

AUG 4, 2018 – This copy was transcribed “*best as possible*” from a photo-copy of the hand-written motion written in jail on Oct 25, 2017, and from Defendant’s memory on a few words which were excluded from the photo-copy.

In The Criminal Court For Davidson County Tennessee
At Nashville

State of Tennessee

Assigning - Unknown - (Judge Seth
(Norman

vs.

Willie Austin Davis,
Defendant

Case # - 2017-A-62

MOTION FOR MISTRIAL AND NEW TRIAL

Comes the incarcerated pro se Defendant, at disadvantage without access to info or better resources to write a motion, to request a mistrial based upon Article VI Section 11 of the Tennessee Constitution, which guarantees a Defendant, that no Tennessee Judge will preside over any case if there is a conflict of interest with individuals, or blood-kin, which is not disclosed to the Defendant, in order to obtain the needed consent from the Defendant, for the Judge to remain on the case. A Defendant is guaranteed a fair, unbiased Judge, and Article VI Section 11 is not provided in the Tennessee Constitution to further empower or protect a Judge, but is provided to protect a Defendant from judicial abuse and favoritism by a powerful Judge. Therefore, a Mistrial is requested based upon the following facts:

- 1) Judge Steve Dozier’s Oct 23rd recusal order acknowledges that Judge Dozier has “*an uncle,*” and also possibly knows “*dozens*” of Covenant Presbyterian Church (CPC) members and ex-members, which would include Covenant Member-Attorney and Fraternal Order of Police General Counsel, Worrick Robinson, who is a past financial donor and supporter of Judge Dozier’s judicial campaign, and also attended the 2-hr sentencing hearing on Sept 28th, as well as appearing at the Court’s entrance on Sept 11

when the Defendant's jury trial began. Judge Steve Dozier's long-time relationship with Worrick Robinson is reason enough for a Mistrial to be declared since the Defendant was not informed of the "*friendship-donor-conflict of interest*" and the Defendant did not grant his needed consent for Judge Steve Dozier to remain as presiding judge.

- 2) Judge Steve Dozier's uncle, Don Dozier, was a former police officer and member of CPC, and is listed as a charter member of Westminster Chapel after CPC had a congregational meeting on Oct 2, 2016, when Covenant Members voted to fire Covenant Sr. Pastor Jim Bachmann, who is now the Founding Pastor of Westminster Chapel where Don Dozier is a charter member, and hundreds of other ex-Covenant members have also joined as charter members, with the new church now occupying Julia Green Public School. Judge Dozier's recusal order states he did not know about the church membership of "*an uncle,*" and also states that the Defendant's premise toward the Court is based upon "*inaccurate information.*" However, the Defendant is now incarcerated a 6th day facing 11 months and 29 days in prison and the Defendant seizes Article VI Section 11 as a fundamental, guaranteed right directly intended as a protection for the Defendant against any prejudice, bias, or favoritism by a Judge, since Judges should "*recuse*" if there is even the appearance of prejudice to preserve the integrity of the Court. Therefore, Judge Dozier's long-time friendship with Covenant Member Worrick Robinson, or Covenant-Westminster Member Uncle Don Dozier, or "*dozens*" of current and former Covenant Members-- if made known to the Defendant-- would have never obtained the needed consent of the Defendant if he had known about such friendly, donor and blood-kin relationships prior to the Sept 11-12 jury trial, or the Sept 28th sentencing hearing which Covenant-Attorney Worrick Robinson attended.

- 3) After the Sept 28th sentencing hearing, the Defendant learned that Uncle Don Dozier had been a Covenant Member during the decade long Covenant child-molester cover-up effort, while Judge Dozier's description within the recusal order of the sentencing refers to the Defendant's "*decade long obsession*" further demonstrating Judge Dozier's bias in favor of Uncle Don Dozier, Worrick Robinson, John Bryant, and CPC, and against the Defendant, who is a child sex abuse whistleblower and now a secessionist "*hate*" group whistleblower for the protection of Julia Green Public School.
- 4) After the Sept 28th sentencing hearing, the Defendant learned that Uncle Don Dozier, did refer to Dr. Martin Luther King, Jr., with the derogatory and racist phrase of "*Martin Lucifer*," and this derogatory opinion of Dr. Martin Luther King is also shared by other "*racist-secessionist-hate*" groups monitored by the Southern Poverty Law Center in Montgomery, AL. To further demonstrate a "*Uncle Don*" bias from the Court, Judge Steve Dozier granted a prosecutor motion banning the Defendant from speaking the name of "*Bull Connor*" before the jury during the jury trial. Bull Connor is the infamous ex-Police Chief for the city of Birmingham who presided over the Birmingham Police Department that arrested Dr. Martin Luther King, and who also used water guns and German shepherds on African-American freedom protestors in the 60's, and who also presided over the Birmingham Police Department to arrest over 900 African-Americans, which included many young school children. In addition to the Covenant-Police effort to protect Mike Huckabee's co-author, John Perry, a known child-molester, the Covenant-Westminster church organizations also wish to conceal "*racist-secessionist*" affiliations with the League of the South, the Mary Noel Kershaw Foundation (husband was Jack Kershaw, a Nashville attorney for James Earl Ray, the convicted assassin of Dr. Martin

