

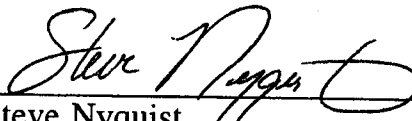


6. Even though I did not attend the business meeting to vote on the name change, I remember that Notice of the meeting was presented to the members for the sole and exclusive purpose of considering the name change from the Elk River Assembly of God Church to the name of Solid Rock Church, Inc. This Notice was posted on the walls of the church for several weeks prior to the meeting.
7. In early 1993, I believed that William N. Matthews was an honest man of integrity that would engage only in truthful activities. Today, I have a different opinion.
8. In the fall of 1993 at an early service, Mr. Matthews asked every one present that fully supported him to come forward for prayer. He asked everyone there to "make a vow to the Lord that you are supportive of me [Matthews]" The context of his statements greatly troubled and offended me and seemed to place the members in a very awkward position with Matthews. I couldn't believe it. Either we stood up and came down for his prayer or we were then being identified as some kind of opposition to his ministry. It was very uncomfortable for others and me. I got up and left the meeting. I later came back for the second service to see if he would repeat his demand. However, Matthews did not present this kind of ultimatum to the members at the second meeting.
9. I was very disturbed and asked for a copy of the tape from the first meeting. When I got the tape, it appeared to have Matthews' discussion erased in that it was barely audible. I placed the tape on a graphic equalizer and was able to get rid of the noise and hear the entire conversation. I have attached a transcript of this tape, which I had other people verify. It is attached as my Exhibit 1.
10. The content of William N. Matthews' message was very disturbing and intimidating to me. My wife and I decided to leave Solid Rock Church and began looking for another organization to worship at.

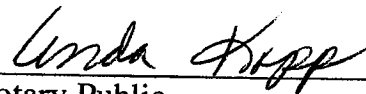
11. Other members had the same concerns and decided to leave. When Matthews was told we were planning to leave, he wanted us out the door immediately. We were teaching Sunday school and asked if we could say goodbye to the kids. At first he refused to let us even say goodbye. Later, while under supervision, we were allowed to say goodbye.
12. Many members appeared to be leaving Matthews' organization. Before we left, I heard Matthews state on one or more occasions that we "were not allowed to talk to any prior members" of the organization. Matthews implemented a "no talk" rule to those who were still attending.
13. I believe that William N. Matthews worked a plan designed to divide the church and eliminate its members.
14. I believe that William N. Matthews systematically stole the Elk River Assembly of God Church.

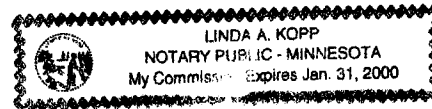
Further your affiant sayeth not.

Dated: 10-19-1999

Signed:   
Steve Nyquist  
18828 146th Street  
Elk River, Minnesota 55330

Subscribed and sworn to before me  
This 19 day of October 1999.

  
Notary Public



Seal

**Pastor Matthews:** "I am going to ask you to stand in just a minute, but I don't want you to stand if you're not one hundred percent supportive of the ministry, because if you stand in the next couple of seconds, God is going to require that of you.....you are making a vow to the Lord that you are supportive of me, of the leadership, and the ministry. It's a very unusual thing to do in a service this morning, but I want you to think about it real carefully. If you feel that you can do that, then I want you to stand and I want you to come up to the alter, and we're going to have prayer together. If you can unreservedly support the ministry, then I want you to do it now."

**Message in tongues**

**Interpretation:** "The Lord God Almighty...it is He and He alone that thou must worship this morning. It is He and He alone that asks for thy dedication. It is He and He alone that asks for thy whole heart and thy whole mind..."

**Pastor Matthews:** "Stop"

**Interpretation:** "It is He and He alone who died on Calvary's cross..."

**Pastor Matthews:** "Play!.....go ahead.....go ahead.....say, Maxine, play! Let's worship Him. This is not what God is saying! It is not what God is saying. I'm sorry Paulette. Nobody is worshipping me. We are making alignment with ministry this morning. I am asking for your support. If you support the ministry, I want you to stand, and I want you to come to the front, and we want to pray together, if you support the ministry. I'm not asking you to worship me. I'm not asking you to worship me, we worship Christ. I'm not asking you to worship me, but if you support this ministry and what this ministry is doing, then make a stand for it now. God is drawing the dividing lines, exactly the same as he did in Exodus chapter thirty-two; exactly the same as He did with Gideon's army...move around here to the front! We're going to pray; we're going to ask God to move. We're going to stop the foul, evil things that are going on...Hallelujah!"