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TIM TAYLOR and
7 ALEX GRENIER

8
9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF TULARE
11 VISALIA DIVISION

12 BOB GRENIER, an individual;
GAYLE GRENIER, an individual;

13 Plaintiffs,

14 vs.

15 TIM TAYLOR, an individual; ALEX
GRENIER, an individual; and DOES 1
16 TO 50;

17 Defendants.

Case No. 249252

DECLARATION OF PAUL GRENIER IN
SUPPORT OF DEFENDANTS' SPECIAL
MOTION TO STRIKE THE COMPLAINT AS
A MERITLESS SLAPP

BY FAX

Date: February 19, 2013
Time: 8:30 a.m.
Department: 7
Judge: Hon. Paul A. Vortmann

Complaint Filed: October 17, 2012

1 being molested by Bob in the shower, he would also administer “spankings” to me. I would be
2 forced to undress and stand in front of him completely naked and trembling. I often remember
3 these episodes taking place in the room furthest away from the master bedroom. This was the
4 room that was occupied by Alex and Geoffrey when they still lived at home. I mention this
5 because there is a mulberry tree that you can clearly see outside the window of this room and to
6 this day I remember the tree always being overgrown and can still visualize the pattern and shape
7 of the leaves because I would focus on the tree when he was abusing me. I do not know why I
8 did this but I just remember looking out the window and staring at the tree and wishing I could
9 sort of fly away like the bird I could see in the tree. Once Bob would have me undress to nudity,
10 he would then have me stand in front of him and had a paddle in his hand. He would prod my
11 penis and testicles with the paddle on some occasions and then on some he would not. It was
12 then customary for me to be forced to turn around and he would stand behind me. He would tell
13 me that I was going to receive a certain number of spankings. Sometimes they were five (5) and
14 sometimes they would go as high as ten. These spankings are not swatting a child on the butt
15 with a pair of underwear and pants covering them. These are the beatings of a grown man
16 standing behind a small child and hitting him with as much force as he possibly could. I was
17 repeatedly told by Bob to bend over and to relax. As humiliating as this is to share, and I am
18 trembling as I write this, I remember Bob would become more angry if he could sense that my
19 buttocks were not in a relaxed state. He would tell me to spread my buttocks apart with my
20 hands and he would take the paddle and touch my anus with it and prod and poke me with his
21 fingers as well. After this portion was done, Bob would then proceed to start the “spankings.”
22 All I remember once the violent beatings started is that if you cried, moved, flinched, or did not
23 remain in a relaxed state while you are literally having someone beat you with a wooden paddle
24 as hard as they could, you would receive more. Bob was so sadistic in the way he would do this.
25 He would use a baseball analogy that he was “winding up” and he would touch me gently with
26 the paddle and then would “wind up” again and sometimes this would go on for three or four
27 “wind ups” before he would hit me as hard as he could. I never knew what to expect or when
28 they were coming and it to this day is one of the most terrifying experiences of my life. I have

1 probably thrown up three times while writing this portion of my declaration. It is that upsetting
2 to me even at thirty-one years old. Once he began his beatings with the paddle, I would be
3 forced to count out loud the number I was to receive and if I moved or cried, then more would be
4 administered. During this time, I know I was being touched by him inappropriately between the
5 beatings and that he would prod my anus with his fingers and the paddles and I could not tell if
6 he was sexually aroused or not because he was behind me and I was in so much pain. I just
7 remember looking at that mulberry tree and the birds sitting on it wishing I could fly away.
8 These episodes occurred frequently over the course of the next five years until I was
9 approximately ten years old. After these episodes of sexual and physical abuse, Bob would sit
10 down on the bed next to me and say that the holy bible commanded him to do these things and
11 that it was my fault forcing him to have to take such action. He would then pray with me and
12 have me ask god to forgive me for my actions and then I would have to thank him for
13 “disciplining” me and being a responsible parent. Sickeningly, I would then have to hug him
14 and tell him I loved him and that he was a good pastor.

15 5. During the time-frame Robert is referring to regarding his knowledge or lack
16 thereof of my being molested by Bob, I had not told anyone, including Alex and Robert, that
17 Bob had done such an evil and horrific thing to me. The only people I had confided to in privacy
18 at that point, were Alex’s wife Amy Joye (Amy), and a personal friend, C.D. Harbottle. These
19 are scars I have to live with my entire life and while it may sound odd, it is difficult for me to
20 speak with any of my brothers regarding this horrific time in my life. To this day, I still have a
21 difficult time talking to Alex about it because of the shame and humiliation I still feel at thirty-
22 one years old.