Luther King, Jr.), and the secessionist dedicated Southern National Congress, along with other alliances to other groups like the Nationalist Front, another secessionist organization. Additionally, Uncle Don Dozier, David O. Jones, and the like-minded anti-Martin Luther King Philosophy forces now occupy the Julia Green Public School property-- in Green Hills near the Harpeth Hall school, with the armed protection of security and the Nashville Police Department, and now possess the blessing and support of Gov Bill Haslam, the Tennessee General Assembly, Mayor Megan Barry, the Nashville Metro Council, the Nashville Metro School Board, DA Funk's Office, and now importantly, a Sept 28th written order by Judge Steve Dozier banning the Defendant again from the public property of Julia Green School, where Uncle Don Dozier attends Westminster Chapel as a founding charter member. Judge Dozier's recusal order asserts his court had no bias against the Defendant but a pre-trial ruling against the Defendant denying the Defendant's ability to use the name "*Bull Connor*" in front of a jury, along with the Defendant's references or attempts to fully share with the jury about the Defendant's family being banned from Julia Green school (which were stopped in court), plus the "*stay away*" order added to the final written order banning the Defendant again from the Julia Green Public School property, would all lead a reasonable person to conclude that Judge Dozier was protecting Westminster Chapel at Julia Green Public School, where his Uncle Don Dozier was a charter member, along with David O. Jones with his numerous ties to the League of the South, Mary Noel Kershaw Foundation, the Southern National Congress, and others who wish to secede from the United States of America. The probation order protects discovery of any other potential church members who also belong to SLPC identified "*racist-secessionist-hate*" groups.

- 5) Additionally, Judge Steve Dozier did not disclose that his father, Major Tom Dozier, was a police veteran with 50 years of service, or that all police chiefs were honorary pall bearers at his father's funeral.
- 6) Additionally, DA Funk's office did not provide the names of two prosecution witnesses prior to trial during the discovery process, and the PCA by-law information used by retired Federal Judge John Bryant during his surprise, unexpected testimony. The two undisclosed witnesses were officer James Smith and retired Federal Judge John Bryant. Also, the exculpatory evidence provided by the Defendant to the DA's office was ignored and the unwarranted, malicious prosecution of the Defendant continued. DA Funk's attorney against Scripps is Covenant Member James Kay and a photograph of Attorney James Kay in a confederate uniform was included in the email links of Oct 20, 2017 on the day the Defendant was jailed. Also, John Bryant testified he was a member of Woodmont Baptist Church in 2008 when Scott Troxel wrote a fake trespass letter.
- 7) Covenant Ruling Elder Scott Troxel and John Bryant provided false information to a trusting jury when they testified that Covenant Ruling Elders possessed the absolute secular authority to ban people from the Covenant Property without the needed consent of the voting members of the Covenant Presbyterian Church (of Nashville) Corporation, registered as a non-profit organization with the secular State of Tennessee. Chapter 9 of the PCA (Presbyterian Church in America) by-laws clearly regulate that the elected deacons are "*stewards*" overseeing the non-profit property belonging to the congregation and that no significant property decision-- such as banning-- secretly-- a member or public invitee can be done without the consent of the congregation (the secular property owners) and the approval of the Ruling Session. In the Defendant's case, the prosecution

relied solely on the sworn testimony of Scott Troxel and Federal Judge John Bryant and prosecutors did not present any church board minutes or congregation meeting minutes proving the banning was actually and legally authorized by the lawful secular property owners. In reality, Scott Troxel hijacked a secular non-profit property for his own personal use and Nashville Police assisted Scott Troxel in the hijacking theft, all to the great detriment of 1000+ Covenant Members and financial donors who had no idea what Scott Troxel was doing-- with their own joint property. During the Sept 11-12 jury trial of the Defendant, Scott Troxel and John Bryant deliberately provided false information to a trusting jury for the sole purpose of convicting an innocent Defendant as an on-going child-molester cover-up effort continued brazen in a criminal court, although failed and collapsing before a Nashville jury. This failure was clearly manifested when Scott Troxel was directly asked "*what are you hiding,*" and Scott Troxel told the jury he was not hiding anything, only to be pressed further under cross examination to admit that he knew about child-molester John Perry's sex-crime prior to writing the 2008 fake trespass letter.

