

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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JEREMIAH BURKE, <i>et al.</i> ,)	
)	
Plaintiffs)	Case No. CL-2022-12576
v.)	
)	
MCLEAN BIBLE CHURCH,)	
)	
Defendant.)	
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AFFIDAVIT OF CRAIG PROULX

1. My name is Craig Proulx, and I am over eighteen years of age.
2. I became a member of McLean Bible Church (“the Church”) in the year 1980 and continued as a member until the year 2020. During my time as a member, I was active in the Church affairs, including in its leadership.
3. On or about 1996, the congregation elected me as a member of the Board of Elders, which is the lay leadership of the Church.
4. Sometime between the years 1998 and 1999, I became the Treasurer of the Board of Elders. One of my responsibilities as the Treasurer was to review and sign the Church’s expense checks, since the church staff was not allowed to sign any check.
5. Beginning sometime around 2016, the Church began using a system of electronic funds transfer (named “Concur”) for its financial transactions. From that time forward, I would receive email requests to sign off on the Church’s electronic checks.
6. Starting in the year of 2017, I began receiving requests to sign Church checks made payable to “the Southern Baptist Convention” or similarly-named entities.

7. Such checks were relatively large in amount, such as five thousand dollars (\$5,000.00), ten thousand dollars (\$10,000.00), or even fifty thousand dollars (\$50,000.00). The memo line and the backup information for such checks were blank. Nor was there an attached invoice and, therefore, I did not know the reasons why these checks were written.

8. I communicated with two individuals at the Church to address my concerns about signing these checks, which lacked any explanation. The two individuals I spoke with were Larry Cooper and Bill Steele.

9. Larry Cooper was the Chairman of the Board of Elders at that time. He provided no explanation and instead told me "don't worry about it."

10. Bill Steele was the Director of Central Operations and Finance at the Church and a paid employee. He explained that the checks reflected the Church's contributions to "New City Network," an organization chartered by the Southern Baptist Convention for church planting. I was told that similar checks were coming into McLean Bible Church from the Southern Baptist Conventions and being funneled back to New City Network for church planting.

11. I never saw evidence of any checks from the Southern Baptist Convention to the Church and, to this date, I have no evidence of that.

12. I left the Church in October 2020 when I retired and moved out of state. At that time, I also resigned from my position as a member of the Board of Elders and Treasurer.

13. Between the years of 2017 to 2020, I estimate the total amount of all checks the Church issued payable to Southern Baptist Convention and its affiliates such as New City Network to be approximately five-hundred thousand dollars (\$500,000.00).

14. To my knowledge, the Church did not make any disclosure or announcement to its members relating to its affiliation with Southern Baptist Convention or transfer of the funds.

I, Craig Proulx, hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1 day of March, 2023.

Craig Proulx
Craig Proulx

STATE OF North Carolina :
COUNTY OF Pender :

The foregoing instrument was subscribed and sworn before me this 1 day of March 2023 by Craig Proulx.

Theresa S Freer
Notary Public

My commission expires: March 7, 2024

