## Deposition of Fred Anderson September 26, 2001

I asked about the information in my letter to the 300 members of MAPC, asking for help for Vernon, and the response in UPDATE Feb. 13, 2000 written by Richard Frey characterizing my letter as untrue. Mr. Rodriguez would not allow me to ask Anderson questions about this letter:

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line 24-25 Q. Do you believe upon the information that you have available to you that this

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line 2 response to Betsy Combier's letter is correct?

Line 3-10 MR.RODRIGUEZ: Again, I am going to object.

The response was written by Richard Frey, the Business Manager. And all due respect to the deposition, I will not allow Mr. Anderson to reply to the correctness of the letter written by another member of the church.

Line 11-25 MS COMBIER: I object to Mr. Rodriguez's characterization.

Excuse me, Mr. Richard Frey is the business manager of Madison Avenue Presbyterian Church. Dr. Fred Anderson is the chief of staff of Madison Avenue Presbyterian Church. Any information which is given to the general membership of Madison Avenue Presbyterian Church concerning information of staff that is sent out to the congregation should Be information that is able to be documented as true because it is written Down and sent to the congregation, and I object to Mr. Rodriguez'

objection

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Line 14-16 Q. What comments did you make about me to other staff members at the church concerning my writing that letter to members?

Line 17-18 A. Simply that you were, I think I said at it again.

Line 19 Q. Could you be more specific, what does that mean?

Line21-22 A. Advocating for people who you perceive to be treated unfairly.

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Line 14 Q. did you ever speak to any member of Session about Betsy Combier and her advocacy for Vernon Martin?

Line 17 A. Yes, I report that regularly

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Line 6-9 Q 940;

So maybe about 400 people are on the active rolls of membership and they do not regularly worship?

Line 10 A. That's probably correct.

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Line 23 Q. How often was my name brought up?

Line 24 A. Your name was not brought up until after your mother's death. We had worked to

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Line 2 keep you on the roll primarily for your mother's sake.

Line 8 Chuck and I had several conversations in which we decided it would not be in your mother's best interest to take your name off the roll.

These conversations are violations of the Book of Order, and when I was thrown out it had nothing to do with my inactivity or activity. My mother did not like Fred Anderson at all, especially after he fired Carol Seaman. When my mom died I asked Charles Amstein to lead the memorial service for her, and not Fred. Fred was furious, and I believe it was mainly this which convinced him, plus the vote for Carol, to throw me out of MAPC membership.

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Line2-10 A. we all cared about your mother.

It was reported to me that you did not want me in the service. And you were told that I was Pastor and as your mother had been on the staff we were going to have a memorial service for her because we loved her and you were welcome to attend if you wanted to. It was another indication of your lack of interest in being a part of the church.

Line 11 Q What was the indication?

Line12-16 A. Your saying that you did not want me, the pastor of the church and head of staff, to be a part of your mother's funeral. It was, you

know, it's become obvious for some time that this was personal.

Line 23 Q. Was my request that you do not head this service an indication that I did not want to participate in the life and worship of

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Line 2 Madison Avenue Presbyterian Church?

Line 3 A. As long as I was pastor, yes.