- 8) Scott Troxel and Retired Federal Judge John Bryant were / are also under the spiritual leadership of Pastor Billy Barnes who is son-in-law of Dr. Frank Barker, a PCA founder and founding pastor of Briarwood Presbyterian Church in Birmingham, AL. Pastor Barnes and other Covenant Leaders have been provided information on the recent first-of-its-kind "*police bill*" before the AL State Legislature and the modern-day connections of the "*police bill*" sponsor, Sen Jabo --- (Waggoner?), who is the son of Bull Connor's political ally and city leader (Jabo Waggoner, Sr.?), during the historic Birmingham civil rights era of the 1960's when Dr. Martin Luther King, Jr., was jailed and wrote his famous letter from a Birmingham jail to the city's white pastors. Again, Covenant Ex-

Member and current Westminster David O. Jones was the President of the Mary Noel Keershaw foundation which was founded by Jack Kershaw, an attorney for James Earl Ray, the convicted assassin of Dr. Martin Luther King. Again, Judge Steve Dozier's uncle, Don Dozier, also belonged to Covenant and now belongs to Westminster Chapel with fellow member David O. Jones, and Uncle Don Dozier is an ex-Nashville police officer who made a derogatory reference to Dr. King as "*Martin Lucifer*," and also had a brother named Major Tom Dozier (Judge Dozier's father) who worked for the Nashville Police Dept for 50 years and worked at the Nashville Police Training Academy. Again, Uncle Don Dozier and dedicated secessionist David O. Jones, both occupy Julia Green Public School with the blessing of Mayor Megan Barry, Nashville Police, and many others cited before, but the four tax-paying members of the Defendant's family are banned from the public school property and park. Additionally, one member of the Defendant's family attended Julia Green as a child, and is now banned.

- 9) The Defendant informed Judge Steve Dozier on multiple occasions about his concerns about the indictment process which included the presiding judge, Casey Moreland, long-time friend of Covenant Member-Attorney Worrick Robinson, who is now arrested by the FBI and indicted by a Federal Grand Jury himself, but Judge Dozier saw no harm to impartial justice in the friendship-possible donor- "*conflict of interest*" and did not disclose his own relationship with Worrick Robinson, and did not choose to voluntarily recuse himself from the Defendant's case which involved Covenant Presbyterian Church, Worrick Robinson, and Jim Bachmann, who were all named in Sgt. Twana Chick's police report on July 2, 2008.

- 9) Additionally, Judge Dozier nor DA Funk's office were concerned about long-time friend of the police and grand jury foreman, Stan Fossick, possibly presiding over the original indictment, or the superseded indictment, even though Stan Fossick is a long-time family friend of the Dozier's and a political financial donor to both Judge Dozier's and DA Funk's campaigns, and has served as grand jury foreman over 40+ times per The Tennessean.
- 10) As for the probation order handed to the Defenant on Sept 28, 2017, the Defendant has done his best to comply with the unusual order which had several changes when the written order was obtained, and appears to be overly excessive and a violation of the Defendant's 1st Amendment rights since the single charge was aggravated criminal trespass, and not a charge which involved the restriction of "*free speech*." Additionally, contacting former Covenant Members and a stay away order at Julia Green Public School-- where Uncle Don Dozier is free to attend with police protection-- were added to the written order which the Defendant later obtained and included in the email sent on Oct 20, 2017, prior to the Defendant's arrest and jailing on the same day.
- 11) On Oct 20, 2017, the Defendant's family and a friend were planning to attend the MBA spaghetti supper and the Brentwood Academy football game when the Defendant returned home from walking his dogs to be arrested in his wife's apartment following Judge Cheryl Blackburn's signed order to arrest for probation violation. The Defendant was prosecuted by Special Prosecutor Ben Russ in a 7th post-trial hearing following the Defendant's secret banning from the 1st Vanderbilt Rape Trial which also involved Covenant Member Worrick Robinson. The secret banning of the Defendant during a televised, public trial was also excessive and a violation of constitutional rights since

trials are open to the public (*Judge Blackburn should recuse if she is assigned as new judge*).

