

IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE

JACK PELHAM and KAY PELHAM,)
)
 Plaintiffs,)
)
 v.) Case No. 05-2259-III
)
 THE NASHVILLE CHURCH, INC.,)
 INTERNATIONAL CHURCHES OF)
 CHRIST, INC., HOPE WORLDWIDE,)
 LTD., and CENTRAL AND SOUTH)
 AMERICA WORLD SECTOR, INC.,)
)
 Defendants.)
)

AFFIDAVIT OF GEOFF FAWCETT

I, Geoff Fawcett, on oath depose and state as follows:

1. My name is Geoff Fawcett. I reside at 2880 Snowflake Drive, Boise, Idaho. I am over the age of eighteen (18) and otherwise competent to provide this affidavit. I have personal knowledge of the matters stated herein. I was formerly employed by the International Churches of Christ, Inc. (ICOC) from the years 1995 to 2000. I served as ICOC's Senior Director of Finance from 1995 to 1997. I served as ICOC's Chief Financial Officer from 1997 to 2000.

2. ICOC is a California religious corporation organized under the Nonprofit Religious Corporation Law of the State of California, whose principal place of business is located in Los Angeles, California. During my tenure at ICOC, ICOC operated as an association or convention for eight separate associations or conventions of churches. These eight associations or conventions of churches were the only entities directly associated with ICOC. None of these eight associations or conventions of churches were headquartered or incorporated in Tennessee. At no time did ICOC offer membership or association agreements to any individual church, including but not limited to

The Nashville Church, Inc., nor to any individual persons, including but not limited to Jack Pelham or Kay Pelham.


3. During my tenure with ICOC, ICOC did not receive any "special missions contribution" funds from any church in Tennessee, including but not limited to The Nashville Church. At no time during my tenure did ICOC ever receive any "special missions contribution" funds from individuals in Tennessee, including but not limited to Jack and Kay Pelham. At no time during my tenure did ICOC ever receive "contributions for the poor" funds from a church or any individual person in Tennessee.

4. During my tenure with ICOC, ICOC never collected "special missions contribution" funds for HOPE *worldwide*, a faith-based nonprofit charity headquartered in Philadelphia, Pennsylvania, from any church or individual in Tennessee.

5. During my tenure with ICOC, ICOC did not solicit or receive any charitable contributions or financial support directly from any church or individual in Tennessee.

FURTHER AFFIANT SAITH NOT.

-- SIGNATURE PAGE FOLLOWS --

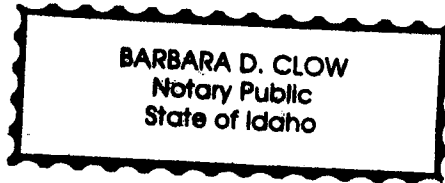


Geoff Fawcett

Sworn and subscribed to me this
16th day of September, 2005.



Notary Public



My commission expires: 6.11.2009