23 6. As an adult, that has struggled with these awful memories for the majority of my
24 adult life, I can tell you that I became very good at hiding what I was feeling. I never told
25 anyone for fear of what would happen to me, my brothers, and Gayle. To this day, one of the
26 things that haunts me the most, is that I knew if I told Gayle, she would defend Bob and he would
27 tell her I was possessed or this was the work of satan and I would be banished the same way my
28 brother Geoffrey was from our home when he was approximately fifteen or sixteen. I saw how

1 she would run and hide when Bob would beat Alex and Geoffrey and I knew if I told her what
2 Bob was doing to me that she would not believe me either. I knew this because Gayle would not
3 do anything to stop what she saw him doing. I could not imagine what she would do if I told her
4 what Bob was doing to me and it would just be my word against his. I felt trapped. I never told
5 anyone until I was an adult because Bob always got away with everything and nobody ever
6 stopped him.

7 7. Further, I was not sure that I ever wanted anyone to know these things that had
8 happened to me. I had told my sister-in-law, Amy, and C.D. Harbottle, my close friend, that Bob
9 had molested me. Until today, other than C.D. Harbottle knowing the specifics of the sexual
10 abuse I have never went into this kind of detail.

11 8. Bob accurately states the criminal case against him for physical child abuse was
12 closed after Alex and I made reports to the Visalia Police Department (VPD) in 2010. I met in
13 private with Chief of Police, Colleen Mestas, during that time to discuss the difficulty I was
14 having in obtaining a copy of the police report. Chief Mestas and I discussed the abuse at length
15 and she asked me if there were any other types of abuse such as sexual abuse that occurred. She
16 cautioned me to answer carefully because she is a mandatory reporter. I intimated to Chief
17 Mestas that there was other abuse that was outside the category of physical and emotional abuse
18 and that I was not ready to disclose it at this time because I did not want to be victimized all over
19 again as I felt I had been when the criminal complaint for physical child abuse was filed against
20 Bob. I found Chief Mestas to be a very concerned and compassionate officer of the law and we
21 even spoke on the telephone later that week as she wanted to see how I was doing. In hindsight,
22 I always believed Bob had the VPD in his back pocket because of his connections to the
23 chaplain program. However, I believe that had I filed a criminal charge that day against Bob for
24 molesting me that Chief Mestas would have ensured the investigation would not be
25 compromised.

26 9. I met with an attorney, Kelly Clark, along with Alex and Amy in October of 2010,
27 in Portland, Oregon. I believe it was late October. We consulted with Clark to determine what
28 our rights and legal options were with regard to Bob's abuse. This would be the first time I

1 spoke of the sexual abuse in front of Alex. Alex heard part of it and then got up and left the
2 room because he was upset.

3 10. Approximately, two months ago, I was contacted by an Ada County Sheriff's
4 Investigator from Idaho and I had to recount in similar detail to her what had transpired in our
5 home. This interview was part of an investigation that resulted from Bob's efforts to have Alex
6 charged with criminal libel in Idaho. As you can imagine the last couple of months have been
7 difficult as I would like to move forward with my life but am constantly having to look back. It
8 is very painful.

9 11. I gave Alex permission to post my statement on calvarychapelabuse.com regarding
10 Bob molesting me on or about April 5, 2011. A true copy of that post is attached to Alex's first
11 declaration as Exhibit A.

12 **Domestic and Child Abuse**

13 12. Alex has told the truth about all of the abuses that occurred in our home.