- 12) The Defendant did his best to comply with Judge Dozier's probation order by doing the following: 1) Attended probation orientation and had a probation in home visit; 2) Stayed away from the physical properties of Covenant Presbyterian Church and Julia Green Public School; 3) Did not send any mass emails using the Covenant Member Directory, and does not wish to ever communicate or send emails to anyone at Covenant, or to send emails using the Covenant Directory again; 4) Did not send emails to the individual people Judge Dozier named in court which include to the best of Defendant's memory: Worrick Robinson, Jim Bachmann, Scott Troxel, John Bryant, and Greg Lurie; 5) Was making plans to meet with a counselor as ordered by the Court, but now is unable to do so because of incarceration.
- 13) Per Judge Dozier's recusal order, the Court has a copy of the Oct 20th email which includes links which will inform the Court about the child-molester cover-up to protect Mike Huckabee's co-author, John Perry, and also new information about the "*secessionist-racist-hate*" group affiliations connected to Covenant Presbyterian Church, and Westminster Chapel, which now occupies the public school property at Julia Green School with the blessing of Mayor Megan Barry, the Nashville Police Department, the Nashville School Board, the Metro Council, the Tennessee General Assembly, Gov Bill Haslam, and DA Funk's office, while the Defendant's family is banned from the public property, including a former female student of Julia Green who was also banned from seeing Mayor Barry on 2/10/17.

In conclusion, Article VI Section 11 of the Tennessee Constitution protects a Defendant from a Judge with prejudice or favoritism benefiting an opposing party. In this case involving Covenant Presbyterian Church, the Defendant was never permitted an unbiased Judge as he was brought before Worrick Robinson's long-time friends, ex-Judge Casey Moreland, and Judge Steve Dozier, and the Defendant requests for the Sept 12th verdict to be vacated, and a Mistrial Declared.

Respectfully Submitted,

Willie Austin Davis

10/25/2017

cc: S. Chandler Harris

III

Willie Austin Davis

Inmate # 540950

Case # 2017 – A – 62

Contact Info:

P..O. Box 196383

Nashville, TN 37219

AUSTIN DAVIS WAS **BANNED** FROM COMPARING THE DA'S OFFICE & POLICE TO FORMER BIRMINGHAM POLICE CHIEF BULL CONNOR. IN STARK CONTRAST, JUDGE DOZIER'S UNCLE IS **UNRESTRICTED** TO USE HIS "FREE SPEECH" TO CALL DR. MARTIN LUTHER KING: "**MARTIN LUCIFER.**"

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE
DIVISION I

2017 AUG 15 PM 2: 22

CRIMINAL COURT D. TP

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STATE OF TENNESSEE)

VS.)

WILLIE AUSTIN DAVIS)

CASE NO: 2017-A-62

Judge Steve Dozier

MOTION IN LIMINE 5

The Office of the District Attorney General, prosecuting on behalf of the State of Tennessee, respectfully requests this Court to order the defendant from referencing counsel for the State of Tennessee as anything other than "Mister," "Miss," or "General." In previous court dates on this matter, the defendant referred to counsel for the State several times as "Bull Connor"¹. The State submits such references are inappropriate, and would serve to distract the jury from its role as the trier of fact in this matter.

Donald Dozier

September 15, 2013



This was reportedly seen in Washington at the march for **Martin Lucifer**. The major news networks seem to have missed this from the anniversary parade of the Martin Luther King Jr. speech in Washington.

Respectfully submitted,

S. Chandler Harris
Tenn. Sup. Ct. Reg. #32147
Assistant District Attorney General
Washington Square, Suite 500
222 Second Avenue North
Nashville, TN 37201-1649
(615) 862-5500



General Jenny Charles

Asst DA Charles went all out using "hearsay" to demonize Austin Davis as a "creepy" stalker scaring Channel 4's Demetria Kalodimos, Mayor Megan Barry, and TN Governor Candidate Beth Harwell. She referred to his work as an "arts and craft" hobby.

¹ This was an apparent reference to 1960s-era Birmingham Police Commissioner Theophilus Eugene Connor.

JUDGE STEVE DOZIER DID NOT TELL A NASHVILLE JURY ABOUT UNCLE DON DOZIER OR "MARTIN LUCIFER."

