_**

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_**
(**) ***_**

Merlin Fjarli

Medford, OR 97501
(**) ***_**

Larry Welch

Marion, IL 62959
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_****

Larry Romrell

Franktown, CO 80116
(**) ***_****

Larry Ewing

Thompsonville, IL 62890
(**) ***_****
(618) 627-4651 (wk)

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_***) (cell)

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Miscellaneous Issues

Among other things, the following individuals are known or believed to have information regarding miscellaneous issues. We may call any or all of these individuals as a witness in the trial of this matter. None of them have participated in or been consulted regarding the preparation of answers on this topic for these interrogatories. We do not presently recall the precise dates of any interviews or conversations (oral or written) we had with them regarding this topic, except where noted.

The Greers
Unknown

Greg Owen
(**) ***_***)

Kenny Shelton
Unknown

Darlene Pickle
(**) ***_***)

Robert Gentry
PO Box 12067
Knoxville, TN 37912
(**) ***_***)

Walter C. Thompson

Lake Geneva, WI 53147
(**) ***_***) (cell)

Larry Welch

Marion, IL 62959
(**) ***_**

Mollie Steenson

Johnston City, IL 62951
(**) ***_**
(618) 627-4651 (wk)

Kenneth A. Denslow
619 Plainfield Rd., 3rd Floor
Willowbrook, IL 60521

Westmont, IL 60559
(**) ***_**
(**) ***_**

Merlin Fjarli

Medford, OR 97501
(**) ***_**

Danny Shelton

West Frankfort, IL 62896
(618) 627-4651 (wk)

Larry Ewing

Thompsonville, IL 62890
(**) ***_**
(618) 627-4651 (wk)

May Chung

San Bernardino, CA 92408
(**) ***_**

Leonard Westphal

PO Box 7148
Loma Linda, CA 92354
(**) ***_**

Bill Hulsey
PO Box 596
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(**) ***_****

Wintley Phipps

PO Box 8008
Vero Beach, FL 32963
(**) ***_****

Garwin McNeilus

Dodge Center, MN 55927
(**) ***_****

Larry Romrell

Franktown, CO 80116
(**) ***_****

Ellsworth McKee
PO Box 750
Collegedale, TN 37315

Ooltewah, TN 37363
(**) ***_****
(800) 251-6346

Carmelita Troy
Andrews University
100 Old US 31
Berrien Springs, MI 49104
(**) ***_****

Jim Gilley
3391 Charley Good Road
Thompsonville, IL 62890
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Stan Smith

Lillooet, BC V0K 1V0
Canada
(250) 256-7535 (wk)

Interrogatory No. 2: Describe and identify Your entire educational and employment history to date, including, but not limited to, the name, address and dates of attendance for any high school, trade school, vocational school, technical school, college, university, or other public or private educational provider or institution You attended, the nature and type of coursework You took at the institution, and the type of diploma, certificate, degree, or accreditation, if any, that You received from the institution, the name, address and dates of employment for any paid or volunteer employment position You have undertaken, the job title(s) You had in each employment position, the nature and type of work You performed in each employment position, the name and job title of Your employment supervisor(s) at each employment position, the means by which Your employment in each employment position terminated, the type of license and the licensing agency for any license(s) You were required to maintain for each employment position, and the hourly wage or annual salary for each employment position.

Answer by Defendant Pickle: We recall the following:

River Forest Academy (1977-78)
25 Patricia Dr
Covington, LA 70433
Coursework: Typical 9th grade classes.
Certificate: Typical certificate when completing highest grade that school offered.

never thought of having a written policy. But his practice has been the following: No file should intentionally be deleted unless (a) the hard disk is getting full, (b) the file in question is a temporary or duplicate file, and/or (c) the file does not continue to serve a useful purpose. In that regard, graphic and video files that represent steps toward a finished product may have been deleted once the finished product was completed, since they no longer served a useful purpose.

VERIFICATION BY CERTIFICATION

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

DATED: 9/20, 2007.

/s/ Robert J. Pickle

Robert J. Pickle

Sworn and subscribed to before me this 20th day of September, 2007.

/s/ Deanna M. Zimmerman

Notary Public—Minnesota

Seal

My commission expires on January 31, 2010.