

NO. CV-11-1349

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SHARENA GILLILAND DISTRICT CLERK
PARKER COUNTY, TEXAS
EM DEPUTY

WALLBUILDER PRESENTATIONS, INC. §
THROUGH §
ITS PRESIDENT, DAVID BARTON §
and §
WALLBUILDERS, L.L.C. §
THROUGH §
ITS PRESIDENT, DAVID BARTON §
and §
DAVID BARTON, INDIVIDUALLY §

IN THE DISTRICT COURT

Plaintiffs

PARKER COUNTY, TEXAS

vs.

W. S. SMITH,
and
JUDY A. JENNINGS,
and
REBECCA E. BELL-METEREAU

415TH JUDICIAL DISTRICT

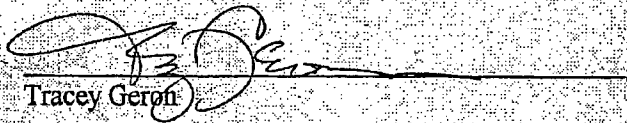
Defendants

BUSINESS RECORDS AFFIDAVIT OF TRACEY GERON

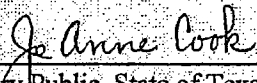
BEFORE ME, the undersigned authority, personally appeared Tracey Geron, who being duly sworn, deposed as follows:

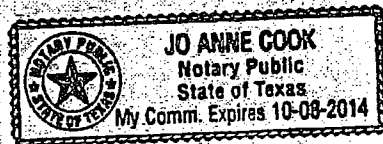
1. "My name is Tracey Geron. I am at least 18 years of age, of sound mind, have never been convicted of a felony and am fully competent and qualified to give this affidavit. I am personally acquainted with the facts alleged herein. I hereby swear that the following statements are true and correct."
2. "I am the Finance & Customer Service Manager of Wallbuilder Presentations, Inc. and the Finance & Customer Service Manager of WallBuilders, L.L.C. The business location and county of residence are matters of record in this case."

3. "I am also a custodian of records for Wallbuilder Presentations, Inc and WallBuilders, L.L.C. Attached hereto are 5 pages of records from for each of these two business entities. These said 5 pages of records are kept by for each of these two business entities in the regular course of business, and it was the regular course of business of for each of these two business entities for an employee or representative of each, with knowledge of the act, event, condition, opinion, or other data recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. The records attached hereto are the original or are exact duplicates of the original."


Tracey Geron

by **SUBSCRIBED AND SWORN TO BEFORE ME** on the 4th day of January, 2012
~~December, 2011;~~


Notary Public, State of Texas



WallBuilder Presentations

	2009	2010	2011
Income from Non-Profit Sales	\$ 15,447.36	\$ 2,639.17	\$ 20,747.37
Income from Non-Profit Travel	\$ 2,850.00	\$ 5,950.00	\$ 5,100.00
Income from Contributions	\$ 740,802.05	\$ 768,861.19	\$ 935,027.20
Income from Designated Contributions	\$ 162,781.40	\$ 181,502.10	\$ 149,934.93
Honorarium - David Barton	\$ 131,670.18	\$ 160,043.01	\$ 142,260.49
Honorarium - Contract Speakers	\$ 9,369.56	\$ 17,271.70	\$ 14,416.27
TOTAL INCOME	\$ 1,062,920.55	\$ 1,136,267.17	\$ 1,267,486.26

WallBuilders LLC

	2009	2010	2011	2010 w/GBeck	2011 w/GBeck
Texas Sales	\$ 84,548.89	\$ 175,329.65	\$ 168,644.89		
Out of State	\$ 847,034.62	\$ 1,278,705.15	\$ 1,109,433.09	\$ 1,727,956.39	\$ 1,138,486.38
TOTAL INCOME	\$ 931,583.51	\$ 1,454,034.80	\$ 1,278,077.98	\$ 1,727,956.39	\$ 1,138,486.38

Presentation Data for David Barton 2009

Television
22

Radio
165

Church
24

Conference
61

Political
17

Capitol Tours
14

Written Media
3

College/University
10

Other
54

Total
370

2009 States (24)

Arizona, Arkansas, California, Colorado, Florida, Georgia, Hawaii, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maryland, Missouri, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, South Dakota, Tennessee, Texas, Virginia, District of Columbia

2009 Countries (1)

Mexico

**Presentation Data for David Barton
2010 (Jan 1 – Dec 31)**

Television
48

Radio
140

Church
48

Conference
77

Political
21

Capitol Tours
9

Written Media
10

College/University
4

Other
64

Total
422

2010 States (27)

Arizona, Arkansas, California, Colorado, Florida, Georgia, Hawaii, Iowa, Kentucky, Maryland, Massachusetts, Michigan, Mississippi, Missouri, New Hampshire, New York, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, District of Columbia

Presentation Data for David Barton 2011 (Jan 1 – Dec 31)

Television
38

Radio
181

Church
45

Conference
58

Political
6

Capitol Tours
7

Written Media
2

College/University
6

Other
77

Total
420

2011 States (23):

Alabama, Alaska, Arizona, California, Connecticut, Florida, Georgia, Hawaii, Iowa, Michigan, Mississippi, Missouri, New Mexico, New York, Ohio, Oklahoma, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, District of Columbia

2011 Countries (2):

Israel (3 times), South Africa