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE

Case Number: 2017-A-62 Count # 1 Counsel for the State: C. Harris / J. Charley
 Judicial District: 20th Judicial Division: 1 Counsel for the Defendant: Willie Austin Davis
 State of Tennessee Retained Pub Def Appt Private Atty Appt
 Defendant: Willie Austin Davis Alias: _____ Date of Birth: 7-20-55 Sex: M
 Race: W SSN: _____ Driver License #: _____ Issuing State: _____
 State ID #: _____ County Offender ID # (if applicable): _____ TOMIS/TDOC #: _____
 Relationship to Victim: _____ Victim's Age: _____
 State Control #: _____ Arrest Date: 11-15-15 Indictment Filing Date: 1-30-17

JUDGMENT Original Amended Corrected

Some the parties for entry of judgment.

On the 28 day of September, 2017, the defendant:

<input type="checkbox"/> Pled Guilty <input type="checkbox"/> Dismissed/Nolle Prosequi <input type="checkbox"/> Pled Nolo Contendere <input type="checkbox"/> Pled Guilty - Certified Question Findings Incorporated by Reference Is found: <input checked="" type="checkbox"/> Guilty <input type="checkbox"/> Not Guilty <input checked="" type="checkbox"/> Jury Verdict <input type="checkbox"/> Not Guilty by Reason of Insanity <input type="checkbox"/> Bench Trial	Indictment: Class (circle one) 1 st <u>A</u> B C D E <input type="checkbox"/> Felony <input checked="" type="checkbox"/> Misdemeanor Indicted Offense Name AND TCA §: <u>Agg. Criminal Trespass</u> Amended Offense Name AND TCA §: _____ Offense Date: <u>11-15-15</u> County of Offense: <u>Davidson</u> Conviction Offense Name AND TCA §: <u>Agg. Criminal Trespass</u> Conviction: Class (circle one) 1 st <u>A</u> B C D E <input type="checkbox"/> Felony <input checked="" type="checkbox"/> Misdemeanor Is this conviction offense methamphetamine related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Sentence Imposed Date: <u>9-28-17</u>
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After considering the evidence, the entire record, and in the case of sentencing, all factors in Tennessee Code Annotated Title 40, Chapter 35, all of which are incorporated by reference herein, it is ORDERED and ADJUDGED that the conviction described above is imposed hereby and that a sentence and costs are imposed as follows:

Offender Status (Check One)	Release Eligibility (Check One)	Concurrent with:	Pretrial Jail Credit Period(s):
<input type="checkbox"/> Mitigated <input type="checkbox"/> Standard <input type="checkbox"/> Multiple <input type="checkbox"/> Persistent <input type="checkbox"/> Career	<input type="checkbox"/> Mitigated 20% <input type="checkbox"/> Mitigated 30% <input type="checkbox"/> Standard 30% <input type="checkbox"/> Multiple 35% <input type="checkbox"/> Persistence 45% <input type="checkbox"/> Career 60% <input type="checkbox"/> Agg Rob 85% <input type="checkbox"/> 40-35-501(i) 100% <input type="checkbox"/> 39-13-518 100%	<input type="checkbox"/> 1 st Degree Murder <input type="checkbox"/> Drug Free Zone <input type="checkbox"/> Gang Related <input type="checkbox"/> Repeat Violent Off	From _____ to _____ From _____ to _____ From _____ to _____ From _____ to _____

Sentenced To: TDOC County Jail Workhouse
 Sentence Length: _____ Years 11 Months 29 Days _____ Hours Life Life w/out Parole Death
 Mandatory Minimum Sentence Length: _____ 39-17-417, 39-13-513, 39-13-514, or 39-17-432 in Prohibited Zone or _____ 55-10-401 DUI 4th Offense
 or _____ 39-17-1324 Possession/Employment of Firearm or _____ 40-39-208, -211 Violation of Sex Offender Registry or _____ Meth (39-17-434, -417, -41
 Period of incarceration to be served prior to release on probation or Community Corrections: _____ Months _____ Days _____ Hours
 Minimum service prior to eligibility for work release, furlough, trusty status and rehabilitative programs: _____ % (Misdemeanor Only)
 Alternative Sentence: Sup Prob Unsup Prob Comm Corr (CHECK ONE BOX) _____ Years 11 Months 29 Days Effective: 9-28-17