14 13. When I was at the approximate age of seven, after Geoffrey had been forced to
15 leave our home, Gayle was so distraught that she and Bob were arguing over Bob's not allowing
16 Gayle to have contact with her biological child. I remember this was in the early morning and
17 Gayle was in tears and Bob was yelling and screaming at her in their bedroom at the back of our
18 home. This was not an uncommon occurrence. My bedroom shared an adjoining wall to theirs
19 and I could often hear Bob berating Gayle and forcing her through mental abuse to give into his
20 demands. I bring up this particular instance of abuse because to this day it stands out in my mind
21 as a real changing point in Gayle's behavior moving forward from the time I was approximately
22 six years old. I remember Gayle picking up the telephone to try and reach Geoffrey who was
23 living in Baltimore with his biological father and stepmother. Bob became so enraged that
24 Gayle was "disobeying" him that proceeded to grab her and throw her on their bed wherein he
25 got on top of her and put his arms around her neck and choked her and was screaming at her that
26 a Christian wife must submit to her husband. I was on the floor on my hands and knees
27 watching Bob assault her as I peeked my head around the corner of their open bedroom door.
28 From that moment on, I saw a complete and radical change in Gayle's behavior. She became

1 withdrawn, often spending hours on end sleeping in her bed during the day and seemed unable to
2 cope with what was going on around her. I would best describe her behavior today as some sort
3 of coping mechanism wherein she disassociated herself from the abuse that was occurring in our
4 home. She became what I can only describe as a shell of the person I remember her being when
5 I was a child to the last time I saw her which was approximately seven years ago at a grocery
6 store in Visalia, California. I mention this because I saw her and said hello and she had a blank
7 look on her face and even after identifying myself as her son, Gayle stared, confused and turned
8 around and walked the other way. It was almost as if she had no idea what was occurring. This
9 is very similar to the behavior she exhibited while I was growing up.

10 14. I was also physically abused by Bob in addition to him sexually abusing me.
11 These episodes of physical abuse occurred so often that it would be impossible for me to count
12 the number of times these occurred. One of my first memories of Bob physically abusing me
13 started when I was approximately 5 years old. Bob would often have me stand in front of him
14 while he yelled and screamed obscenities at me. He would force me to put my hands behind my
15 back and stand facing him. During these tirades Bob would taunt me that he was not going to hit
16 me and would force me to step forward to him where he would continue taunting that he was not
17 going to hit me, telling me not to be afraid and then he would raise his hand and hit me in the
18 face as hard as he could. These instances occurred many, many times over the course of my
19 childhood. Another form of his cruel abuse that stands out to me as being particularly cruel and
20 humiliating is that Bob would have me go into our backyard and pick a "switch" as he called it.
21 A "switch" was a thin branch that I would be forced to pick off of a lavender bush in our
22 backyard. After picking this out for Bob he would take me in the same room where he molested
23 me and have me strip naked and would proceed to whip me with this thin branch sometimes as
24 many as ten times with him whipping me as hard as he could. He would leave welt marks all
25 over my back, buttocks, and the back of my legs. I can still hear the sound the branch made as it
26 hit my skin. This was one of the more excruciatingly painful instances of physical abuse he
27 would employ.

28 15. I personally witnessed Bob physically assault Robert on innumerable occasions. I

1 am twenty months older than Robert, and I have seen Bob physically strike Robert in the face,
2 buttocks, back, and legs to the point that Robert was so terrified he would urinate his pants.
3 These instances occurred in our home on so many occasions that it would be difficult to count
4 the number of times this happened, however, from the age of five years old and on, this was a
5 weekly occurrence in our home.

6 16. Bob was especially physically abusive toward Geoffrey. I always remember Bob
7 being unusually violent toward him. I actually cannot remember a day in our home where Bob
8 did not either hit Geoffrey or mentally and verbally abuse him for hours on end. If I had to
9 estimate on average how many times per week Bob physically abused Geoffrey I would say that
10 it was upwards of at least 4 times per week. There are 3 instances of Bob's abuse of Geoffrey
11 that I would like to address. I would like to address these because they stand out to me as being
12 extremely disturbing and violent. In addition to Geoffrey being hit in the face, whipped,
13 spanked, punched, and kicked on a weekly basis, I remember looking outside of my bedroom
14 window on a Saturday afternoon and watching Bob hit Geoffrey in the face as he was screaming
15 and yelling. At one point I remember Geoffrey had fallen to the ground and there was a stack of
16 firewood against the fence and Bob proceeded to pick up this piece of firewood and hit Geoffrey
17 in the head, back, legs, arms, and buttocks. I still remember Geoffrey just lying on the ground as
18 Bob mercilessly assaulted him. I can tell you this instance stands out to me because I remember
19 thinking Bob would kill Geoffrey. The second episode I would like to address involved Bob
20 locking Geoffrey in a coat closet that was right outside of our kitchen. This closet was no more
21 than by 3 feet wide at most and approximately 8 feet in height. Bob forced Geoffrey into the
22 closet wherein there was no light and closed the door on Geoffrey. I cannot remember the exact
23 amount of time Geoffrey was locked in this small closet but it was upwards of at least 4 hours. I
24 remember hearing Geoffrey crying from the closet asking Bob to let him out. I found out years
25 later that a congregant had heard this story on the internet because Alex remembers Bob locking
26 Geoffrey in the closet and the congregant shared with Alex that Bob and Gayle had taken them
27 into their home to show the congregant that there was no closet next to their kitchen so that we
28 must be lying. Bob and Gayle had remodeled the inside of their home and had dry walled over

