

13 remember any other specific expenses they asked you
14 about?

15 A. Sure.

16 We talked about Abby MacDonald's tuition
17 reimbursement, and they said: "Well, you know, we
18 paid for Abby MacDonald's, you know, tuition," and I
19 said: "Yeah, we talked about it at the compensation
20 committee every year" because the compensation
21 committee, which consists of three or four members
22 of the executive committee, which is Randy Williams,
23 Steve Huston, Jeff Smith and then Robert Williams --
24 I'm sorry -- Robert Jones, would have been in those

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1 conversations.

2 And, again, it shifted throughout the
3 number of years, but that would have been the group
4 of the four of them.

5 I said: "We talked specifically about
6 total comp."

7 I said that Abby -- I think her total
8 salary was \$40,000 a year. The expense
9 reimbursement was, you know, \$10,000 a year for a
10 total of like fifty or fifty-four thousand, whatever
11 it was.

12 I said: "That's what her total comp is,"
13 you know, consisting of forty thousand for this and
14 ten thousand for that."

15 They were like "great." The compensation
16 committee was like: "That's well within the

17 industry norms for a family member to be making, you
18 know, \$50,000 a year essentially."

19 And then I told them: "She's not the
20 only one that we did tuition reimbursement for."

21 I said: There were, you know, several
22 people."

23 I know there were pastors who we've paid
24 for continuing education, for degrees.

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1 Kerri Williams, who was in my department,
2 an accountant, she was a single mom driving from
3 Waukegan. She wanted to get a degree in accounting
4 so she could get a better job.

5 So we -- you know, Dennis Nelson and I
6 set up a plan for tuition reimbursement. Sometimes
7 those checks were cut from the checkbook and
8 sometimes they were cut, you know, through payroll
9 for payroll reimbursement.

10 Q. And so then Abby MacDonald in your
11 opinion wasn't treated different than other people
12 who were similarly situated, correct?

13 A. I would say this. She was not treated --
14 I would say she was treated within the bounds of
15 acceptable treatment as confirmed by the EC
16 compensation committee every year.

17 Q. And then there were other members in
18 leadership that also had a similar benefit for their
19 children that worked at the church?

20 A. Yeah.