WAS DRUG COURT ORDERED AS A CONDITION OF THE ALTERNATIVE SENTENCE? Yes No

Court Ordered Fees and Fines: \$ _____ Court Costs <input checked="" type="checkbox"/> Defendant <input type="checkbox"/> State \$ _____ Fine Assessed \$ _____ Traumatic Brain Injury Fund (68-55-301 et seq.) \$ _____ Drug Testing Fund (TN Drug Control Act) \$ _____ CICF \$ _____ Sex Offender Tax \$ _____ Other: _____	Restitution: Victim Name _____ Address _____ Total Amount \$ _____ Per Month \$ _____ <input type="checkbox"/> Unpaid Community Service: _____ Hours _____ Days _____ Weeks _____ Months
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The Defendant having been found guilty is rendered infamous and ordered to provide a biological specimen for the purpose of DNA analysis
 Pursuant to 39-13-521, the defendant is ordered to provide a biological specimen for the purpose of HIV testing.
 Pursuant to 39-13-524 or 39-13-518, the defendant is sentenced to community supervision for life following sentence expiration.
 Pursuant to Title 68, Chapter 11, Part 10, 71-6-117, or 71-6-119, the clerk shall forward this judgment to the Department of Health.

Special Conditions

Request 1x/m to (ap); SA Covenant Prosts, Charley; No contact via talk, text, email, blog, tweet, letter any current or former member of Covenant, SA From Julie Green Schib; attend 2x/m a licensed family counselor

Hon. Steve R. Dozier
 Judge's Name _____

 Counsel for State/Signature (optional)

Steve R. Dozier
 Judge's Signature _____

 Defendant/Defendant's Counsel/Signature (optional)

9-28-17
 Date of Entry of Judgment

_____, clerk, hereby certify that, before entry by the court, a copy of this judgment was made available to the party or parties who did not provide a signature above.
 JR-3419 (1/1/15)

2017 OCT 27 PM 3:47

In THE CRIMINAL COURT For Davidson County, Tennessee
 At NASHVILLE Assigning -
 UNKNOWN - (Judge Seth Norman)

STATE OF Tennessee

Walter Austin Davis, Defendant

III

CASE No. 2017-A-62

MOTION FOR MISTRIAL AND NEW TRIAL

Comes the incarcerated pro se Defendant, at disadvantage without access to info or better resources to write a motion, to request a mistrial based upon Article VI Section 12 of the Tennessee Constitution, which guarantees a Defendant, that no Tennessee Judge will preside over any case if there is a conflict of interest with individuals, or blood-kin, which is not disclosed to a Defendant, in order to obtain the needed consent from the Defendant, for the Judge to remain on the case. A Defendant is guaranteed a fair, unbiased Judge, and Article VI Section 12 is not provided in the Tennessee Constitution to further empower or protect a Judge, but is provided to protect a Defendant from judicial abuse and favoritism by a powerful Judge. Therefore, a Mistrial is requested based upon the following facts:

- 1) Judge Steve Dozier's Oct 23rd recusal order acknowledges that Judge Dozier has "an uncle," and also possibly knows "dozens" of Covenant Presbyterian Church (CPC) members and ex-members, which would include Covenant Member-Attorney and Fraternal Order of Police General Counsel, Worrick Robinson, who is a past financial donor and supporter of Judge Dozier's judicial campaign, and also attended the 2-hr sentencing hearing on Sept 28th, as well as appearing at the Court's entrance door on Sept 11 when the Defendant's jury trial began. Judge Steve Dozier's long-time relationship with Worrick Robinson is reason enough for a Mistrial to be declared since the Defendant was not informed of the ^{donor-}friendship conflict of interest and the Defendant did not grant his ^{needed} consent for Judge Steve Dozier to remain as the presiding Judge.
- 2) Judge Steve Dozier's uncle, Don Dozier, was a former police officer and member of CPC, and is listed as a charter member of Westminster Chapel after CPC had a congregational meeting on Oct 2, 2016, when Covenant Members voted to give Pastor Jim Bachmann, who is now the Founding Pastor of Westminster Chapel where Don Dozier is a charter member, and hundreds of other ex-Covenant members have also joined as charter members, with the new church now occupying Julia Green Public School. Judge Dozier's recusal order states he did not know about the church membership of "an uncle," and also states that the Defendant's premise for the Court is based upon "inaccurate information." However, the Defendant is now incarcerated a 6th day facing 11 months or 29 days in prison and the Defendant seizes Article VI Section 12 as a fundamental, guaranteed right directly intended as a protection for the Defendant against any prejudice, bias, or favoritism by a Judge, since Judges should recuse if there is ^{even the} appearance of prejudice to preserve the integrity of the Court. Therefore, Judge Dozier's long-time friendship with Covenant Member Worrick Robinson, or Covenant Westminster Member ^{Uncle} Don Dozier, or "dozens" of current and former Covenant Members -- if made known to the Defendant -- would have never obtained the ^{needed} consent of the Defendant if he had known about such ^{donor and blood-kin} friendly relationships prior to the Sept 11-12 jury trial, or the Sept 28th sentencing hearing which Covenant-Attorney Worrick Robinson attended.