1 the closet and used the fact that there was no longer a closet there as a means to label Alex a liar.
2 I cannot find the switches and paddle Bob would assault me with, but it does not negate the fact
3 that Bob assaulted me. I mention this because Bob is a master manipulator and deceiver and will
4 go to any lengths to cover up what he has done. The third instance that I vividly remember
5 involved Bob assaulting Geoffrey near the front door of our home. This was actually the catalyst
6 for Geoffrey being kicked out of our home. Bob was yelling and screaming at Geoffrey and I
7 remember Bob raising his fist and punching Geoffrey with a closed fist in the face as hard as he
8 could. Geoffrey could not have been more than 15 or 16 at the time. I think it must have scared
9 Bob at how hard he punched Geoffrey because Bob immediately banished Geoffrey from the
10 home and told us that Geoffrey caused him to "lose his temper" and that he could no longer live
11 with us. There was and still appears to be today, by Bob's filing of this defamation action, a
12 complete and utter lack of taking responsibility for his actions. Bob blames everyone else for his
13 actions whether it be that a 5 year old made him angry, a 15 year old did not do a task exactly as
14 he described, or in present day, that Alex has re-told these instances of abuse that Bob
15 committed, it is always someone else's fault. Bob has never shown any mercy toward me, Alex,
16 and Geoffrey, in contrast, people treat their animals better than Bob treated us, yet once again
17 Bob is the victim in this matter. The only thing Bob is a victim of is his own actions. Bob is
18 angry he cannot intimidate us into silence any longer. Those days are long over and the scared
19 children Bob abused now have a voice and are grown men and are well within their right to
20 share what we endured. If Bob did not want to be labeled a child abuser and a child molester;
21 my advice would have been not to engage in those actions toward children.

22 17. Bob would also physically, mentally and verbally abuse Alex on what I recall as a
23 daily or semi-daily basis. I can tell you that Bob was always targeting someone in our home. It
24 may not have been the same child everyday but there is not a day in our home I can recall where
25 one of us was not being hit, beat, screamed at or yelled at for hours on end. Much of the
26 physical abuse I describe pertaining to me, I also witnessed Bob committing against Alex. Alex
27 was frequently hit in the face by Bob with brute force. Alex was also whipped with these thin,
28 switch-like branches from our backyard. On one occasion I remember Bob had Alex and

1 Geoffrey stand next to each other where they were forced to take their shirts, pants and
2 underwear off and bend over the bed in their room. They were literally standing right next to
3 each other. Bob then took one of these switches that was unusually long and whipped them both
4 at the same time. Hitting them anywhere he could on their bodies. Because Bob would have us
5 count how many times we were being spanked or whipped I remember this vividly because the
6 count had gone past 20. I also remember Alex being in so much pain and crying, and I do not
7 say this to embarrass him, but Alex had urinated during one of these beatings because I
8 remember there being a large wet spot on the floor in his room after this particular beating. Bob
9 would not physically abuse us with the bedroom door shut. He would leave it wide open for the
10 entire home to hear. During this time where Bob was literally whipping Alex and Geoffrey to
11 the point there were oozing and bleeding welts on their buttocks, I can still remember the
12 screams coming from them. I would often crawl on the floor and peek around the corner to see
13 what Bob was doing. I do not know why I would do this but I always remember thinking Bob
14 was going to kill one of us because he would be in such a rage. In hindsight, maybe I was
15 watching to see if Bob sexually abused Alex and Geoffrey in the same way he had done to me. I
16 remember Alex being a particularly insecure adolescent in the sense that Alex had a strong
17 desire to please people and I would describe him as a peace-maker. I think Alex being the eldest
18 sibling felt like he had to hold it together for his younger brothers and for Gayle. Alex would
19 often try to stop Bob from hitting Geoffrey and then Alex would bear the brunt of Bob's abuse
20 for intervening. I always felt bad for Alex because he would try to stop Bob from assaulting
21 Geoffrey and then would be assaulted himself for trying to protect his younger brother. Again,
22 Bob would tell Alex and Geoffrey that these beatings occurred because they had caused him to
23 lose his temper. Bob has never taken responsibility for any of his actions; again it is always
24 someone else's fault that he lost his temper. I suppose it is my fault that at 5 years old he
25 decided to sexually abuse me. Bob is the penultimate victim in every situation.

