



STATE OF MINNESOTA
COUNTY OF SHERBURNE

DISTRICT COURT
TENTH JUDICIAL DISTRICT
Court File No. C4-99-1250

Edward G. Palmer)
Plaintiff)
)
)
vs.)
)
William N. Matthews)
Solid Rock Church, Inc.)
Defendants)

AFFIDAVIT of Karen Vickroy

Being first duly sworn, Karen Vickroy states and deposes as follows:

1. I was a member of Solid Rock Church, Inc., a nonprofit corporation organized under the Minnesota Nonprofit Corporation Act at Minn. Stat. §317A.
2. For a period of time, my husband Kim and I were on staff at Solid Rock Church. Kim was the Minister of Helps and I was in charge of the food ministry.
3. I have personal knowledge of the matters discussed in this affidavit, and if called to testify about them, I could do so competently.
4. I was a member of Solid Rock Church, Inc. during a period of time, which included the July 1, 1993 business meeting.
5. I attended and voted at the July 1, 1993 business meeting.
6. I have examined Plaintiffs' Exhibits 1 in the above-cited case concerning the business meeting of Solid Rock Church, Inc. as held on July 1, 1993.
7. Plaintiffs' Exhibit 1 is the resolution that was presented to the members for voting on at the July 1, 1993 business meeting of Solid Rock Church, Inc.



8. Plaintiffs' Exhibit 1 is the only resolution that was presented to the members for voting on at the July 1, 1993 business meeting of Solid Rock Church, Inc. Notice of the meeting was presented to the members for the sole and exclusive purpose of considering the name change from the Elk River Assembly of God Church to the name of Solid Rock Church, Inc.
9. I originally believed that William N. Matthews was an honest man of integrity that would engage only in truthful activities. I now have a different opinion.
10. While on staff at Solid Rock Church, Mr. William N. Matthews was preparing a parsonage for our family to live in. This was a building directly adjacent to the main sanctuary and office complex. William N. Matthews took a bank mortgage loan out to finish this building into a four-bedroom home for my family to live in. This finishing work was long over due under the building permits from the City of Elk River so there was some degree of pressure from the City to complete it.
11. One of my best friends was Nadine Slis who was Mr. Matthews' secretary. In a personal conversation that Nadine and I were having, Nadine informed me that the proceeds from the bank's mortgage loan which was suppose to finish off our home were used by Mr. Matthews for other purposes. As a result, the home did not get finished until some time later.
12. It is my belief that William N. Matthews engaged in a pattern of lies to the members of Solid Rock Church. As an example, William N. Matthews told the members of the congregation that his youth Pastor Steve Meszaros resigned and left the organization giving no notice. However, I had a personal conversation with Pastor Steve Meszaros and he said Matthews asked him to leave.
13. It is my belief that William N. Matthews engaged in a pattern of slanderous accusations against former members of the organization. As an example, he told



the members of the organization that Yvonne and Ron Hudak were practicing witchcraft and that he had to ask them not to come back to the organization. However, Yvonne and Ron Hudak were Nadine Slis' parents and they were just expressing objection to Matthews sending Nadine and her husband John to Costa Rica.

- 14. Another example of William N. Matthews' lies is that he told the members of the organization that Pastor Tom Stoll resigned to go to another ministry in St. Cloud. However, I talked with Pastor Tom Stoll and he told me that he was forced to leave because he had some differences in opinions with William N. Matthews.
- 15. I believe that William N. Matthews made concerted efforts to eliminate anyone that had a different opinion than his.
- 16. William N. Matthews was a very controlling person to work for. He told my husband and I that we had to be in every meeting that he held. Often, this resulted in regular workweeks of over 70 hours a week because William N. Matthews consistently held meetings on every day of the week. Often two times a day both morning at 10 a.m. and in the evening at 7 p.m.

Further your affiant sayeth not.

Dated: 10.16.99

Signed: Karen Vickroy
Karen Vickroy
222 East Highway 14, #16
Volga, South Dakota 57071

Subscribed and sworn to before me
This 16 day of October 1999.

Kari Konkol
Notary Public

Commission expires Oct-19, 2004



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