DA Funk's office did not provide the names of two prosecution witnesses prior to trial during the discovery process, ^{by} out-law information used by retired Federal Judge John Bryant during his surprise, unexpected testimony. The two undisclosed witnesses were Officer James Smith and retired Federal Judge John Bryant. Also, the exculpatory evidence provided by the Defendant to the DA's office was ignored and the unwarranted, malicious prosecution of the Defendant continued. DA Funk's attorney's Covenant Member James Key and a photograph of James Key in a Confederate uniform was included in the email links of Oct 20, 2017 on the day the Defendant was jailed. Also, John Bryant testified he was a member of Woodmont Baptist Church in 2008 when Scott Troxel with false trespass letters

1) Covenant Ruling Elder Scott Troxel and John Bryant provided false information to a trusting jury when they testified that Covenant Ruling Elders possessed the ^{absolute} secular authority to ban people from the Covenant Property without the needed consent of the voting members of the Covenant Presbyterian Church (Nashville) Corporation, registered as a non-profit organization with the secular state of Tennessee. Chapter 9 of the PCA (Presbyterian Church in America) bylaws clearly regulate that the elected deacons are "stewards" overseeing the non-profit property ^{belonging to the congregation} and that no significant property decision -- such as banning -- secretly -- a member or public invitee can be done without the consent of the congregation (the secular property owners) and the approval of the Ruling Session. In the Defendant's case, the prosecution relied solely on the sworn testimony of Scott Troxel and Federal Judge John Bryant and did not present any church board minutes or congregation meeting minutes proving the banning was actually and legally authorized by the lawful ^{secular} property owners. In reality, Scott Troxel hijacked a non-profit property for his own personal use and Nashville Police assisted Scott Troxel in the hijacking theft, all to the great detriment of 1000+ Covenant members and financial donors who have no idea what Scott Troxel was doing -- with their own joint property. During the Sept 11-12 jury trial of the Defendant, Scott Troxel and John Bryant deliberately provided false information to a trusting jury for the sole purpose of convicting an innocent Defendant as an on-going child-molester cover-up effort continued in a criminal court, although failed and collapsing before a Nashville jury. This failure was clearly manifested when Scott Troxel was directly asked "what are you hiding," and Scott Troxel told the jury he was not hiding anything, only to be pressed further under cross examination to admit that he knew about child-molester John Perry's sex crime prior to writing the 2008 fake trespass letter.

8) Scott Troxel and Retired Federal Judge John Bryant are also under the spiritual leadership of Pastor Billy Barnes who is son-in-law of Dr. Frank Barker, a PCA founder and founding pastor of Briarwood Presbyterian Church in Birmingham, AL. Pastor Barnes and other Covenant Leaders have been provided information on the recent first-of-its-kind "police bill" before the AL State Legislature and the modern-day connections of the "police-bill" sponsor, Sen. Jabo ^(Wassner), who is the son of Bill Connor's political ally and city leader during the historic Birmingham civil rights era of the 1960's when Dr. Martin Luther King, Jr. was jailed and wrote his famous letter from a Birmingham jail to the city's white pastors. Again, Covenant Member ^{and} current Westminster David O. Jones was the President of the Mary McEl Kershaw foundation which was founded by Jack Kershaw, ^{an} attorney for James Earl Ray, the convicted assassin of Dr. Martin Luther King. Again, Judge Steve Dozier's uncle, Don Dozier, also belonged to Covenant and now belongs to Westminster Chapel with ^{settled member} David O. Jones, and Uncle Don Dozier is an ex-Nashville police officer who made derogatory reference to Dr. King as "Martin Lucifer," and also had a brother named Major Tom Dozier (Judge Dozier's father) who worked for the Nashville Police Dept for 50 years and worked at the Nashville Police Training Academy. Again, Uncle Don Dozier and ^{Dedicated} Secessionist David O. Jones, both occupy Julia Green Public School with the blessing of Mayor Megan Barry, Nashville Police, and many others cited before, but the four ^{of the} members of the Defendant's family are banned from the public school property and park. ^{Additionally, one member of the Defendant's family attended Julia Green as a child, and is now banned.}

9) The Defendant informed Judge Steve Dozier on multiple occasions about his concerns about the indictment process which included the presiding judge, Casey Moreland, long-time friend of Covenant Member-Attorney Warwick Robinson, who is now arrested by the FBI and indicted by a Federal Grand Jury himself, but Judge

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... saw no harm to impartial justice in the ^{friendship} ~~conflict of interest~~ ^{possible donor} and did not disclose his own relationship with Warwick Robinson, and did not choose to voluntarily recuse himself from the Defendant's case which involved Covenant Presbyterian Church, Warwick Robinson, and Jim Bachmann, who were all named in Sgt. Twain Clark's police report of July 2, 2008.