26 18. I was never physically or sexually abused by Gayle. However, she was aware of
27 the child abuse that was occurring in our home. I believe Gayle was so terrified of the violence
28 she saw in Bob that she felt she had nowhere to turn and did not know what to do to help us

1 escape this daily hell we lived in. Bob would often comment on the fact that Gayle never
2 finished High School and did not even have a High School diploma. He would also daily remind
3 all of us that he was the sole provider for our household and that none of us could survive
4 without him. As an adult, it is so clear to me now that his tactics were used to silence and
5 intimidate her as well as the rest of us in an effort to maintain absolute and complete control over
6 the family unit. I remember Gayle during the times Alex and Geoffrey were being abused going
7 into her bathroom that adjoined to the bedroom she shared with Bob, where she would drink
8 wine and take pills that she had hidden under the vanity sink. I can best describe Gayle's
9 behavior during these episodes of abuse as someone that would literally lock herself in the
10 bathroom, self-medicate, cry and put her fingers in her ears so as not to hear what was going and
11 the screams of help coming from her children. I often felt torn as to whether I should try and
12 help my brothers or go to comfort Gayle. I never knew what was the right thing to do or who I
13 should try and help. I was so scared of Bob that I would try and avoid him as much as possible
14 during these long and drawn out episodes of abuse that I would try and comfort Gayle or play
15 board games with Robert in our bedroom so as not to have to deal with what was happening
16 right outside our door. I still struggle with feelings of guilt for not trying to help Alex and
17 Geoffrey during these times, but as a young child where you are being threatened that if you tell
18 the truth that you will be put in foster care and that I would never see my family again, a child at
19 that age does not have the mental capacity of how to process these things. I now can place the
20 blame squarely on Bob as he ruined many lives and has caused many years of emotional and
21 physical pain for me, Alex, Geoffrey, Robert and Gayle.

22 19. I would like to take this opportunity to state that I believe Gayle is projecting her
23 fears of Bob onto Alex. I believe Robert and Gayle are as much victims of Bob's violence as
24 Alex, Geoffrey, and me. While I do not believe Robert and Gayle's accounts of there being no
25 abuse in our home are true, I believe they both are suffering from some inability to come to
26 terms with the abuse they endured at the hands of Bob. It is again, my hope, that Gayle, will find
27 the strength and determination to break this cycle of violence and receive counseling and therapy
28 so that she too can live a normal and happy life. I believe all humans are entitled to that basic

1 right and I am deeply saddened that she feels she has no option other than to stay and cover for a
2 child molester and child abuser. I cannot imagine the toll that must take on her daily. However,
3 it is not uncommon as we know, for the victims and spouses of the perpetrators to cover for
4 them.

5 20. While I was not present for every visit Gayle had with my niece, Ashley Joye
6 (Ashley), I do agree that it is Gayle that terminated her relationship with Alex and Ashley. I
7 believe she was forced to do so by Bob. I believe this to be true because her mother, my
8 grandmother, the late Ruth Folkert (Ruth), told me that Bob had forced her to cut ties with Alex
9 and his daughter and that anything less was unacceptable. Ruth was living with Bob and Gayle
10 at this time. Ruth and I would communicate privately as she told me on a number of occasions
11 that if Bob found out she was talking to me she would be kicked out of their home and she
12 emphatically stated she was scared of the consequences of his finding out about her speaking
13 with me. Ruth also had a similar conversation with my sister-in-law, Amy, wherein Ruth
14 repeated similar statements about her fear of Bob and the consequences she would suffer if he
15 were to become aware of her private communications with us.

