

AFFIDAVIT OF OLE ANTHONY

Exhibit A

Deposition of Mario C. Licciardello on the 9th day of December 1998 in US
District Court, Middle District Of Florida, Orlando Division, No: 98-1237-CV-22-A,

A1: cover sheet

A2: page 2

A3-A6: pages 101-104.

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

WORLD OUTREACH CHURCH, INC.,)
a Florida non-profit corporation,)

Plaintiff,)

-vs-

) No:
) 98-1237-CV-22-A

MARIO C. LICCIARDELLO, a/k/a)
MARIO C. LICCARDELLO,)

Defendants,)

CERTIFIED
COPY

* * * * *

The deposition of MARIO C. LICCIARDELLO, taken
on behalf of the Plaintiff before Deborah Tidwell,
Certified Shorthand Reporter in and for the State of
Oklahoma, on the 9th day of December 1998, at 15 East
15th Street, in the City of Tulsa, County of Tulsa,
and State of Oklahoma, pursuant to notice.

* * * * *

AFFIDAVIT OF OLE ANTHONY

Exhibit # A-1

Ole Anthony [Signature]

Notary Public DAB

Appearances:

For the Plaintiff:

DENNIS G. BREWER, SR.
Brewer Brewer Anthony
& Middlebrook
Attorneys at Law
1159 Cottonwood Lane,
Suite 150
Irving, Texas

MICHAEL V. ELSBERRY
Attorney at Law
215 North Eola Drive
Orlando, Florida 32802

For the Defendant:

DENNIS K. BAYER
Attorney at Law
306 South Oceanshore Boulevard
Flagler Beach, Florida 32136

GLENN J. SHRADER, JR.
Walker & Walker
Attorneys at Law
3535 NW 58th Street
Suite 950
Oklahoma City, Oklahoma 73112

S T I P U L A T I O N S

It is stipulated and agreed that all objections, except as to the form of the questions, are reserved to the time of trial with the same force and effect as if made at the taking of this deposition.

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Exhibit # A-2

Ole Anthony [Signature]

Notary Public DAB

1 canceling me, it shows here he is employed again by
 2 -- How can he have control over me through Benny?

3 Q. Well, David Middlebrook told you not to go
 4 to London and you went anyway, didn't you?

5 MR. BAYER: Objection. You can answer the
 6 question.

7 MR. BREWER: Isn't it true?

8 A. Sir, David Middlebrook asked me not to go
 9 to London because he wanted to talk to me but Benny
 10 requested me to go and I was employed by Benny and I
 11 went.

12 Q. (BY MR. BREWER) What was the third sexual
 13 event?

14 A. This one is a tough one. This one I was on
 15 --

16 MR. BREWER: Excuse me just a minute.

17 (RECESS)

18 Q. (BY MR. BREWER) Would you relate the facts
 19 regarding the third sexual event?

20 A. Yes. I was on a bus with Benny Hinn, Steve
 21 Brock, Dave Palmcrest, Cheryl Palmcrest, Jim Senario,
 22 R.J. Larson, Bonnie Highlander and Tom Austin. I
 23 would have to remember all the security men but --

24 Q. When and where?

25 A. We were going from Germany to Holland and

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Exhibit #

A.3

Ole Anthony

Notary Public

1 we were taking a bus and this was just a recent trip
2 that he had. And out of the clear blue sky Benny
3 brings up about a sexual relationship that Paul
4 Crouch had with his chauffeur and I was sitting there
5 and Benny said, "I can't believe Paul Crouch had sex
6 with a black man, his chauffeur, and paid him 600,000
7 and now the guy wants more money. I can't believe
8 that."

9 And we're like -- I'm sitting there and I'm
10 saying, "Benny, why are you telling us this?" And he
11 says, "Well, I have to get ahold of my attorney and
12 find out how I can get away from Paul." And he
13 said -- and it just like -- it made us sick to know
14 that Paul Crouch -- he said, "He told me this in
15 confidence. We were out to dinner at" -- his
16 favorite restaurant down at Newport Beach. I can't
17 think of the name, Camary's or Camalary's or
18 something like that. It's a restaurant down at
19 Newport Beach and they were sitting there and Paul
20 told him what happened. And Paul's defense was that
21 he was drunk. He was drunk on wine and that he had
22 sex with this chauffeur, a black chauffeur, and then
23 Benny tells us all.

24 Q. Benny tells you all what?

25 A. Yeah, about Paul having sex with a black

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DAB

1 chauffeur.

2 Q. When you say "tells you all," how are you
3 using that expression?

4 A. That's exactly what I said. He said that,
5 he came right out and said that.

6 Q. And you believe that Tom Jackson and Carl
7 Smith -- I'm sorry. I'm reading the wrong list.

8 A. No. Tom Jackson wasn't there.

9 Q. Okay. All those people that you mentioned,
10 Bonnie and --

11 A. Bonnie was there, Steve Brock was right
12 there next to him. As a matter of fact him and Steve
13 Brock kept talking about it.

14 Q. Did you feel like WOC or Benny needed to do
15 something about that if that happened and if that was
16 true?

17 A. What made me kind of ill about it is that
18 if Paul told Benny in confidence and then Benny
19 spurted it out to all of us, that's really kind of
20 serious. I mean, I was just kind of shocked. Benny
21 should -- Maybe he told Benny in counseling or maybe
22 he told Benny in a setting that --

23 Q. So were you -- You say you were made sick,
24 did you mean because you felt that Benny was
25 breaching the confidence or because you believed that

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Exhibit # A-5

Ole Anthony [Signature]

Notary Public [Signature]

1 it happened or both?

2 A. Both. It was really -- It was really kind
3 of shocking, you know, when you spend time -- Okay.
4 When you go out to a ministry and you look at these
5 men, and I've given my heart and everything when I
6 started working for Benny Hinn.

7 I mean, I put myself right on the line. I
8 mean, you know, I've been stabbed, I've been shot,
9 I've had incidents happen to me, I've seen deaths,
10 I've seen more things than I can ever condone, but
11 when you put your family first and you put your --
12 you know, that I'm going to go to work for a ministry
13 like Benny Hinn's and you see the people being saved
14 on the platform and then you do this investigation
15 and the corruption and the sexual abuse, the -- I
16 mean, the money laundering, just the things that come
17 out of there.

18 MR. BREWER: I object to the answer as
19 being unresponsive and move it be stricken.

20 THE WITNESS: Well, you're asking me a
21 question, sir.

22 Q. (BY MR. BREWER) No. I asked you a question
23 and you answered it. This is a speech you're making.

24 A. Okay.

25 Q. What is the -- Withdraw the question. You

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[Signature]
[Signature]