9) Additionally, Judge Dozier nor DA Funk's office were concerned about long-time friend of the police and grand jury foreman, Stan Fossick, possibly presiding over the original indictment, or the superseded indictment, even though Stan Fossick is a long-time family friend of the Doziers and a political financial donor to both Judge Dozier's and DA Funk's campaigns, and has served as grand jury foreman over 40+ times per The Tennessean.

10) As for the probation order handed to the Defendant on Sept 28, 2017, the Defendant has done his best to comply with the ^{several} ~~order~~ ^{unusual} which had changes when the written order was obtained, and appears to be ^{very} excessive and a violation of the Defendant's 1st Amendment rights since the single charge was aggravated criminal trespass, ~~and not a charge which involved the restriction of "free speech."~~ Additionally, contacting former Covenant Members and a stay away order at Julia Green Public School -- where under Don Dozier is free to attend with police protection -- were added to the written order ^{which} the Defendant later obtained and included in the email sent on Oct 20, 2017, prior to the Defendant's arrest and jailing on the same day.

11) On Oct 20, 2017, the Defendant's family and a friend were planning to attend the MBA spheriti supper and the Brentwood Academy football game when the Defendant returned home from walking his dogs to be arrested in his wife's apartment following Judge Cheryl Blackburn's signed order to arrest for probation violation. The Defendant was prosecuted by Special Prosecutor Ben Russ in a 7th post-trial hearing following the Defendant's secret banning from the ~~trial~~ 1st Vanderbilt Rape Trial which also involved Covenant Member Warwick Robinson. The secret banning of the Defendant during a televised, public trial was also excessive and a violation of constitutional rights since trials are open to the public. ^(Judge Blackburn should recuse if she is assigned as new judge.)

12) The Defendant did his best to comply with Judge Dozier's probation order by doing the following:
1) Attended probation orientation and had a probation in home visit; 2) Stayed away from the physical properties of Covenant Presbyterian Church and Julia Green Public School; 3) Did not send any mass emails using the Covenant Member Directory, ^{does not wish to ever communicate or send emails to anyone at Covenant,} and ~~send~~ ^{send} emails ~~using~~ ^{using} the Covenant Directory again; 4) Did not send emails to the individual people Judge Dozier named in court, which include to the best of Defendant's memory; Warwick Robinson, Jim Bachmann, Scott Travel, John Bryant and Greg Luvie; 5) Was making plans to meet with a counselor as ordered by the Court, ^{but now is unable to do so because of} ^{in incarceration.}

13) Per Judge Dozier's recusal order, the Court has a copy of the Oct 20th email which includes links which will inform the Court about the child-molester cover-up to protect Mike Huckabee's co-author, John Perry, and also new information about the "secessionist-racist-hate" group affiliations connected to Covenant Presbyterian Church, ^{Westminster Chapel,} and ^{which now occupies the public school property at} Julia Green School with the blessing and protection of Mayor Megan Barry, the Nashville Police Department, the Nashville School Board, the Metro Council, ^{God Bill Haslam,} the Tennessee General Assembly, ^{and} DA Funk's office, while the Defendant's family is banned from the public property, including a former ^{former} ^{student of Julia Green who was also} ^{banned from seeing Mayor Barry on} 2/10/17.

In conclusion, Article VI Section 11 of the Tennessee Constitution protects a Defendant from ~~judicial~~ Judge with prejudice or favoritism benefiting an opposing party. In this case involving Covenant Presbyterian Church, the Defendant was never permitted an unbiased Judge as he was brought before Warwick Robinson's longtime friends, ex-Judge Cary Moreland, and Judge Steve Dozier, and the Defendant requests for the Sept 12th verdict to be ^{respectfully} ^{submitted,} ^{and a} ^{Mistrial} ^{Declared.}

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cc: S. Chandler Harris Willie Austin Davis 10/25/2017

III.

Willie Austin Davis

inmate # 540950

CASE # 2017-A-62

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