16 21. I deny Gayle's allegations that Alex has a short temper and a history of violence. I
17 have never witnessed Alex physically harm anyone in fact I know him to be a loving, gentle, and
18 caring person. I know this to be true because of the way he has cared for me over the course of
19 my life and because of the way I have seen him interact with his children and his wife, Amy. I
20 have never heard Alex speak of Gayle in any terms other than it "breaks his heart" that his
21 mother is trapped in an awful situation.

22 **Abuse of CCV Staff and Members**

23 22. There have been many people that have attended and then left CCV over the past
24 thirty-five years. I believe people leaves churches for a number of reasons. However, Bob, is
25 unusual in the Visalia church circuit as he has a reputation for "burning and churning" through
26 congregants over the years. Further, when people leave his church, he will then go to other
27 churches and meet with their pastors and slander and malign the people that have left his church
28 and "warn" these pastors of the evil ways of the wayward congregants who have left. Bob's

1 entire operation is very cult-like in his approach. There is either absolute loyalty to him or you
2 are out. I have personally witnessed him meet with pastors of other churches and character
3 assassinate people who have left his church. It is for this very reason that many friends of people
4 who left CCV found out about Bob's actions and were so disgusted they left the church because
5 of these reasons. Bob has nobody but himself to blame for people leaving his church and I'm
6 not sure why the last five years would be any different than people leaving in the prior thirty
7 years. Bob is viewed in a negative light by scores of people and has been for as long as I can
8 remember. Growing up, I never heard anyone that did not attend CCV have a kind word to say
9 about Bob. His poor reputation precedes him and has for a very long time.

10 23. I have witnessed Bob threaten and intimidate his staff numerous times over the
11 years. I also have firsthand knowledge, along with Amy, that Bob and Gayle, along with Greg
12 and Susie Dowds, secretly tape recorded, private counseling sessions with two couples who were
13 attendees at CCV without their knowledge. Amy and I listened to these tapes. And Bob, Gayle,
14 Greg and Susie would sit and play the tapes and listen to them in the living room of our home.
15 This happened on at least a dozen occasions.

16 24. I have shared with Alex all of the accounts I mention of Bob intimidating and
17 abusing his staff.

18 **Financial Abuses**

19 25. Bob has complete and total control over the finances of the church. I grew up
20 watching Bob and Gayle use the church credit card to eat out at restaurants, travel, buy clothing,
21 and make whatever other purchases they deemed necessary using church funds. Further, when
22 Bob would travel to speak at an out of town church, he would receive what he referred to as a
23 check or an "honorarium" for his speaking services. While CCV was funding these trips which
24 only involved Bob speaking on a Sunday morning and traveling back home (nothing longer than
25 four hour drive by vehicle), Bob would check into a hotel on a Friday evening and stay until
26 Monday morning and then would return to Visalia. Additionally, instead of Bob using the
27 monies he was paid for speaking at these out of town churches to reimburse CCV for his travel
28 expenses, these checks would be deposited into his personal checking account. I am sure if

1 Sciacca & Company did an audit of Bob's personal finances over the last 30 years they would
2 find numerous deposits he made into his personal checking account wherein he was paid for his
3 speaking services.

4 26. Bob and Gayle frequently took cash that was in an envelope handed to them by
5 either the bookkeeper or Jim Souza, an Assistant Pastor. Bob and Gayle would use this cash
6 they referred to as "petty cash" for whatever expenditures he wanted, frequently for personal
7 expenses. This cash would be used for anything they wanted to purchase and the amount would
8 range anywhere from \$500 to \$1000 depending on whatever they requested. This was a
9 common practice on any trip they went on, local or international. They started using cash after
10 1993 or 1994, I believe because of issues Bob had with the CCV board of credit card
11 transactions the board felt were not true and legitimate expenses. These issues of financial abuse
12 were brought to the board's attention by Bryan Prosser, Hank Kampen, and Glick Callahan.

13 27. I also shared my accounts of Bob's financial abuse with Alex.

14 **Bob's Involvement In Public Affairs/Controversies**

15 28. Bob's allegations that he does not interject himself in to public controversy are not
16 true. Bob played an active role in being a chaplain for the Visalia Police Department (VPD),
17 Tulare County Sheriff's Department (TCSD), organizing and hosting the Annual Visalia
18 Mayor's Prayer Breakfast, giving the opening prayer at Visalia City Council Meetings, as well as
19 playing an active role in organizing and calculating the running out of town a religious group
20 called, "Set Free Ministries" which was led by Phil Aguilar. Bob was also actively involved in
21 raising money for and campaigning from the pulpit for the election and subsequent re-elections
22 of Sheriff Bill Whitman. Sheriff Whitman would also speak at CCV, along with the Chief of
23 Police, Bruce McDermott, and his successor, Jerry Barker. Bob has done nothing but involve
24 himself in relationships with local law enforcement officials, and Sheriff Bill Whitman even
25 went so far as to defend Bob in an article in the Fresno Bee approximately two years ago,
26 attesting to his moral fitness and being of good character when the article at hand dealt with the
27 issue of Bob being a child abuser.

28 29. Bob's entire stance on moral and doctrinal issues as they relate to the holy bible is

1 that he is an expert. He repeatedly has held himself out to be an expert on these topics.
2 Frequently over the years, Bob has spoken out from the pulpit on political issues such as
3 abortion, gay rights, gay marriage, and which politicians he believes his congregation should
4 vote for. His entire public persona is wrapped up in controversy and taking a stand for what he
5 believes in so any statement to the contrary that he avoids public scrutiny is absolutely false.
6 Further, Bob most recently gave an interview with Lewis Griswold of the Fresno Bee wherein he
7 spoke freely about why he propounded this lawsuit in the first place.

8 **Tim Taylor**

9 30. I first began speaking to Tim Taylor on or about August of 2009. I can't
10 remember the exact date but we started communicating after the blog on Topix.com started in
11 June of 2009. I was alerted to that blog by Amy, my sister-in-law who came across it on Google.
12 My recollection of how Tim and I started communicating is that he posted a generic email
13 address if people wanted to get in touch with him and that is how I came in to contact with him.

14 31. After I established a level of trust with Tim Taylor, I shared much with him. We
15 spoke about the abuse of Alex and Geoffrey, the abuse of church members, financial abuse, as
16 well as the physical and sexual abuse that I endured. I told Tim I was sexually abused by Bob
17 but did not go into specific detail.

18 **Conclusion**

19 32. In January 2002, Bob and Gayle did celebrate their 25th Wedding Anniversary and
20 there was a "party" at CCV. I did stand up and say that Bob and Gayle were good parents and I
21 remember saying a number of other pleasantries about their marriage and them as individuals.
22 My reasons for doing so are two-fold: first, I had no choice but to participate in these charades
23 that Bob would arrange to blatantly self-promote himself and force our family to give the
24 appearance to the congregation and the public that we were a happy, normal, and functioning
25 family unit; second, I did not look at this anniversary party as any different than being forced to
26 attend mandatory public, religious and civic events in Visalia and other locations with Bob and
27 Gayle to keep up the appearance that our family unit was intact and functioning normally. It was
28 a common practice for me during these public appearances to have a glass of wine, take a

1 | Xanax, and slap on a smile to keep up the charade all the while knowing that I was standing
2 | there saying nice things about the man who molested and violently physically assaulted me.

3 | 33. Bob has nobody but himself to blame for his poor reputation. Actions have
4 | consequences and the truth always has a way of coming out. Even Bob's own pastor, Chuck
5 | Smith, Senior Pastor of Calvary Chapel Costa Mesa, has told me on the phone how very sorry he
6 | is for what I have gone through and that he wishes Bob would just stop all of this "lawsuit
7 | nonsense." Pastor Dave Rolph, Senior Pastor of Calvary Chapel Aliso Viejo, has spoken to me
8 | on a number of occasions and expressed his deepest sympathies and sorrow for what I am being
9 | put through because of this lawsuit that Bob has filed against Alex. I agree that Bob's reputation
10 | has been tarnished, but one must ask themselves who is to blame for that? That blame falls
11 | squarely on Bob's shoulders for the crimes he has committed against me and my two older half-
12 | brothers.

13 |
14 | I declare under penalty on perjury under the laws of the State of California that the
15 | foregoing is true and correct.

16 |
17 | Dated: February 8, 2013


Paul Grenier